

**REPORT FOR: OVERVIEW AND  
SCRUTINY COMMITTEE**

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| <b>Date of Meeting:</b>               | 12 <sup>th</sup> June 2012  |
| <b>Subject:</b>                       | Pre-Submission Site Allocations DPD   |
| <b>Responsible Officer:</b>           | Andrew Trehern – Corporate Director<br>of Place Shaping   |
| <b>Scrutiny Lead<br/>Member area:</b> | Environment and Enterprise  |
| <b>Exempt:</b>                        | No  |
| <b>Enclosures:</b>                    | Schedule and Site Allocations DPD -<br>(Due to the size of this document it<br>has been circulated to Members of the<br>Committee only and can be viewed on<br>the Council's website) |

## **Section 1 – Summary and Recommendations**

This report summarises the changes that have been made to the Site Allocations DPD to prepare it for pre-submission consultation and submission to the Planning Inspectorate for Examination in Public.

**Recommendations:**

The Committee is requested to consider and comment on the pre-submission version of the Site Allocations DPD which is to be reported to Cabinet at its meeting of 20<sup>th</sup> June 2012.

## **Section 2 – Report**

### **A. Introduction**

1. Harrow's Core Strategy was adopted on 16<sup>th</sup> February 2012 and comprises a spatial strategy for growth for the Borough as a whole to provide a minimum of 6,050 new homes<sup>1</sup> and 4,000 jobs over the plan period 2009 to 2026. A major component of the strategy for the delivery of growth is the designation of the Harrow & Wealdstone Intensification Area, to accommodate at least 2,800 new homes and 3,000 jobs. This leaves a requirement to find land for the balance of (at least) 3,250 homes and 1,000 jobs throughout the rest of the Borough.

2. The Core Strategy gives a clear commitment to the protection of all of the Borough's open space and gardens. It therefore sets out to meet development needs on previously-developed land within town centres and in other locations with good public transport accessibility.

3. It is a corporate priority to prepare a Site Allocations development plan document (DPD), alongside other DPDs, to give effect to and support the Core Strategy. A draft compendium of 'preferred option' site allocations was published for consultation during May and June last year, and the outcome of this consultation was reported to the LDF Panel on 19<sup>th</sup> July 2011. The focus of the LDF team during the second half of the year was the Core Strategy Examination in Public.

4. The recently published National Planning Policy Framework (NPPF) reaffirms the Government's commitment to a plan-led system, but places a clear expectation on local planning authorities to plan positively for objectively assessed growth and development needs. To underline, in particular, the importance that the Government attaches to housing delivery, the NPPF requires local authorities to maintain an annual, rolling five-year supply of deliverable housing sites with an additional 5 per cent (i.e. one year's supply) buffer, and penalises authorities who have historically underperformed against housing targets by increasing the buffer to 20 per cent. In view of the Government's commitment to growth and housing, and the lack of sufficient up-to-date allocated sites on the Harrow proposals map, there is now a pressing need to progress the Site Allocations DPD through the development plan process to adoption next year.

5. It should be noted that the recently published Town and Country Planning (Local Planning) (England) Regulations (2012) applies new terminology to what has traditionally be known as the proposals map. The 'adopted policies map' will replace the Harrow proposals map and will identify the development sites identified in the Site Allocations DPD as well as illustrating geographically the application of policies.

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<sup>1</sup> This incorporates the London Plan (2011) annualised target of 350 homes per annum rolled forward to 2026.

6. This report introduces the 'pre-submission' Site Allocations DPD and explains how its preparation has responded to last year's consultation and the adoption of Harrow's Core Strategy (February 2012).

## **B. Options Considered**

7. In view of the Council's commitment, set out in Harrow's Local Development Scheme (LDS) and corporate priorities, to prepare a Site Allocations DPD, and the implications in terms of national planning policy and Core Strategy commitments of not identifying sites to meet the Borough's development needs, the option not to progress with the preparation of the DPD can be discounted.

8. Broad, strategic options for accommodating growth within the Borough were presented and consulted-upon through the preparation of the Core Strategy. The adopted Core Strategy gives a clear undertaking to meet all of the Borough's development needs on previously developed land. Therefore, in terms of sites proposed to be allocated for development, the 2011 consultation draft Site Allocations DPD represented the Council's 'preferred option' by identifying only previously-developed sites which, in the opinion of officers, are deliverable over the plan period and consistent with the objectives of the Core Strategy. The 2011 draft also illustrated proposed changes to retail, employment and open space designations that will require formal amendment to the adopted policies map. The 'pre-submission' Site Allocations DPD has been prepared taking account of responses to the 2011 'preferred option' consultation document.

## **C. Pre-Submission Site Allocations DPD**

9. The pre-submission Site Allocations DPD will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously 'Regulation 27'). This represents the final stage of consultation, being the version of the DPD that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is 'sound'. The tests of soundness are explained later in this report (see 'Next steps'). It should be noted that site allocations within the Harrow & Wealdstone Intensification Area will be set out in the Area Action Plan and are therefore not included in the Site Allocations DPD.

10. The schedule attached to this report sets out in detail how the pre-submission Site Allocations DPD addresses the responses received during the preferred option consultation. The preparation of the pre-submission document has also been informed by strategic policy documents that have been adopted in the period since the 2011 consultation; namely:

- the National Planning Policy Framework (NPPF);
- the London Plan; and
- the Harrow Core Strategy.

11. The following paragraphs summarise and explain the main changes to the site allocations DPD by chapter:

## Retail

12. The retail chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modifications to shopping frontages within South Harrow, North Harrow, Pinner and Stanmore district centres, in response to recommendations contained within the Harrow Retail Study (2009) and to correct existing omissions on the proposal map; and
- geographic representation of the neighbourhood parades identified in the (then emerging) Core Strategy; and
- identification of primary shopping areas within South Harrow, Rayners Lane, Pinner and Stanmore district centres, to comply with national policy in (then extant) PPS 4.

13. Few representations were received during the preferred option consultation to the retail chapter. The pre-submission DPD continues to propose the recommended changes to shopping frontages and the identification of the (now adopted) Core Strategy neighbourhood parades. The NPPF continues to require local planning authorities to define the extent of town centres and primary shopping areas. No justification for amending the boundary of any town centre (outside of the AAP area) has emerged, but the pre-submission DPD continues to propose primary shopping areas in the centres identified<sup>2</sup>.

14. The NPPF advises local planning authorities to ensure that retail and other town centre development needs are not compromised by limited site availability, and therefore requires a suitable range of in centre and (where appropriate) edge of centre sites to be allocated. The focus for substantial new retail and leisure development will continue to be Harrow town centre, consistent with the Core Strategy and the London Plan town centre hierarchy. However, the pre-submission Site Allocations DPD now includes sites suitable for retail development within other town centres, based upon the recommendations<sup>3</sup> of the Harrow Retail Study (2009), to ensure a suitable choice of sequentially preferable retail development sites. They are:

- Land between High Street and Love Lane, **within** Pinner district centre (0.31 ha);
- Single storey units south of Rayners Lane station, Alexandra Avenue, **within** Rayners lane district centre (0.11 ha);
- VB & Sons, Kenton Road/Honeypot Lane, **edge** of Kingsbury district centre (0.18 ha);
- Harrow West Conservative Association and Hallmark Cars, Village Way, **edge** of Rayners Lane district centre (0.19 ha);
- Roxeth Library and clinic, Northolt Road, **edge** of centre South Harrow district centre (0.165 ha); and

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<sup>2</sup> Other town centres are not considered to have significant multiple retail and other roles, and therefore it is not necessary to identify a primary shopping area within them.

<sup>3</sup> Only those sites rated in the Study as having a reasonable or good prospect of development within the plan period. Those rated reasonable/poor and poor have been excluded.

- North Harrow Methodist Church, Pinner Road, **edge** of North Harrow district centre (0.34 ha).

15. In the case of the High Street/Love Lane and Alexandra Avenue sites, both are located within the proposed primary shopping areas of the relevant centres. In the cases of the sites at Village Way, Northolt Road and Kenton Road/Honeypot Lane, these are classed as edge of centre being within 300 metres of a proposed primary shopping area (in the case of Rayners Lane and South Harrow centres) or of a designated primary shopping frontage (in the case of Kingsbury centre, within the London Borough of Brent). The Site Allocations DPD proposes to downgrade all frontages within North Harrow district centre to secondary frontage status; the site at Pinner Road would be within 300m of the nearest adjacent secondary frontage.

16. All of the above sites, although allocated principally for retail development, will be suitable for a mix of uses which includes residential. Therefore each site has been allocated a potential housing capacity figure based upon the London Plan sustainable residential quality density matrix. For consistency with this approach the Anmer Lodge and Stanmore car park site, which had been included in the housing chapter of the preferred option document, has been moved into this chapter of the Site Allocations DPD. However the size/circumstances<sup>4</sup> of the Anmer Lodge/Stanmore car park site are such that it will contain a substantial element of housing in addition to the retail/town centre uses proposed.

## **Employment**

17. The employment chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modification of the Honeypot Lane industrial and business use area designation to exclude the extent of the Stanmore Place residential development;
- modification of the Brember Road industrial and business use area designation to exclude the extent of The Arc residential development and to correct the boundary in relation to the South Harrow retail park (Waitrose etc); and
- modification of the Northolt Road business use area to exclude 201-209 Northolt Road, which is located on the residential side of Northolt Road between Brooke Avenue and South Hill Avenue.

18. The north section of the Northolt Road business use area (between Waitrose retail park access and Shaftesbury Avenue) has been the subject of residential conversion/redevelopment schemes in recent years. The pre-submission Site Allocations DPD therefore also proposes to amend the extent of this section of the area to exclude Raebarn House, Templar House and Osbury Court.

19. The potential of office redevelopment to contribute to the provision of new office space and economic diversification through enabling residential use was explored at the Core Strategy's Examination in Public. In response to

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<sup>4</sup> Only the car park is within Stanmore district centre. The total site area is 0.67 hectares.

this (and associated modifications to the Core Strategy) officers propose the following allocations for employment-led mixed use redevelopment:

- Northolt Road business use area north<sup>5</sup>;
- Northolt Road business use area south;
- 415 Burnt Oak Broadway;
- 47-49 Burnt Oak Broadway; and
- 57-59 High Street, Edgware.

20. One consultee has proposed a specific revision to the Northolt Road business use area to exclude from the designation No. 142 Northolt Road (Bovis Lend Lease) on the grounds that the existing building is of poor quality and not attractive to the market, and that de-designation would be the best means of securing successful redevelopment. However, officers consider that Core Strategy objectives for the area would be more effectively met by retaining the site within the designation to allow for a mixed use development to contribute to economic as well as residential uses.

## Housing

21. The housing chapter sets out those sites allocated solely or primarily for housing development. It should be noted that sites allocated in other chapters, particularly those relating to retail and employment development, include a housing capacity where the site is expressly identified as being suitable for a mix of uses which includes residential. Strategic previously-developed sites within the Green Belt, identified in a new chapter in the pre-submission DPD, also have housing capacity. These sites will therefore also contribute to housing supply but are not included in the housing chapter.

22. The 2011 'preferred option' DPD proposed to allocate 29 sites for housing development with a projected<sup>6</sup> capacity to provide 1,369 homes.

23. The following additional sites were put forward by consultees for inclusion as housing sites in the pre-submission Site Allocations DPD:

- Lyon House/Equitable House, Lyon Road;
- Old Lyonians sports ground, Pinner View;
- 37-41 Palmerston Road, Wealdstone;
- Wickes House, Station Road; and
- Kenton Lane Farm, Belmont.

24. Of these sites, those at Lyon Road, Palmerston Road and Station Road fall within the Harrow & Wealdstone Intensification Area boundary and are therefore within the jurisdiction of the AAP rather than the Site Allocations DPD. The Old Lyonian's sports ground is designated open space and so its allocation for development would be at odds with the Core Strategy.

25. Kenton Lane Farm contains an area of designated open space and parts of the farm complex are listed. However, the open space is not currently

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<sup>5</sup> This replaces an allocation specific to Harrow Police Station that had been included in the preferred option document.

<sup>6</sup> Calculated using the London Plan sustainable residential quality density matrix.

publicly accessible and a suitable scheme which both secures the future of the historic farm buildings and achieves public access to the open space (subject to no net loss of open space) would make a positive contribution to the delivery of Core Strategy objectives. Recognising the site constraints and the key objective for the site's development - to deliver additional public open space in this area - it is proposed allocate the site in the 'other' rather than the housing chapter of the Site Allocations DPD.

26. Many detailed representations were received in respect of the proposed housing sites in the preferred option document and these are individually dealt with in the schedule attached to this report. The following bullets highlight the main changes to the housing chapter arising from consultee comments:

- Rayners Lane Public House: the potential capacity of the site has been increased to 31 units (up from 20) to reflect recent planning decisions relating to the site, and the text amended to highlight the significance of the listed building.
- Harrow Arts Centre car park: this site has been removed from the housing chapter and is now allocated for arts and leisure uses to compliment the existing Arts Centre.
- Jubilee House: the site boundary has been extended to include two pairs of semi-detached dwellings to the south (in Merrion Avenue) which the consultee has advised are within the same ownership, enabling a more comprehensive redevelopment scheme to come forward. The site boundary has also been extended to the north to incorporate land within the ownership of another consultee.
- Canons Park Station car park: this is a new site promoted by a consultee for residential development.

27. The 'preferred option' DPD included 96 Greenford Road as a housing development site, and this has been carried forward into the pre-submission document but the site area has been increased to cover the full extent of the existing timber yard site and to give the correct address as 92-94 Greenford Road. Officers have also included the timber yard at 78-89 Greenford Road as a housing development site.

### **Strategic Previously-Developed Sites in the Green Belt and Metropolitan Open Land**

28. This is a new chapter which did not appear in the preferred option document, and responds to the adopted Core Strategy, the NPPF and engagement between officers and Harrow School.

29. The Core Strategy identifies four, strategic previously developed sites within the Green Belt. They are:

- Bentley Priory;
- Royal National Orthopaedic Hospital;
- Wood Farm; and
- Harrow College (Harrow Weald).

30. All four sites are of strategic importance because their redevelopment will deliver public benefits. The allocation of these sites therefore gives effect to the Core Strategy and, together with Green Belt policy in the pre-submission Development Management Policies DPD, will ensure that their redevelopment delivers strategic benefits and enhancement of the Green Belt.

31. Following meetings with officers, the Harrow School burser has requested that part of the school estate within Metropolitan Open Land (MOL) at Harrow on the Hill be considered for inclusion as a strategic, previously-developed site within MOL. In view of changes to the NPPF and the London Plan position that the same level of protection should be given to MoL as to Green Belt, it is the opinion of officers that there is no policy obstacle to the designation of strategic previously developed sites in MOL. In the case of Harrow School, the sites identified are of strategic importance because their redevelopment will provide the opportunity to deliver public benefit in the form of community access to sport and open space facilities. This approach is consistent with the Core Strategy which gives commitments to support the continued operation of Harrow School and to work with landowners in the Harrow on the Hill sub area to support public access to sport and recreation facilities. At this stage there is no specific proposal for alterations to the school campus but, over the life of the plan, it is considered that there may be a case for managed change linked to a site specific planning brief/SPD. As with the Green Belt, policies will require redevelopment of strategic sites in MOL to maintain and enhance openness and visual amenity.

## **Open Spaces**

32. The open spaces chapter includes details of open space not currently protected which it is proposed to designate, and a number of boundary amendments to existing open spaces, following the completion of Harrow's PPG 17 Study in 2010. The preferred option document also included the following major open space allocations:

- St. George's Playing Field, Pinner View (open space);
- Land rear of 121-255 Pinner Road (local nature reserve);
- Harrow Weald Park, Brookshill (open space);
- Glenthorne, Common Road (extension to Bentley Priory open space);
- and
- Prince Edward Playing Fields, Whitchurch Lane/Camrose Avenue (outdoor sports use).

33. In view of recent planning decisions affecting St. George's Playing Field this site has now been relocated to the 'other' chapter and allocated for public open space and enabling housing development. It should be noted however that this chapter also seeks to correct the boundary of the open space designation to take account of the approved development and the extent open space to the north of the site.

34. Consultee comments were largely supportive of the proposed open space allocations, with some amendments to the individual site commentaries suggested. In response to consultee comments it is proposed to designate an additional area of open space at the junction of The Grove and Rayners Lane, Pinner.



## **Biodiversity**

35. The biodiversity chapter of the 2011 'preferred option' DPD contained a number of changes to sites designated for their biodiversity value in response to Harrow's Biodiversity Action Plan (2008) and upon the advice of Greenspace Information for Greater London (GIGL). Again, consultee comments were generally supportive and the following changes have been made to the pre-submission Site Allocations DPD:

- revisions to the boundary of the proposed new site of nature conservation importance at Hatch End Arts Centre, to encompass the route of the recently deculverted section of the River Pinn; and
- transfer the relevant parts of the Headstone Manor site of nature conservation importance to the AAP for designation in that DPD.

## **Other**

36. The final chapter of the 2011 'preferred option' consultation document contained the following miscellaneous allocations:

- Whitchurch Playing Fields – for outdoor sports use and flood storage; and
- Belmont Clinic – for medical and community use.

37. Consultee comments supported the proposed allocation of Whitchurch Playing Fields, subject to flooding considerations. Following consultation in relation to the housing chapter, this chapter of the pre-submission Site Allocations DPD now also includes the Harrow Arts Centre site for arts and leisure uses.

38. Officers have amended the pre-submission DPD allocation in respect of St. George's Playing Field to reflect recent planning decisions and ensure that the approved public open space is delivered in the event of any future revised scheme. In response to the sites put forward by consultees (see commentary on the housing chapter above), the Kenton Lane Farm site is also now allocated in this chapter for enabling development to support the delivery of new public open space in the area, and to secure the future of heritage assets on the site.

39. Harrow's Core Strategy includes a commitment to provide 3 pitches for Gypsies and Travellers within the Borough and includes policy criteria for the consideration of new sites. No new sites have emerged or been proposed through the preferred option consultation. Therefore, to reflect the importance of the existing site in meeting the Borough's needs it is proposed to safeguard this as a Gypsy and Traveller site in the pre-submission Site Allocations DPD.

## **D. Compliance with tests for 'Soundness'**

40. The pre-submission consultation and Examination in Public will focus on the tests of soundness set out in the NPPF. To be a sound plan, the DPD must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

41. In relation to each of these tests:

### **Positively Prepared**

42. The NPPF states that plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

43. The Site Allocations DPD gives effect to the Core Strategy by allocating sufficient land to meet identified development needs over the plan period on previously developed land.

### **Justified**

44. The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives.

45. The evidence base underpinning the Core Strategy also justifies the allocations set out in the Site Allocations DPD. The allocations represent the most appropriate local response to the London Plan and the Core Strategy policies.

### **Effective**

46. The NPPF states that the plan should be deliverable over its plan period and based on effective joint working on cross boundary matters.

47. The allocations have been drafted to ensure that there are deliverable sites which meet London Plan and Core Strategy objectives.

### **Consistent with national policy**

48. The revised Site Allocations DPD takes into account the recently published NPPF, as well as responding to consultee comments wherever possible.

## **E. Next Steps**

49. Subject to Cabinet and Full Council approval, the Site Allocations DPD will be published for pre-submission public consultation in accordance with Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement), for a six week period. The pre-submission consultation is scheduled to take place during July and August. Following the consultation, the LDF team will consider all representations received and if necessary produce and consult upon any minor modifications arising from that consultation. It is anticipated that the DPD will be submitted to the Planning Inspectorate in September and that Examination in Public will take place

during December. This programme should enable adoption of the DPD to take place by April 2013.

## **F. Further Editorial Requirements for the Pre-submission Publication of the Site Allocations DPD**

68. Members should note that due to the timeframes involved in the Council reporting procedures that the submission version of the Site Allocations DPD is still very much a work in progress and is subject to further editing.

## **G. Legal Comments**

69. The legal requirements for the preparation of and consultation on Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the DPD being found 'unsound' at the examination in public.

## **H. Environmental Screening**

70. It is a statutory requirement that DPDs are subjected to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal has been undertaken and will be published for public consultation and comment alongside the DPD.

## **I. Financial Implications**

71. The cost of preparing, publishing and consulting upon the Site Allocations DPD, Development Management Policies DPD and Harrow & Wealdstone Area Action Plan, are provided-for by LDF budget together with a dedicated allocation from Planning Delivery Grant (PDG) funds as set out in the Council's Medium Term Financial Strategy. The time table for progression of the three documents has been deliberately co-ordinated to maximise savings associated with simultaneous consultation, submission and Examination in Public.

## **J. 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 | Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for |

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|                                      | on DPDs under the Planning and Compulsory Purchase Act.  | 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 now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.   | The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.   |
| 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 DPD is 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 DPD is being prepared and published in tandem. There is a risk that at 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. | 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. 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. |

## K. Equalities implications

Was an Equality Impact Assessment carried out?

72. 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.

## L. Corporate Priorities

73. The DPD will help to deliver the following 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 Site Allocations DPD responds to the comments received during the 2011 'preferred option' consultation and, by giving effect to the Core Strategy, reflects the many formal and informal stages of consultation undertaken during the preparation of that document.
- **Supporting our Town centre, and local shopping centres and businesses:** The DPD will provide a positive and clear policy framework to guide the future development and growth within town centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvement.

### Section 3 - Statutory Officer Clearance

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|------------------------|-------------------------------------|--|
| Name: Kanta Hirani     | <input checked="" type="checkbox"/> | on behalf of the*<br>Chief Financial Officer |
| Date: 28 May 2012      |                                     |  |
| Name: Abiodun Kolawole | <input checked="" type="checkbox"/> | on behalf of the*<br>Monitoring Officer      |
| Date: 24 May 2012      |                                     |  |

### Section 4 - Contact Details and Background Papers

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