

Statement of Core Strategy Conformity with the National Planning Policy Framework (NPPF)

The NPPF was published in March 2012, one month after the adoption of Harrow's Core Strategy. The Government has recommended that local authorities review existing Local Plan documents to ensure they are consistent with the NPPF. This statement sets out how Harrow's Core Strategy is in conformity with NPPF provisions.

During the Examination into Harrow's Core Strategy, a consultation was held in late 2011 which sought views on the implications for the Core Strategy of the draft NPPF. Paragraph 7 of the Inspector's Report confirms that he took into account the representations received in respect of these matters. The Inspector's Report did not identify any conflict between Harrow's Core Strategy and the Government's position with regard to the planning system and national planning policy.

The NPPF was subsequently published a month after the adoption of Harrow's Core Strategy. The provisions contained within the NPPF have remained very similar to those in the draft, and indeed in some areas such as the protection of open space and garden land the provisions have been strengthened which is in line with Harrow's policy approach, and so as set out in the Planning Inspector's report, the Council considers that the Core Strategy is fully consistent with the NPPF.

The review of Harrow's Core Strategy has been undertaken at a high level, to ensure it conforms with the approach set out in the NPPF to preparing Local Plans, and at a more detailed level to ensure that the policies in the Core Strategy conform with the relevant provisions in the NPPF.

With regards to the Core Strategy's preparation, all the policies within it have been developed to manage growth pro actively, and are considered to be consistent with the Government's requirement for a 'presumption in favour of sustainable development'. The document supports the economic regeneration of the Intensification Area, and provides for a managed approach to development across the rest of the Borough to fully meet Harrow's housing needs, as well as retail and employment land requirements, whilst protecting open space and other essential infrastructure. The Core Strategy has also been prepared using an up to date, proportionate evidence base, which was submitted and examined as part of the EIP of the Core Strategy.

The following table sets out how the Core Strategy conforms with the relevant provisions of the NPPF. No instances of non-conformity/conflict have been found.

1A: A checklist covering the key elements of the NPPF

Achieving Sustainable Development

The presumption in favour of sustainable development and Core Planning principles (paras 6-17)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</p>	<p>The Core Strategy (2012) sets out a proactive strategy to promote sustainable development in the Borough over a 17 year plan period (2009-2026). It responds positively to the strategic opportunity associated with the designation of the Harrow & Wealdstone Intensification Area by promoting housing and employment growth targets which exceed the London Plan benchmarks for the Area. It also provides for sustainable growth in town centres and on other, accessible previously developed sites throughout the rest of the Borough to meet objectively assessed needs, and allows windfall development on previously developed land to continue to come forward over the plan period both as a contingency but also to enable minimum growth targets to be exceeded. Critical Core Strategy policy provisions (e.g. affordable housing and sustainability requirements) build-in recognition of feasibility/ viability issues to ensure that development is enabled in a range of economic conditions that might be anticipated over the plan period. The Core Strategy includes details of monitoring against key objectives and trajectories, as well as triggers and contingencies and actions. Consideration of the (then) emerging NPPF formed a part of the Core Strategy EiP process, and the Planning Inspector for the Core Strategy had consideration to the Plan's compliance with the (then) draft NPPF when he prepared his final report.</p> <p>The AAP, Site Allocations and Development Management Policies local plans give effect to the Core Strategy by allocating sites that accord with the spatial strategy for development to meet and exceed - in addition to completions that have already taken place during the plan period and consented schemes – Core Strategy targets. The capacities of allocated</p>	<p>N/A</p>

	<p>sites are all expressed as minima. The AAP contains policies specific to the Intensification Area to help realise sustainable growth in the Area. The policies of the Development Management Policies Local Plan support sustainable growth beyond the Intensification Area and are positively worded to lend support to proposals which meet relevant criteria. The Development Management Policies Local Plan also includes the PINs model policy on the presumption in favour of sustainable development.</p> <p>Taken as a whole, the Local Plan provides a clear and positive strategy for sustainable development in Harrow, and contains site allocations and policies which allow proposals that accord with the plan to be approved without delay. It therefore provides a plan-led presumption in favour of sustainable development, consistent with the NPPF.</p>	
<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>	<p>As noted above, the AAP, Site Allocations and Development Management Policies local plans give effect to the Core Strategy (spatial strategy and policies). In doing so, they contribute to the NPPF core planning principles as follows:</p> <ul style="list-style-type: none"> • they provide a plan-led basis for the delivery of sustainable growth in Harrow and a clear basis for decision making • allocated sites make provision for a mix of uses and infrastructure delivery; creative policies (e.g. on public realm, the setting of Harrow Hill, lifetime neighbourhoods and beneficial use of the Green Belt) are also included in the documents • together with completions and pipeline supply, the documents allocate sufficient deliverable land to meet and exceed the Core Strategy housing target for the plan period; the AAP makes provision to meet and exceed the Intensification Area jobs growth target and the Site Allocations Local Plan makes provision for new retail and employment floorspace to deliver employment growth in accessible locations beyond the Intensification Area • the documents contain policies which seek high quality design and a good standard of amenity • the documents give effect to the spatial strategy by containing policies which protect the Green Belt, Metropolitan Open Land and open space and which promote mixed use development in town centres 	<p>N/A</p>

	<ul style="list-style-type: none"> • the documents give effect to the spatial strategy by directing development to previously developed sites in areas well served by public transport; policies seek to manage development in relation to flood risk and other climate change mitigation measures • the documents allocate previously developed sites to meet development needs and policies seek to restore/ increase access to components of the natural environment • as noted above the documents provide for mixed use development in town centre and other accessible locations; policies promote the beneficial use of Green Belt and other open space • the documents contain policies for the conservation and enhancement of heritage assets • the documents give effect to the spatial strategy which is founded on the need to make effective use of land in town centres and other locations well served by public transport, shops and services • the documents give effect to the spatial strategy which was prepared to help give effect to relevant components of other strategies, and to help achieve positive health, social and cultural outcomes; in combination with the Harrow Community Infrastructure Levy and policies for Planning Obligations, the documents – by delivering plan-led sustainable development – will support the provision of affordable housing and infrastructure 	
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1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable	Informed by evidence, the Core Strategy provides for the managed release of surplus (traditional) employment land, renewal of Harrow's employment (and in particular office) space to better meet the needs of the local market, and recognises that future employment growth will come from a	N/A

economic growth (21)	<p>range of sectors not just traditional B classes.</p> <p>The documents give effect to the spatial strategy by allowing for the consolidation of the Wealdstone SIL, allocating sites for mixed use redevelopment to deliver a range of economic uses (such as retail and office space renewal) and policies to support economic development and uses (broadly defined) in designated business use and industrial & business use areas. Other policies support ancillary economic activity at home and the development of live/work units.</p> <p>By setting out detailed criteria for the redevelopment of employment land which includes assessment of site suitability, and by setting out robust criteria for out of centre town centre development, the documents builds-in flexibility to respond to unforeseen circumstances over the plan period.</p>	
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<p>Overall, the documents give effect to the spatial strategy through plan-led regeneration of the Intensification Area (particularly focusing on Harrow town centre) and of the Borough's network of town centres.</p> <p>The AAP contains policies specific to Harrow town centre, Station Road and Wealdstone to enhance the environments and support the distinct economic roles of each of these locations. It also identifies the specific constraints and infrastructure to be brought forward on allocated sites within the Intensification Area.</p> <p>The Site Allocations Local Plan and Development Management Policies Local Plan allow for mixed use development to secure the renewal of outdated/poorly functioning office stock, and seek to apply a broader definition of economic development to designated employment use areas. As noted above, policies support ancillary economic activity at home and the development of live/work units.</p> <p>The documents also reflect engagement with large employers in the Borough by allowing for the contraction/redevelopment of the Kodak site, and by allowing for redevelopment to secure a new hospital complex for the Royal National Orthopaedic Hospital.</p> <p>The Core Strategy already identifies the critical components of infrastructure that will be needed over the plan period. The Council is separately progressing a local Community Infrastructure Levy to help fund the delivery of necessary infrastructure.</p>	N/A
Is there an up to date	The Core Strategy is underpinned by an up to date employment land study	N/A

<p>assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</p>	<p>and allows for the managed release of surplus employment land. The documents give effect to this by providing for the consolidation of the Wealdstone CIL, rationalising the boundaries of some existing business and industrial use areas (to reflect losses that have already occurred) and by setting out policy criteria for the consideration of further employment site releases. Informed by the employment land and viability studies, the Core Strategy recognizes that enabling mixed use development is needed to deliver modern economic development which meets Harrow's needs, and this is reflected in the documents' site allocations and policies.</p>	
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2. Ensuring the vitality of town centres (paras 23-27)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<p>The town centre hierarchy is established in the London Plan (2011) and reflected in the spatial strategy which directs major comparison goods retail development to Harrow town centre and supports convenience goods retail development in other centres (commensurate with role/function). The Core Strategy also makes provision for public realm enhancements within town centres.</p> <p>The documents supplement the strategy by allocating sites for retail (usually as part of mixed use) development, by revising secondary/primary frontages where the need to do so is highlighted in evidence, and by designating primary shopping areas in centres with multiple retail and other roles. The overall aim of the Core Strategy is to maintain Harrow's market share of retail expenditure over the plan period. Policies support new town centre development and provide criteria for change of use proposals, which include consideration of the vitality and viability effects of uses. The documents also give effect to the Core strategy's designation of</p>	<p>N/A</p>

	neighbourhood shopping parades in suburban areas throughout the Borough.	
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	The AAP allocates sites for retail, office other mixed use development to underpin and strengthen Harrow town centre's role as a metropolitan centre in London. Other appropriate town centre sites outside of the Intensification Area are also allocated for retail development to contribute to forecast floorspace requirements and provide retailers with a choice of location, including in centre/edge of centre sites. A separate policy supports hotel and tourism development in accordance with a sequential preference in favour of town centre/edge of centre sites. Policy criteria are also provided for the consideration of out of centre sites, should such sites be needed to secure unmet need for retail and cultural development.	N/A
Assess the impact of retail and leisure and office proposals (26)	The Development Management Policies Local Plan cross refers to the NPPF requirements for impact assessments. There is no evidence to justify setting a local floorspace threshold for impact assessment.	N/A

3. Supporting a prosperous rural economy (para 28)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Support sustainable economic growth in rural areas by taking a positive approach to new development. Planning strategies should maintain a prosperous rural economy by taking a positive approach to new development. (28)	Although not directly relevant to Harrow, the documents include a policy for the beneficial use of the Green Belt and allocate strategic, previously developed sites within the Green Belt for redevelopment. These will support economic activity in this countryside part of the Borough.	N/A

4. Promoting sustainable transport (paras 29-41)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your

		overall strategy?
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and reduce congestion by supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.(30)</p>	<p>Harrow's spatial strategy is founded on public transport accessibility – the Intensification Area coinciding with the part of the Borough with the highest PTAL scores. The documents give effect to the spatial strategy by allocating sites for a scale of development and mix of uses that exploit the accessibility and services available within the Intensification Area and town centres, and which reflect the more moderate accessibility of sites in suburban locations. In so doing the documents help to reduce the need to travel and, where travel remains necessary, encourages consideration to more sustainable transport choices.</p> <p>The spatial strategy is supported by a transport audit and the engagement of Transport for London as regional provider/regulator of transport services to/from and within Harrow. The Area Action Plan policies and site allocations will give effect to public realm improvements that support walking, cycling and bus movement within the Intensification Area. Policies provide a balanced approach to parking provision (including support for car free development, electric vehicle parking and car club proposals) and set out the requirements for Transport Assessments and Travel Plans.</p>	<p>N/A</p>

<p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p>	<p>As noted above, the documents give effect to the Core Strategy by delivering major development growth within the Intensification Area and mixed use development within town centres. Among the policy criteria for out of centre retail and cultural development is a requirement for green travel planning to enhance sustainable access.</p> <p>As noted above, policies also allow for ancillary economic activity at home and for the development of live work units where appropriate.</p>	<p>N/A</p>
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5. Supporting high quality communications infrastructure (paras 42-46)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband (43)</p>	<p>The Development Management Policies Local Plan includes a policy supporting the installation of telecommunications equipment. Criteria within the policy allow impacts to be managed in designated areas and upon residential amenity but do not rule out specific areas or locations.</p>	<p>N/A</p>
<p>Aim to keep the numbers of radio and telecommunications masts and the sites to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where possible.(43)</p>	<p>The policy directs new installations to existing masts or buildings in the first instance (but recognising the need to meet operational requirements). The policy also requires the siting and design of proposals to minimize impact upon amenity and character.</p>	<p>N/A</p>

6. Delivering a wide choice of high quality housing (paras 47-55)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).	<p>The documents demonstrate that, together with the supply of new homes already completed since the commencement of the plan period (2009) and the pipeline supply of consented schemes, the sites allocated for development within the Intensification Area and throughout the rest of the Borough meet and exceed the Core Strategy housing target. Consecutive past year completions have far exceed Harrow's annual strategic housing target, and therefore there is no requirement to demonstrate an additional 20% buffer. Nevertheless, the current forecast of housing supply, set out in the AMR, shows that Harrow can currently demonstrates a 90% buffer of deliverable sites for the next 5 years and beyond.</p> <p>In addition to the above, the Core Strategy recognises that windfall sites will continue to come forward on previously developed land. Criteria based policies in the AAP and Development Management Policies Local Plan allow for this (e.g. as house conversions, managed release of employment land and office space renewal). This provides both a contingency and scope to further exceed the minimum housing delivery target.</p>	N/A
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	The spatial strategy identifies the Intensification Area for long term growth and directs growth elsewhere to town centres and other previously developed land with good public transport accessibility. This is reflected in the AAP and Site Allocations documents which allocates sites for development (together with other sources supply described above) to meet in full and exceed the housing target for the Borough for the 17 year plan period 2009-2026.	N/A
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained	The five year housing trajectory is updated and published annually in the AMR. The AMR is supplemented by a detailed Housing Implementation Strategy, which is also published on the Council's website.	N/A

(47).		
Set out the authority's approach to housing density to reflect local circumstances (47).	The London Plan (2011) applies a residential quality density matrix applicable to all boroughs. This has informed the minimum capacities of sites allocated in the documents. The density of windfall sites will be informed by design, layout and other policy considerations.	N/A
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand (para 159)	The Core Strategy (informed by the London Plan and the West London Strategic Housing Market Assessment) sets out the local requirements for affordable housing, emphasises the need for affordable family housing, and seeks a mix of housing across the Borough and within communities. The documents give effect to this by allocating a range of sites to deliver affordable and private homes, a mix of houses and flats, and opportunities for supported housing. To enable the fullest flexibility to respond to changing needs over the plan period, policy criteria cross refer to a target mix to be set out in SPD. Policies also require lifetime and wheelchair homes so that new housing is adaptable for a range of occupiers.	N/A
Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs (50)? Do these require on-site provision or if off-site provision or financial contributions are sought, to what extent can these be robustly justified and to what extent do they contribute to the objective of creating mixed and balanced	The requirement for affordable housing is set out in the Core Strategy and is in conformity with the London Plan (2011) and is based on an up to date assessment of need as set out in the West London Strategic Housing Market Assessment. The London Plan (as published and with minor alterations) maintains the presumption that affordable housing provision will be on-site but also sets out the circumstances in which off site and financial contributions may be considered.	N/A

communities (50)?		
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	N/A	N/A
Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)	Supported by local evidence, the Core Strategy includes a presumption against garden land development.	
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	N/A	N/A

7. Requiring good design (paras 56-68)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	The AAP sets out criteria based policies on design to deliver growth and townscape change in the Intensification Area; its site allocations set out site specific design and layout considerations. The Development Management Policies Local Plan sets out policies on design & layout, landscaping, accessibility and lifetime neighbourhoods relevant to developments on allocated sites and windfall proposals.	N/A

8. Promoting healthy communities (paras 69-77)

What NPPF expects local plans to include to deliver	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences?
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its objectives		Do they affect your overall strategy?
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	The spatial strategy directs housing and employment growth, and the provision of social infrastructure, to the Intensification Area, town centres and other accessible locations. It also provides for the protection, enhancement and better linking (through the Green Grid) of open spaces, and sets out the requirements for lifetime and wheelchair homes. The documents give effect to the spatial strategy by allocating sites for mixed use development in the Intensification Area and town centres, and for housing developments elsewhere. Affordable housing is sought on qualifying sites throughout the Borough, but with a greater emphasis on intermediate housing in Wealdstone. Policies set out requirements for design and layout (including crime and safety considerations), public realm enhancements, lifetime neighbourhoods and housing mix, and seek the protection or reprovision of social and community infrastructure.	N/A
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	The documents allocate sites for reconfiguration and public access to open space, public access to sites in the Green Belt and sites for new facilities (such as schools, a new library and new health facilities). Policies seek beneficial use of the Green Belt and the provision of play space and open space as part of new development. The Community Infrastructure Levy will fund enhancement of existing open space, community facilities and services, as well as Green Grid projects. Policies also seek to protect public houses and the core shopping functions of town centres and neighbourhood parades, encourage the provision of community facilities and services in town centres and neighbourhood parades, support the provision of new community, sport and education facilities and the enhancement of outdoor sports facilities.	N/A
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	The Core Strategy identifies an overall existing and projected future deficit in all forms of open space across the Borough. The documents seek to address this by affording strong protection to open space, encouraging the reconfiguration, community access to and enhancement of open spaces to better meet local needs and to maximise use, benefits and accessibility. The Development Management Policies Local Plan incorporates recommended standards of provision for a range of open space typologies and includes policies which support provision and enhancement of sports	N/A

	<p>facilities.</p> <p>The protection and enhancement of public rights of way and strategic walking routes is addressed in the Core Strategy and are recognised where relevant as part of Green Grid projects and site allocations.</p>	
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>The Core Strategy and the documents designate and afford widespread protection to open spaces throughout the Borough. It remains open to communities to bring forward neighbourhood plans for Local Green Space designation which meet the NPPF criteria.</p>	N/A

9. Protecting Green Belt land(paras 79-92)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF’s expectations?	How significant are any differences? Do they affect your overall strategy?
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ <i>amongst</i></p>	<p>The London Plan (2011) establishes the general extent of the metropolitan Green Belt and the boundaries of Harrow’s Green Belt are established on the policies map.</p> <p>The spatial strategy directs growth to previously developed land and adequately demonstrates that Harrow’s housing needs can be met through this approach without the need to amend the existing Green Belt extent.</p> <p>The documents also identify strategic previously developed sites within the Green Belt and opportunities for increased public access to sites within the Green Belt; policies provide criteria for maintaining the openness and character of the Green Belt and promote the beneficial use of Green Belt land for Green Belt compatible uses.</p>	N/A

<i>other things</i> (85)		
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10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).	The spatial strategy directs growth and mixed use development to the Intensification Area, town centres and other accessible locations. The documents give effect to the spatial strategy by allocating sites for development in accordance with the spatial strategy and with criteria based policies for flood risk management, river restoration and sustainable building design.	N/A
Help increase the use and supply of renewable and low carbon energy (97)	The documents include policies for a district wide decentralised energy system (within the Intensification Area) and which support other proposals for decentralized energy networks and renewable energy technology. These amplify the comprehensive provisions already contained in the London Plan (2011).	
Minimise vulnerability to climate change and manage the risk of flooding (99)	The London Plan (2011) contains comprehensive provisions for climate change and flood risk management/mitigation. The documents contain policies which provide further local provisions of flood risk management, surface water attenuation and sustainable building design. The AAP contains specific provisions about the role of redevelopment in reducing flood risk in Wealdstone. Harrow's Community Infrastructure Levy will help to fund flood management infrastructure. Site allocations have been informed by sequential and (where necessary) exception testing, and site specific recommendations are included in the allocations.	N/A
Manage risk from coastal change (106)	N/A	N/A

11. Conserving and enhancing the natural environment (paras 109-125)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?

Protect valued landscapes (109)	The Core Strategy and the adopted policies map identify areas of landscape character value (areas of special character) and of biodiversity value (SSSIs, sites of importance for nature conservation) and supports the implementation (and funding of) Green Grid projects. The documents update the boundaries of biodiversity sites, allocate new sites for access to semi-natural environments, and contain policies for the protection of areas of special character and for the protection and enhancement of biodiversity/access to nature. The Core Strategy and the documents also identify important local views and landscape and historic features. Site allocations and policies ensure the protection of local views and provide for the enhancement/formation of new local views.	N/A
Prevent unacceptable risks from pollution and land instability (109)	The documents include policies for the prevention and remediation of contaminated land and for the assessment of impacts from economic activities and development.	N/A
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).	As noted above, the documents contain policies for the protection and enhancement of biodiversity/access to nature. The Core Strategy and the documents have been prepared to help give effect to Harrow's Biodiversity Action Plan which identifies local and regional priority species and habitats. The preparation of Harrow's Green Grid projects (which includes biodiversity considerations) has been integrated with the preparation of the All London Green Grid, which has involved participation with neighbouring authorities.	N/A

12. Conserving and enhancing the historic environment (paras 126-141)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Include a positive strategy the conservation and enjoyment of the historic environment, including	The documents include policies for the protection and enhancement (including securing public access) of the full range of the Borough's heritage assets and allows for enabling development where necessary to secure their active use and long-term conservation. A number of allocated	N/A

heritage assets most at risk (126)	sites will secure the future of identified assets at risk. The policies will provide a development plan basis for the preparation of supplementary planning documents and management strategies for specific assets (a number of conservation area SPDs and management strategies have already been prepared).	
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13. Facilitating the sustainable use of minerals (paras 142-149)		
What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>There are no mineral resources within the Borough. However the London Plan (2011) and the Core Strategy encourage the re-use of waste materials including aggregates.</p>	<p>N/A</p>