



**Harrow Local Development Scheme (LDS)  
Version 8 – November 2019**

## Preface

Local Planning Authorities are required to produce a Local Development Scheme (LDS). This is a rolling three-year project plan setting out all the planning documents to be produced by the authority and the timetable for their preparation. The timetable should identify specific milestones for measuring completion of each part of the document preparation process.

This revised Local Development Scheme (LDS) replaces version 7 that was brought into effect in March 2018. This LDS (version 8) is intended to provide a timetable for the updating of Harrow's Local Plan, to comply with the Localism Act 2011 and to respond to the draft New London Plan 2017. The revision also provides the opportunity to update the list of adopted local development documents.

**Important Note:** This document replaces all previous versions of the Local Development Scheme previously brought into effect since June 2005 as detailed below:

<b>LDS version</b>	<b>Date brought into effect</b>	<b>Date cancelled / superseded</b>
1	June 2005	November 2006
2	November 2006	November 2007
3	November 2007	January 2011
4	January 2011	July 2012
5	July 2012	March 2014
6	March 2014	April 2018
7	April 2018	October 2019
8	November 2019	current

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# 1. Introduction

- 1.1 Local Planning Authorities are required to produce a Local Development Scheme (LDS). This is a rolling three-year project plan setting out all the planning documents to be produced by the authority and the timetable for their preparation. The timetable should identify specific milestones for measuring completion of each part of the document preparation process.
- 1.2 This scheme does not include planning policies but is to be used to find out which policy documents apply in the borough and their status. If there are any ad hoc changes to the production of any documents, these will be published online at: <https://www.harrow.gov.uk/planning-developments/local-development-scheme>.
- 1.3 The Localism Act 2011 allows Local Planning Authorities to adopt their own Local Development Schemes without approval from the Secretary of State and Mayor of London. However, it makes provisions for certain interventions by the Secretary of State or Mayor of London. It also maintains the requirements to produce an LDS and keep it up to date as set out by the Planning and Compulsory Purchase Act 2004.
- 1.4 This LDS covers the period 2019 - 2022 and supersedes the Council's adopted LDS published in March 2018.

## Current Local Plan

- 1.5 The Council has adopted and implemented the following development plan documents which form Harrow's Local Plan in full:
  - (a) **Core Strategy (February 2012)** - sets out the long-term vision of how Harrow, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for delivering that vision. In particular, it identifies the broad locations for delivering housing and other strategic development needs such as employment, retail, leisure, community facilities and other uses. It also sets the context for the other policy documents that make up the Harrow Local Plan.
  - (b) **Harrow and Wealdstone Area Action Plan (July 2013)** - prepared jointly with the GLA and other partners, it sets out a comprehensive set of policies, proposals and site allocations for development within the Harrow and Wealdstone Intensification Area, which includes the town centres of Harrow and Wealdstone, the corridor between them, and the business land surrounding Wealdstone. It includes major redevelopment opportunities and supporting social and physical infrastructure, and sets out the planning framework promoting significant change, and where applicable detailed development management policies.
  - (c) **Development Management Policies Local Plan (July 2013)** - contains detailed policies that planning applications for development or

land use will be assessed against. The policies are generally criteria based and focus on giving effect to the strategic objectives and policies of the Core Strategy.

- (d) **Site Allocations Local Plan (July 2013)** - sets out the allocated sites except for those set out in the Area Action Plan. It identifies the locations and sites for specific types of development in order to ensure the vision, objectives and strategy of the Core Strategy are implemented. The broad parameters for development of each site are listed covering land use and development criteria.
- (e) **West London Waste Plan (July 2015)** - This is a joint Local Plan document prepared by the six west London Boroughs of Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond. The joint West London Waste Plan (WLWP) identifies and safeguards sufficient sites for waste management facilities in the area to deal with West London's own waste up to 2031. The Plan also contains policies against which to assess proposals for waste management facilities.

1.6 The above are accompanied by an adopted **Policies Map** that illustrates particular land uses throughout the Borough including areas for protection such as open space and conservation areas, as well as employment and residential activities. It also identifies key sites for development ('site allocations').

1.7 These documents can be found on the Council's website: <https://www.harrow.gov.uk/planning-developments>.

### London Plan

1.8 The London Plan 2016 (as amended) also forms part of the Harrow development plan, against which planning applications are assessed. The current London Plan can be found here: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2016\\_jan\\_2017\\_fix.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf).

1.9 Following his election in May 2016, the new Mayor of London commenced a full review of the London Plan, which is expected to be adopted / published in Spring 2020. The draft New London Plan and updates on its progress can be found here: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>.

### Neighbourhood Plans

1.10 Neighbourhood Plans also form part of the Council's development plan. At present there are no neighbourhood plans being progressed in Harrow. Applications to designate a neighbourhood area and neighbourhood forum on Harrow Hill were made in September 2017 but withdrawn before the Council decided the applications.

## 2. Background to Plan Making

### Local Development Framework and the Local Plan

- 2.1 The Planning and Compulsory Purchase Act 2004 introduced the Local Development Framework which comprises a 'portfolio' of local development documents – some containing policies (development plan documents) and others containing supplementary guidance to those policies (supplementary planning documents).
- 2.2 However, the above terms are no longer used in the new national guidance. The National Planning Policy Framework ("NPPF") was first published in March 2012, substantially updated in July 2018 and further updated in February 2019. The NPPF provides guidance on the preparation of Local Plans, which it defines as the plan for the future development of the local area, drawn up by the Local Planning Authority in consultation with the local community. Current Core Strategies or other planning policies (i.e. those listed in paragraph 1.5 above), which under the regulations would be considered to be Development Plan Documents, form part of the Local Plan. Therefore, documents which previously were referred to as the Harrow Local Development Framework are now referred to as the Harrow Local Plan.
- 2.3 The NPPF requires Local Planning Authorities to produce a Local Plan for their area. The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017/1244 requires local plan documents to be reviewed every 5 years. These can be reviewed earlier in whole or in part to respond flexibly to changing circumstances. Any additional Development Plan Documents should only be used where clearly justified. Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.
- 2.4 The NPPF and associated National Planning Practice Guidance (NPPG) can be found here: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 2.5 The LDS contains details of the production timetable of the documents comprising the Local Plan.

### The Local Development Scheme

- 2.6 The LDS (this document) is a 3-year project plan setting out when the existing DPDs forming the Local Plan are to be revised and consulted upon. It allows the community and stakeholders to find out about the Council's future intentions for the planning of the borough and to participate in the planning making process.

## **Plan Making**

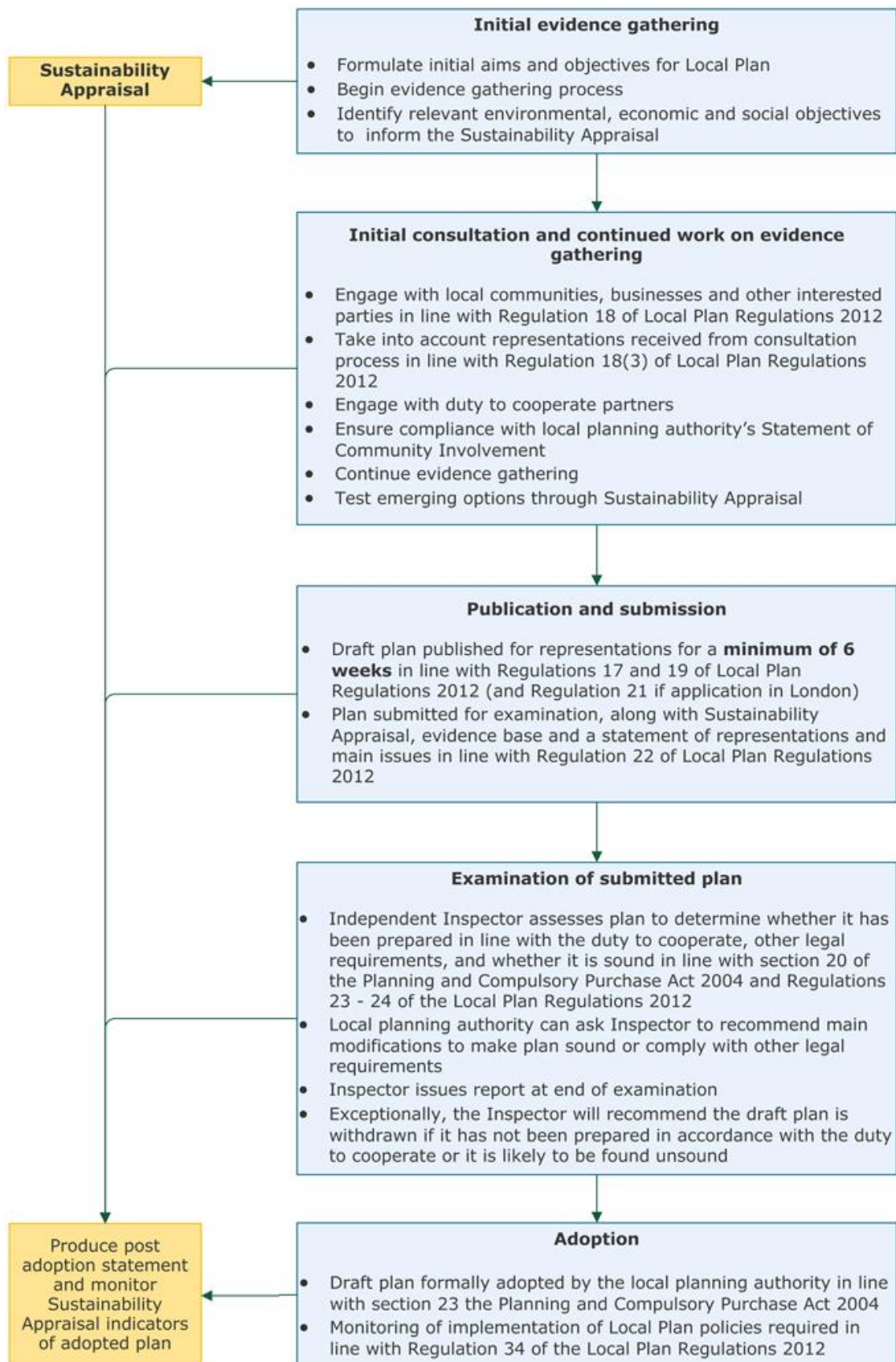
- 2.7 Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be based on a proportionate evidence base which includes adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 2.8 All of the Development Plan Documents and SPDs which the Council intends to update must also be:
- (a) consistent with national planning policies (unless there is a robust reason for why Harrow requires any variation to those policies);
  - (b) in general conformity with the Mayor's adopted London Plan; and
  - (c) must conform with the Spatial Strategy within the Plan.
- 2.9 The Council is required to identify a clear chain of conformity between documents. The Mayor provides an opinion as to the general conformity of Harrow's Local Plan with the London Plan, which is currently found to be in conformity. The Mayor of London published a completely new draft London Plan in December 2017, with a view to adopting (publishing) a final version in Spring 2020, once it has been through an Examination in Public by the Planning Inspectorate. The Council intends to update its Local Plan in response to the draft London Plan to ensure continued conformity.
- 2.10 As noted above, there are two types of Local Development Documents: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The plan making process for each is outlined below.

## **Development Plan Documents (Local Plans)**

- 2.11 Development Plan Documents include adopted Local Plans, neighbourhood plans and the London Plan. These plans are statutory documents and are scrutinised by a Planning Inspector at an examination and can comprise a Local Plan, Core Strategy, Site-specific Allocations, and Area Action Plans.
- 2.12 The Government's current intention is to have both Core Strategies and other DPDs all combined into one Local Plan document and so the Council intends to review all the adopted DPDs listed in paragraph 1.5 above (apart from the Joint Waste DPD) concurrently to enable this.
- 2.13 The key stages of Local Plans preparation are set out in Figure 1 below.



**Figure 1 – Key Stages of Local Plan Preparation**



Source: National Planning Practice Guidance (Paragraph: 005 Reference ID: 12-005-20140306, Revision date: 06 03 2014, retrieved 31 01 2018)

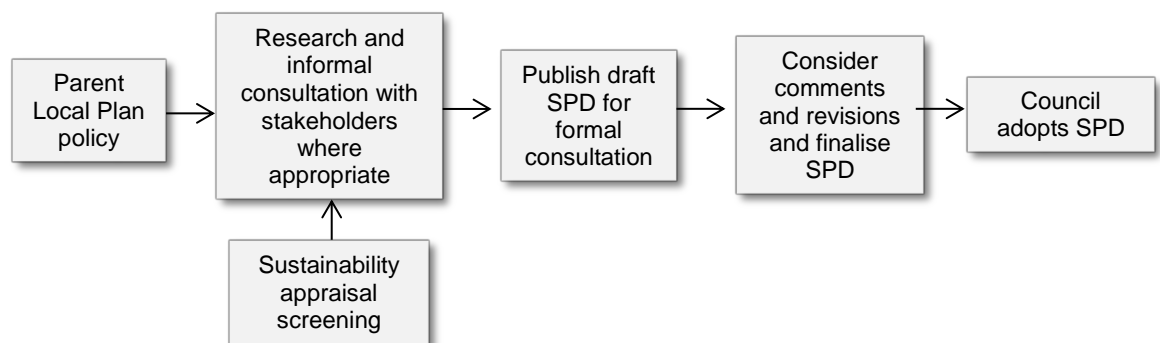


2.14 In some instances such as a full Local Plan review, Local Planning Authorities may choose to split the initial stage of statutory consultation (under Regulation 18 of the 2012 Regulations) into two rounds. The first round of consultation is on issues for the review. This will highlight and seek views on issues and alternatives for the more fundamental policy changes as well as proposed new areas of policy, but will not include detailed policy wording. This provides an opportunity for consultees to say whether they think the Council has identified the right issues for the review. The second round of consultation is on the actual draft Local Plan.

### Supplementary Planning Documents

2.15 Supplementary Planning Documents (SPDs) are non-statutory plans that are not scrutinised by a Planning Inspector and can be formally adopted by the Council's Cabinet. SPDs do not set policy, but expand upon or explain how policies in the adopted Local Plan should be applied, and are capable of being a material planning consideration in planning decisions, but are not part of the development plan. The key stages of SPD preparation are set out in Figure 2 below.

**Figure 2 – Key Stages of Supplementary Planning Document Preparation**



2.15 Although no longer a statutory requirement to include SPDs in the LDS, the current SPDs are listed below in order to give a full account of Harrow's planning policies and associated supplementary guidance.

- Harrow on the Hill Conservation Areas SPD (May 2008)
- Pinner Conservation Areas SPD (December 2009)
- Residential Design Guide SPD (December 2010)
- Garden Land SPD (April 2013)
- Planning Obligations and Affordable Housing SPD (October 2013)
- Locally Listed Buildings SPD (December 2013)
- Stanmore and Edgware Conservation Areas SPD (December 2013)
- Harrow School SPD (July 2015)
- Harrow Weald Conservation Areas SPD (February 2016)

- 2.16 It should be noted that the Conservation Area SPDs listed above include Character Appraisals and Management Strategies for each individual Conservation Area covered by the SPD, as appendices. These appendices are updated more frequently than the overall SPD.
- 2.17 The Council intends to prepare and revise a number of SPDs over the coming years, especially to aid in site delivery. The following is a proposed list of the further SPDs:
- Householder Extensions and Conversions SPD
  - Small Sites Design Code SPD (prepared to reflect the requirements of the draft New London Plan 2017).
  - Revised Planning Obligations and Affordable Housing SPD.
  - Edgware Town Centre SPD (prepared jointly with Barnet Council)
- 2.18 The timetable for the production or revisions of SPDs is provided on the relevant pages of the Council's website.

### **Supporting evidence and other planning documents**

- 2.19 Whilst not forming part of the Local Plan, the Council has also produced other supporting documents to aid in the preparation or implementation of Local Plan policies:
- (a) A detailed evidence base
  - (b) The Statement of Community Involvement (revised and adopted March 2013) (proposed to be updated in 2019)
  - (c) Local Development Order for North Harrow (now lapsed)
  - (d) Sustainability Appraisal & Strategic Environmental Assessment
  - (e) Local Plan Policies Map (Hard and online versions last updated July 2013)
  - (f) Community Infrastructure Levy: Charging Schedule (Implemented 1st October 2013)
  - (g) Authority's Monitoring Report (prepared annually)

### **Evidence Base**

- 2.20 In order to carry out the preparation of the Local Plan, the Council prepares and maintains an up-to-date, sound evidence base. Necessary research has already been conducted, and will be supplemented by research undertaken by partners, other organisations, and the community. Providing a sound and comprehensive evidence base is fundamental to developing sound planning documents.
- 2.21 The current Harrow Local Plan evidence base can be found on the Council's website at: <https://www.harrow.gov.uk/planning-developments/london-development-framework-evidence-base>.

### **Statement of Community Involvement (SCI)**

- 2.22 A significant concern of planning policies is to improve community and stakeholder involvement from the outset so they reflect a collective vision. This commitment is reinforced by the requirement for all Local Authorities to produce a Statement of Community Involvement (SCI). The SCI details how the community and stakeholders will be involved in the preparation, alteration and review of the Local Plan, as well as the consideration of minor and major planning applications.
- 2.23 The Harrow SCI was first adopted in August 2006. Given the changes to the planning system since 2006, the Harrow SCI was revised, updated and re-adopted in March 2013 and is available on the Council website at: <https://www.harrow.gov.uk/planning-developments/local-development-scheme?documentId=12692&categoryId=210273>.
- 2.24 It is proposed to update the SCI in 2020, in advance of consultation on the review of the Local Plan identified in this LDS.

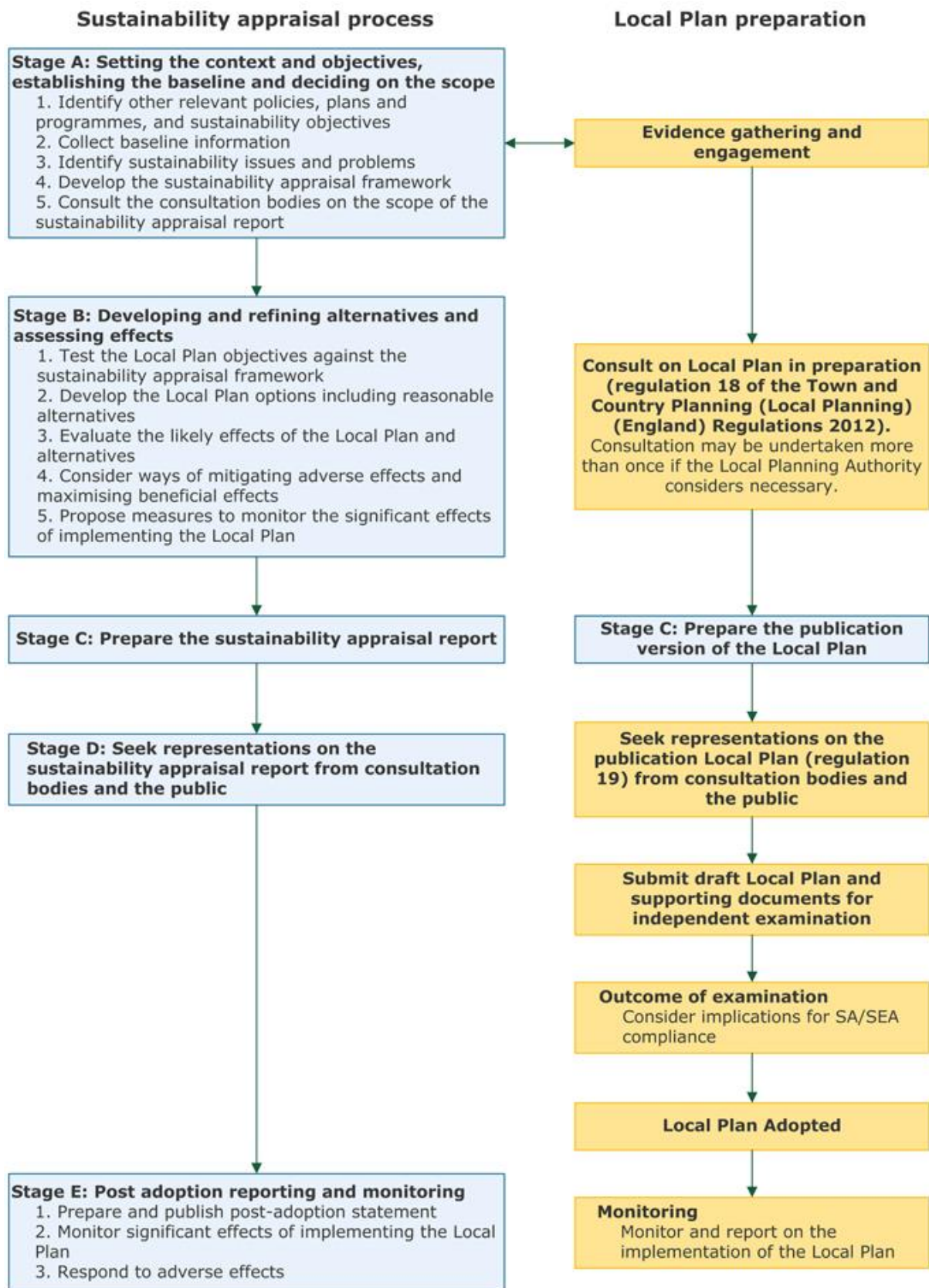
### **Local Development Order**

- 2.25 Local Development Orders (LDO) were introduced with the Planning and Compulsory Purchase Act 2004 and allow local authorities to extend permitted development rights for certain forms of development within a defined area (i.e. to remove the need to obtain planning permission for the types of development stated in the LDO). There are no current LDOs in operation in the Borough. The Council adopted a LDO in North Harrow, which started on 1 July 2012. The LDO was however only limited to a three year period and has therefore now expired. It was not renewed as it was considered to have achieved its objective to reduce the level of vacant premises within the centre, relative to other centres in the borough.

### **Sustainable Appraisal (SA) and Strategic Environmental Assessment (SEA)**

- 2.26 Sustainability Appraisal (SA) is required for all Local Plan documents. It is an integral component of all stages of plan preparation. The purpose of a SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA embraces economic, environmental and social objectives, and therefore has a wider scope than Strategic Environmental Assessment (SEA), which is required by EU Directive (2001/42/EC) and only concentrates on environmental effects.
- 2.27 Figure 3 provides an overview of the SA/SEA process relative to the Local Plan preparation process.

**Figure 3: Sustainability appraisal process relative to Local Plan process**



Source: National Planning Practice Guidance (Paragraph: 013 Reference ID: 11-013-20140306, Revision date: 06 03 2014, retrieved 31 01 2018)

- 2.28 Work on producing a Local Plan cannot proceed without corresponding work on the SA/SEA. Both the draft Local Plan and the SA will be made publicly available for consultation at the same time and comments invited on both. The findings of the SA in informing each policy within the plan will be a material consideration in determining soundness of the documents at the examination in public.

### **Local Plan Policies Map**

- 2.29 The Policies Map identifies site allocations and areas of planning constraint, such as the Green Belt and other local and national environmental designations. The policies map is updated as the Local Plan is prepared or revised so as to illustrate, graphically, the application of the policies of the Local Plan. The Policies Map can be found at: <https://www.harlow.gov.uk/planning-developments/adopted-policies-map?documentId=12656&categoryId=210273>.

### **Community Infrastructure Levy (CIL)**

- 2.30 Harrow's CIL came into effect on 1st October 2013 and enables the Council to levy a charge on certain types of new development to help fund improvements to local infrastructure such as schools, transport, green spaces, health and leisure facilities necessary to support new development and ensure these create sustainable communities. Harrow's CIL is an additional levy on top of the London Mayor's existing Crossrail CIL (which was revised in 2019). Further details on the Harrow CIL are available on the Council's website at: <https://www.harlow.gov.uk/planning-developments/community-infrastructure-levy>.
- 2.31 It is intended that the Harrow CIL charging schedule is updated in parallel with the Local Plan review, since development viability considerations are intergral to both.

### **Authority's Monitoring Report (AMR)**

- 2.32 The Localism Act 2011 requires monitoring of both the production and implementation of the plans through Monitoring Reports. The AMR is published yearly and assesses:
- (a) The state of the Borough's environment, identifying development trends, patterns of land-use, as well as transport and population/ socio-economic trends in order to provide a 'baseline' for sustainability appraisal, the identification of issues or problems and the context reviewing development plan policies or policy omissions;
  - (b) The implementation of the Local Development Scheme and whether revisions to the scheme are necessary;
  - (c) The extent to which the development plan objectives and policies are being achieved; and
  - (d) Development management performance.

2.33 Harrow's Authority's Monitoring Reports are available on the Council's website at: <https://www.harrow.gov.uk/planning-developments/local-development-scheme?documentId=12692&categoryId=210273>.



### 3. Harrow's Local Plan

#### Current Plan

3.1 The schedule below outlines the current Harrow Local Plan and indicates how these relate to each other and with national and regional planning policy (i.e. the 'chain of conformity').

#### Harrow's Local Plan

Document Title	Status	Brief Description	Geographical Coverage	Chain of Conformity	Date of Adoption
Core Strategy	DPD	Sets out the Council's Spatial Vision, Strategic Objectives and Strategic Policies. It paints the 'big picture' for future change in Harrow, taking account of social, environmental and economic issues.	Borough Wide	General conformity with the National Planning Policy Statement and the London Plan  All other LDDs will conform with Core Strategy	16 <sup>th</sup> February 2012
Development Management Policies	DPD	Contains detailed criteria based policies that planning applications for development or land use will be assessed against	Borough Wide	To conform with Core Strategy	4th July 2013
Site Allocations	DPD	Identifies the locations and sites, except for those set out in the Area Action Plan, for specific types of development in order to ensure the vision, objectives and strategy of the Core Strategy are implemented.	Borough outside of the Harrow & Wealdstone Intensification Area	To conform with Core Strategy	4th July 2013
Harrow and Wealdstone Area Action Plan	DPD	Jointly prepared with the GLA and other partners, it sets out a comprehensive set of policies, proposals and site allocations for development within the Harrow & Wealdstone Intensification Area	Harrow & Wealdstone Intensification Area	To conform with Core Strategy and the London Plan designation	4th July 2013
West London Waste DPD	DPD	Joint waste plan for West London, identifying and safeguarding sufficient sites for waste management facilities in the area to deal with West London's own waste up to 2031.	West London Wide	General conformity with the National Planning Policy Statement and the London Plan	July 2015



## Review of the Harrow Local Plan

- 3.2 As noted in the Local Plan schedule above, the Council has a fully adopted Local Plan, comprising five development plan documents and accompanying Policies Map. However, it is a requirement of the Government to keep Local Plans up to date. Given the Mayor of London is producing a new London Plan, the Council intends to update (and consolidate) all the documents forming the current Local Plan simultaneously to ensure continued conformity with the London Plan. The updated documents will also reflect recent changes to national policy and ensure Harrow can continue to deliver upon its housing target.

### *Approach to the review*

- 3.3 A number of policies in the Local Plan will need to change to take account of the legislative and policy changes listed above, as well as changed circumstances in the borough and new evidence. A small number of new policies are also likely to be needed. However, many of the existing policies in the Local Plan are considered to remain current and fit for purpose (based on continuing conformity with national and regional policy and ongoing monitoring through the Authority's Monitoring Report) and these will be incorporated into the new Local Plan. Given the scale of the proposed increase in the London Plan housing target for Harrow, the nature of the proposed source of this additional housing (i.e. 'suburban intensification') and the approach to the drafting of the new London Plan (which is drafted to allow immediate implementation of its policies through decision making on planning applications), it is considered that a full review of the current Harrow Local Plan is required.
- 3.4 The National Planning Policy Framework makes clear that the Government's preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). This is a significant change from the previous Government's approach of a number of separate documents comprising the Local Development Framework, evident by the list of Harrow Local Plan documents listed above. While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so. It is therefore envisaged that the new Local Plan will involve a reduced number of documents, with the Core Strategy, Development Management Policies and Site Allocations being combined into a single document. The existing Harrow and Wealdstone Area Action Plan may remain a separate, updated document, or alternatively be included in the main Local Plan document.
- 3.5 With a single Local Plan being prepared, the document will contain strategic priorities (i.e. housing, employment etc) and strategic policies to deliver these; these strategic policies will be clearly distinguished from non-strategic policies, as required by the new National Planning Policy Framework.

## Timetable for the updating of the Harrow Local Plan

3.6 Outlined below is the proposed timeframe for updating the Harrow Local Plan:

<b>Harrow Local Plan</b>	
<b>Role and Subject</b>	<p>Adopted between 2012 and 2013, the table above (at paragraph 3.1) outlines the role and subject of each of the constituent documents making up the Harrow Local Plan. Since adoption, new growth requirements for London and Harrow have been set out in the London Plan and there have been some significant changes to national planning policy and guidance and permitted development rights. A review is therefore required to update, in particular, the quantum of housing to be delivered and policies relating to the retention of employment land, as well as to take account of new evidence from updated evidence base studies.</p> <p>It is envisaged that the new Local Plan will replace and consolidate into one document the existing Core Strategy, Development Management Policies and Site Allocations documents. The Harrow and Wealdstone Area Action Plan will also be updated / replaced, but may potentially remain a separate document.</p> <p>The Policies Map will be updated to reflect the policies in the new Local Plan, including any changes to their extent.</p> <p>It is intended that the new Harrow Local Plan will align with the same planning period as the draft New London Plan, namely to 2041.</p>
<b>Geographical Coverage</b>	Borough Wide
<b>Status</b>	DPD
<b>Conformity Chain</b>	National Planning Policy Framework (NPPF) London Plan consolidated with alterations (2016) and draft New London Plan 2017
<b>Key Milestones</b>	
Evidence base preparation	January 2018 – early 2022
Regulation 18 (Part 1): Consultation on the issues and options to be addressed in the Local Plan review	April-May 2020 (minimum 6 weeks)
Regulation 18 (Part 2): Consultation on Draft Revised Local Plan	Spring 2021
Regulations 19 and 20: Pre-submission consultation (six weeks for representations)	Spring 2022
Regulation 22: Submission of the Local Plan and representations to Secretary of State	Autumn 2022
Independent Examination – hearings	Winter 2022
Receive Inspector’s report	Spring 2023
Adoption	Spring 2023

- 3.7 It is proposed that the initial stage of statutory consultation (under Regulation 18 of the 2012 Regulations) will be split into two rounds. The first round will be consultation on issues for the review (referred to in this LDS as 'Regulation 18 part 1'). This will highlight and seek views on issues and alternatives for the more fundamental policy changes as well as proposed new areas of policy, but will not include detailed policy wording. There will be an opportunity for consultees to say whether they think the Council has identified the right issues for the review. The second round of consultation will be on a Draft Revised Local Plan (referred to in this report as 'Regulation 18 part 2'), which will include the draft Local Plan.
- 3.8 This two-stage Regulation 18 consultation will be followed by statutory pre-submission publication of the draft Plan (Regulation 19) and the invitation for representations to be submitted about that version (Regulation 20). This would take place after the Council has agreed the version of the document that it wishes to submit to the Government for examination.
- 3.9 The first round of public consultation is proposed to start in April 2020 and last a minimum of six weeks. This will explore the key issues to be considered in the review, which are: housing growth (including 'suburban intensification') and infrastructure; affordable housing; housing for older people; business and jobs (including retention of industrial floor space and 'industrial intensification'); town centres; air quality; and transport.
- 3.10 The outcome of the first round of public consultation on issues for the review will be assessed and considered prior to the second round of public consultation on the Draft Local Plan. This assessment will also have to take account of the draft New London Plan, revised National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and of the recommendations and feedback from sustainability appraisal of the draft documents.
- 3.11 The proposed timetable for the review of the Harrow Local Plan is set out above. Some aspects of this timetable are not within the control of the Council, particularly the timing of the examination hearing and the length of time the Inspector takes to consider matters and issue his/her report.
- 3.12 Given that the London Plan is undergoing a full review and contains proposals that have significant implications for the Harrow Local Plan, the timing of the review of the Harrow Local Plan set out above has been designed to follow behind the London Plan. This means that general conformity will be tested against the new London Plan rather than the existing version, which will become out of date / superseded.

## 4 Managing the Local Plan Process

### Governance

- 4.1 The effective implementation of this LDS will require the consideration of the most effective governance support procedures. According to the Council's constitution, full Council approval is required prior to any consultation or submission of the Local Plan. Harrow Council operates a Cabinet Structure. Prior to documents being agreed by full Council, the Local Plan must first be reported to the Planning Policy Working Group (Member panel), before being recommended to Cabinet and ultimately full Council. The Planning Policy Working Group is charged with overseeing the preparation and implementation of the LDS and making recommendations to the Cabinet.
- 4.2 On occasions the Council's Overview and Scrutiny Committee may 'call in' decisions, prior to being considered by Cabinet. The Overview and Scrutiny Committee is charged with ensuring the Council is accountable for its decisions processes.
- 4.3 The timeframe necessary to comply with the Council's in house processes and procedures has been included within timeline given for preparing the Local Plan, although where necessary this will include special committee meetings.

### Staff and Resource Allocated to the Preparing the Local Plan

- 4.4 The Council's Planning Policy Team will take the lead on preparing all Local Plan documents. This includes the Local Plan and most SPDs but also the SA/SEA, thematic studies, and the preparation of evidence base studies to support the Local Plan. Where appropriate, the Council will participate in joint evidence base work with the West London Alliance in order to gather evidence at a sub-regional level, respond to its duty to co-operate with relevant stakeholders, strive for a co-ordinated and coherent approach to planning within West London and benefit from the economies of scale that arise from joint-working.
- 4.5 The Policy Team will be supported where necessary by the Development Management, Regeneration and Design, specialist officers within the Council, and the Economic Development and Research teams. Where necessary, specialist external consultants may also be used, especially for technical background evidence base studies.
- 4.6 Overall management responsibility for the Local Plan will be with the Chief Planning Officer. It will be the responsibility of the Chief Planning Officer to allocate sufficient staff from within the Planning Service and to negotiate for corporate staff resources where necessary.

## Risks

4.7 Outlined below are key risks identified in progressing the Local Plan review and meeting the timeframes in this LDS:

- (a) *The “soundness” of DPDs (Local Plan documents)* – to be found sound, Local Plan documents are to comply with statutory process, government policy and be in general conformity with the London Plan. Since the last LDS was prepared significant legislative changes have taken place. In reviewing Harrow’s Local Plan it will be necessary to ensure that Harrow’s documents continue to take account of changes as and when they occur to ensure that they remain applicable come adoption and implementation.
- (b) *Committee process* – The lead in times for Local Plan documents is significant, and involves significant staff resource. In some instances it may be necessary to hold additional meetings of the Planning Policy Working Group or Full Council to ensure reporting timeframes and ultimately Local Plan milestones are met.
- (c) *Evidence base* – A key requirement of the Local Plan is that it is based on a robust and up-to-date evidence base. Significant resource has been invested in compiling a robust evidence base in support of the current Local Plan and the proposed review. It will be necessary to undertake a review of evidence base studies due to changing circumstances (e.g. to take account of the impact of office to residential prior approval changes of use on office supply). However, if the timetable for revising the Local Plan slips or is slowed, there is a risk that, by the time of submission, the evidence on which the document is based would be out of date. A further risk arises where reforms to the planning system are proposed, and prior to primary legislation being enacted, such changes are given effect through amendments to national planning policy. Such changes often result in requirements upon local planning authorities to prepare new studies to assess and address relevant national issues at the local level.

The above risks are not new to planning policy, and the Council will need to manage the Local Plan timetable whilst ensuring the supporting evidence base remains as up-to-date and robust as is necessary

- (d) *Resourcing* – resourcing within the Planning Policy Team is currently significantly less than that available when the current Local Plan was prepared. Difficulties in identifying additional funding and recruiting suitably qualified and experienced planners has resulted in slippages in the timeframes for the Local Plan review since the last LDS (Version 7 - March 2018). Additional resources (internal and external) have been identified and recruitment of additional planners (2 FTE) is anticipated to occur mid-2019.

- (e) *Implementation and Delivery* – For plans to be found ‘sound’ they must be considered to be deliverable. This will be managed through justification in the supporting text to policies but may also require other corporate plans and strategies to clearly articulate the reasons for this. The Local Plan policies are subject to monitoring and reporting and the policies can be reviewed to take account of changes in circumstances. The Government has announced potential punitive measures for not delivering against housing targets within the London Plan / Local Plan, including the requirement to prepare action plans, identification of additional buffer requirements within the borough’s five year housing supply, the application of the presumption in favour of sustainable development, and intervention by Government in the Local Plan process.

### **Monitoring and Review**

- 4.8 The LDS will be subject to both annual and in-year monitoring to ensure the timetables outlined are being met. Where this indicates otherwise, the Planning Policy Team will analyse the reasons for this and determine whether actions can be taken to bring the Local Plan back into line with the programme. Where the analysis highlights significant variance that cannot be overcome, the LDS will need to be revised accordingly to ensure it remains up to date.