



# Local Plan Integrated Impact Assessment

## Regulation 19 Integrated Impact Assessment Report

### London Borough of Harrow Council

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## Basis of Report

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<b>Appendix D</b>	<b>Policies Assessment Matrix (available electronically only)</b>
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<b>Appendix F</b>	<b>Sites Assessment Matrix (available electronically only)</b>
<b>Appendix G</b>	<b>HRA Report</b>



## Acronyms and Abbreviations

Glossary	
Development Plan	The statutory framework for planning decisions, comprising the Development Plan Documents prepared by local planning authorities (this includes County Council, District Councils) and in London boroughs such as Harrow, as well as the London Plan, which is the statutory Spatial Development Strategy for Greater London that is prepared by the Mayor of London (“the Mayor”).
DPD (Development Plan Document)	A document containing local planning policies or proposals which form part of the Development Plan, which has been subject to independent examination.
EqIA (Equalities Impact Assessment)	A way of measuring the potential impact (positive, negative, or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010.
Habitats Regulations Assessment (HRA)	An assessment in accordance with the Habitats Regulations (The Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490)) to ascertain the significance of potential impacts of a plan on relevant European sites. The assessment determines whether the plan would adversely affect the integrity of the sites in terms of its nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects.
HIA (Health Impact Assessment)	A way of assessing the potential health impacts of policies, plans and projects. The HIA process is designed to help decision-makers ensure that health and wellbeing is being properly considered in planning policies and proposals. HIA is not a statutory requirement of the plan preparation process.
In Combination Effects	Where policies, plans or projects affecting the same area might affect European sites in combination with each other.
IIA (Integrated Impact Assessment)	A combination of the SA, SEA, HIA and EqIA requirements, the IIA will test the Local Plan policies and their reasonable alternatives to help develop the most sustainable plan. It will also identify potential impacts on the protected groups and health outcomes, and identify opportunities within the power of the Local Plan



<b>Glossary</b>	
	for more positive outcomes for protected groups and health.
LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents.
Local Plan	The Local Plan forms part of the statutory development plan for the Borough and informs decisions on planning applications.
NPPF (National Planning Policy Framework)	Published in December 2023, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. The NPPF is supported by the National Planning Practice Guidance (NPPG).
Proposals/Policies Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents.
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.





## 1.0 Introduction

### 1.1 Background

The London Borough of Harrow Council (LBHC) is preparing a Local Plan, to manage the future development and growth of the local authority area between 2021 and 2041. This is intended to replace the Core Strategy (adopted 2012), Development Management Local Plan (2013), Harrow and Wealdstone Area Action Plan (2013) and Site Allocations Local Plan (2013) documents and associated Policies Map. It may also potentially replace existing Supplementary Planning Documents (SPDs) depending on any Government proposals that impact upon their ongoing use. This new Local Plan will be produced in general conformity with the London Plan (2021). It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF) (December 2023) and National Planning Practice Guidance (NPPG).

The Harrow Local Plan is subject to Integrated Impact Assessment (IIA) (see section 1.3) which is being undertaken by SLR Consulting Ltd working closely with the Council's planning policy team. This IIA report relates to the Regulation 19 draft Harrow Local Plan. An integral part of the IIA is the Sustainability Appraisal (SA) required under Section 19 of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework (December 2023). This must also incorporate the requirements of the Strategic Environment Assessment (SEA) Directive.

Strategic Environmental Assessment (SEA) in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

The IIA report is being carried out to help integrate sustainable development into the Local Plan. It is being published and consulted on under Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012. IIA assesses the significant environmental, social, economic, health and equality effects of the Local Plan, the "reasonable" alternatives to the Plan's strategy, policies and proposals, and the reasons for discounting alternatives.

### 1.2 This document

This document is the IIA Report for the draft Harrow Local Plan at the Regulation 19 of the plan-making process. The remaining sections of this document are structured as follows:

- **Section 2: Methodology** describes the approach to the IIA;
- **Section 3: Scope and Content of the draft Local Plan** describes the scope of the plan and sets out its vision and objectives;
- **Section 4: Review of Other Programmes and Plans** describes the policy context that the IIA is being based on. This section is supported by Appendix A;



- **Section 5: Summary of Baseline Data** describes the baseline including key sustainability issues, data gaps and future evolution of the baseline. This section is supported by Appendix B;
- **Section 6: Alternatives** describes the alternatives identified and assessed, the findings of the assessment of alternatives and the reasons for choosing the preferred alternatives. This section is supported by Appendices C and E;
- **Section 7: Assessment of the draft Local Plan Policies** identifies the potential significant effects of the Proposed Submission Local Plan policies. This section is supported by Appendix D;
- **Section 8: Assessment of Site Options** identifies the potential significant effects of the Proposed Submission Local Plan sites. This section is supported by Appendix F;
- **Section 9: Equalities Impact Assessment** presents a discussion of the Local Plan policy findings which relate to the EqIA part of the IIA;
- **Section 10: Health Impact Assessment** presents a discussion of the Local Plan policy findings which relate to the HIA part of the IIA;
- **Section 11: Habitats Regulations Assessment** presents a summary of the HRA Report. This section is supported by Appendix G;
- **Section 12: Potential Cumulative Effects** describes cumulative effects which may arise from the local plans of neighbouring boroughs, as well as projects occurring in and around Harrow;
- **Section 13: Mitigation Measures** presents the measures put forward to offset potential significant negative and uncertain effects of the policies and sites and improve their sustainability performance;
- **Section 14: Monitoring** presents proposals for monitoring the potential effects of the draft Local Plan; and
- **Section 15: Next Steps** sets out the next activities in the IIA and Local Plan.

### 1.3 Integrated Impact Assessment

The requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) have been incorporated into one integrated assessment – an IIA. The IIA has tested the Local Plan objectives, policies, potential sites and their reasonable alternatives against a suite of environmental, socio-economic, equalities and health objectives to identify whether there is the potential for significant effects (either positive or negative), and thus provide mitigation in order to promote sustainable development.

The IIA has identified potential impacts on the protected groups and has identified opportunities within the power of the Local Plan to achieve more positive outcomes. It has also identified the key health issues of the local population and the links between planning and health. The IIA baseline contains relevant and sufficient information about health and equalities on which to undertake the IIA. This assessment has helped to inform the choice of vision, objectives, policies for the scale, locations of new



development and development management policies, with the objective of producing a more sustainable plan which addresses issues related to health and equalities.

## **1.4 Sustainability Appraisal and Strategic Environmental Assessment**

A Sustainability Appraisal (SA) of Development Plan Documents (DPDs) is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including DPDs. The purpose of the SEA Directive is to ensure a high level of environmental protection, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development. Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process as set out in the Planning Practice Guidance (updated 2019).

The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA ‘testing’ of the DPD policies and their reasonable alternatives helps to develop the most sustainable policies and proposals as an integral part of the plan's development. The Local Plan objectives, policies and development sites are appraised against a set of objectives to identify whether there is the potential for significant effects (either positive or negative) and recommendations are proposed to mitigate any significant adverse effects. Guidance for Sustainability Appraisal (SA) sets out an objectives-led, staged process. The SA process can be adapted to integrate Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

## **1.5 Equalities Impact Assessment**

The EqIA identifies the likely effects on discriminatory practices, the potential to alter the opportunities of certain groups of people and/or effects on relationships between different groups of people which could arise as a result of the policies and site allocations included within the Local Plan. The Equality Act sets out a series of “protected characteristics” which help identify which groups of people (or individuals) may suffer discrimination:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Gender (male/female);
- Sexual orientation.



The assessment identifies whether people with protected characteristics would be disproportionately or differentially affected by the proposals. Definitions of this are as follows:

- **Disproportionate:** there may be a disproportionate equality effect where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population;
- **Differential:** there may be a differential equality effect where people with a protected characteristic are affected differently from the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

The equality duty only applies to the protected characteristic of marriage and civil partnership in relation to employment discrimination. It is therefore considered unlikely that there would be effects from the Local Plan proposals for people on the basis of marriage and civil partnership. Therefore this characteristic has not been considered as part of the assessment.

The IIA also includes a consideration of the impact on different socio-economic groups. Whilst socio-economic status is not a characteristic protected by the Equality Act, it is best practice to consider this topic in an EqIA due to its close association with the protected characteristics. Socio-economic groups to be considered in the EqIA include those on low incomes, carers and those living in deprived areas.

The IIA Framework has integrated objectives relating to EqIA. Further information can be found in Section 2 Methodology. The findings of the EqIA part of the IIA are discussed in Section 9.

## **1.6 Health Impact Assessment**

A HIA is a means of assessing the potential health impacts of policies, plans and projects. The HIA process is designed to help decision-makers ensure that health and wellbeing is being properly considered in planning policies and proposals.

The NPPF states that 'Planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. (Para 96)'. In addition, the London Plan (2021) Policy GG3 Creating a Healthy City states 'To improve Londoners' health and reduce health inequalities, those involved in planning and development must assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of a Health Impact Assessments'. Further the London Plan (2021) states 'HIA is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.'

The HIA part of the IIA follows a qualitative approach and seeks to ensure that expert knowledge informs the process. The Council's Public Health team were involved in the preparation of the IIA Scoping Report.



The IIA Framework has integrated objectives relating to HIA. Further information can be found in Section 2 Methodology. The findings of the HIA part of the IIA are discussed in Section 10.

## 1.7 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected Habitat Sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

Habitats Regulations Assessment (HRA) can be integrated to a degree within the IIA with regards to setting out the baseline data and reflecting potential effects (a requirement of the SEA Directive (2001/42/EC), but the legal drivers and consultation requirements differ. Therefore, the scope of the HRA was included within the IIA Scoping Report, the results of HRA screening findings are reflected in this IIA Report.

An HRA screening exercise was undertaken as part of the Regulation 18 draft Local Plan to determine if the preferred options (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Habitat Site, in terms of its conservation objectives and qualifying interests. The findings of the HRA Report can be found summarised in Section 11 and in more detail within Appendix G.

## 1.8 How to Comment on this Document

This report is being consulted on with the statutory consultees<sup>1</sup> to confirm that it provides sufficient information to ensure that a robust and legally compliant IIA is carried out. Other interested parties are also being notified and the document will be also available on the London Borough of Harrow Council's website.

The consultation period will be six weeks from 4<sup>th</sup> November until 17<sup>th</sup> December 2024. Your views on this IIA Report are welcomed. A series of questions are set out below in order to guide responses but comments can be made about any aspect of the report.

The full set of Submission Version documents, supporting documents and further details on consultation arrangements (including online survey) can be found on the Council's website at: [New Local Plan Consultation – London Borough of Harrow](#).

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<sup>1</sup> Environment Agency, Historic England and Natural England.



**Questions to guide responses:**

- 1. Do you agree with the assessment methodology used?**
- 2. Do you agree that all of the reasonable alternatives have been identified?**
- 3. Do you agree that the potential significant effects identified in the assessment and the alternative options are correct?**
- 4. Do you agree with the proposed mitigation?**
- 5. Do you agree with the proposed monitoring?**
- 6. Do you have any other comments regarding the IIA including the integrated health and equalities assessments and the Habitats Regulations Assessment?**

**How to comment:**

**Please provide responses BY 17<sup>TH</sup> DECEMBER to Planning Policy Team via the email address below:**

[LOCALPLAN@HARROW.GOV.UK](mailto:LOCALPLAN@HARROW.GOV.UK)



## 2.0 Approach to the IIA

### 2.1 IIA Processes and Requirements

The IIA process is shown in Table 2-1. This IIA Report covers all stages of the IIA process.

Table 2-1: The IIA Process

Local Plan	The IIA Process
<b>Local Plan Stage 1: Pre-Production - Evidence Gathering</b>	<b>IIA Stages And Tasks</b>
	<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p><i>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</i></p> <p><i>A2: Collecting baseline information</i></p> <p><i>A3: Identifying sustainability issues and problems</i></p> <p><i>A4: Developing the IIA Assessment framework</i></p> <p><i>A5: Consulting on the scope of the IIA</i></p>
<b>Local Plan Stage 2: Production</b>	<b>IIA Stages and Tasks</b>
	<p>Stage B: Developing and refining options and assessing effects</p> <p><i>B1: Testing the plan objectives against the IIA assessment framework</i></p> <p><i>B2: Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)</i></p> <p><i>B3: Predicting the effects of the plan and its alternatives</i></p> <p><i>B4: Evaluating the effects of the plan and its alternatives</i></p> <p><i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</i></p> <p><i>B6: Proposing measures to monitor significant effects of implementing local plans</i></p>
	<p>Stage C: The formal IIA Report</p> <p><i>C1: Preparing the formal IIA Report</i></p>
	<p>Stage D: Consulting on the preferred options of the Local Plan and IIA Report</p> <p><i>D1: Public participation on the preferred options of the Local Plan and the IIA Report</i></p> <p><i>D2(i): Appraising significant changes</i></p>
<b>Local Plan Stage 3: Examination</b>	<b>IIA Stages and Tasks</b>
	<i>D2 (ii): Appraising significant changes resulting from representations</i>
<b>Local Plan Stage 4:</b>	<b>IIA Stages and Tasks</b>
	D3: Making decisions and providing information



Local Plan	The IIA Process
Adoption and monitoring	<i>D3: Preparing the Adoption Statement</i>
	Stage E: Monitoring the significant effects of implementing the Local Plan
	<i>E1: Finalising aims and methods for monitoring within the final Adoption Statement</i>
	<i>E2: Responding to adverse effects</i>

## 2.2 Stage A: Scoping

The purpose of the Scoping stage is to identify existing and future environmental, social, economic, health, equality issues facing Harrow, based on analysis of baseline data and other relevant Policies, Plans and Programmes (PPP).

Stage A, Scoping, was completed in December 2023 following consultation with statutory consultees and other key stakeholders on a Scoping Report between 5<sup>th</sup> October 2023 and 9<sup>th</sup> November 2023.

It involved the preparation of a IIA Scoping Report for consultation with statutory consultees<sup>2</sup> and selected stakeholders in accordance with legal requirements. Within the Scoping Report, a set of IIA objectives were proposed within a framework which covered the IIA issues identified for the Borough.

The SEA Regulations set out topics which must be considered in an SEA and Table 2-2 demonstrates where these are covered by the IIA topics. These topics are also set out in the IIA Framework in Table 2-3.

**Table 2-2: Coverage of the SEA Topics**

IIA Topics	SEA Regulations requirements
Economy & Employment	Not required
Population & Equalities	Population
Health	Human Health
Housing	Material Assets
Transport & Accessibility	Material Assets
Air, Noise & Light	Air
Climatic Factors	Climatic Factors
Biodiversity, Geodiversity, Flora & Fauna	Biodiversity, flora and fauna
Cultural Heritage	Cultural heritage, including architectural and archaeological factors
Landscape	Landscape
Soils, Water & Minerals	Water Soil
Waste	Not required

The Scoping Report was consulted on between 5<sup>th</sup> October to 9<sup>th</sup> November 2023 (a period of 5 weeks). The Scoping Report presented baseline information on the

<sup>2</sup> As a minimum this needs to include the statutory consultees which are Natural England, Historic England, and the Environment Agency





environmental, social and economic characteristics of the plan area (including health, equalities and Habitats Sites), including the likely evolution of the baseline within the plan period.

The Scoping Report set out the IIA Framework of objectives which was developed using the issues identified in the baseline data and the review of PPP. The IIA Framework of objectives has been used to assess the Local Plan policies, including proposed locations for new development and any reasonable alternatives.

Responses to the IIA Scoping Report were received from the Environment Agency, Historic England, Natural England, Harrow Nature Conservation Forum and Harrow Wildlife Action, NHS North East London/NHS London Health Urban Development unit, and the London Borough of Harrow Council Departments for Culture and Leisure, Transport, Education, Planning, Equalities and the Commercial Safety Team. The consultee comments suggested changes to the IIA Framework, changes to the baseline data, additional data and additional documents of relevance to the IIA. The review of other relevant Policies, Plans and Programmes (PPP) and baseline data have been updated in response to the comments between December 2023 and February 2024 and are included within this IIA Report (in Appendices A and B respectively). Summarised information is also included within Sections 4 and 5 of this report.

The final version of the IIA Framework is shown in Table 2-3. This version has been updated following consultation on the Scoping Report and on the Regulation 18 IIA Report, taking into account responses received. Key changes following Regulation 18 consultation were suggested by Historic England and included amends to the objective and sub-objective wording of IIA11 (Cultural Heritage).

The IIA Framework contains IIA objectives and assessment questions. The assessment questions have been used to help guide the assessment of the Local Plan, including proposed locations for new development and any reasonable alternatives. However, it should be noted that the assessment questions were not applicable in all circumstances (i.e. some questions were applicable to policies, some were solely applicable to proposed locations for new development). Baseline data evidence has also been referred to when using the IIA Framework to assess the Local Plan and its alternatives.

The structure of the IIA Framework has been drawn from the consultants' experience of developing assessment frameworks. The IIA objectives and assessment questions have been developed to address the key messages from the PPP review and the sustainability issues.

The IIA framework needs to ensure that the EqIA and HIA are adequately addressed, by including objectives and assessment questions relevant to each assessment. In order to demonstrate this, Table 2-4 identifies the priority IIA objectives for each of the assessments integrated into the IIA.



**Table 2-3: IIA Framework**

IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Economy and Employment	<b>IIA1 Economy:</b> <b>To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses</b>	<ul style="list-style-type: none"> <li>• support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?</li> <li>• support the provision of world class infrastructure and connectivity?</li> <li>• support flexible working practices?</li> <li>• protect and retain an adequate supply of employment floor space to address business needs?</li> <li>• enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?</li> <li>• safeguard existing town centres?</li> <li>• maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?</li> <li>• improve existing shopping facilities within town centres and neighbourhood parades?</li> <li>• support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?</li> <li>• support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?</li> </ul>
	<b>IIA2 Employment:</b> <b>To create greater employment opportunities and higher value jobs for all ages across the whole borough</b>	<ul style="list-style-type: none"> <li>• create new jobs in high value sectors, including in the green sector?</li> <li>• encourage developers to demonstrate how they are investing in skills and employing local people?</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Population and Equalities	<b>IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)</b>	<ul style="list-style-type: none"> <li>• ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including:               <ul style="list-style-type: none"> <li>• education facilities?</li> <li>• recreation facilities?</li> <li>• health services?</li> </ul> </li> <li>• increase the delivery of new or enhanced community and health facilities?</li> <li>• help ensure all children have access to a local school within reasonable walking distance?</li> <li>• increase education facility provision for children with learning disabilities?</li> <li>• ensure local facilities have capacity to accommodate proposed development?</li> <li>• ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity?</li> <li>• avoid an adverse/ discriminatory impact on protected characteristics/equality groups?</li> <li>• ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled, elderly, families with children?</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Health	<b>IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life</b>	<ul style="list-style-type: none"> <li>• use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?</li> <li>• ensure everyone has access to places to mix and meet such as community facilities (e.g. community halls and places of worship) and recreation facilities?</li> <li>• increase and improve opportunities for active travel including walking and cycling?</li> <li>• increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?</li> <li>• ensure everyone has access to open space to help promote healthy lifestyles and wellbeing?</li> <li>• increase provision of private amenity space?</li> <li>• encourage the protection of allotments and encourage the delivery of new spaces to grow food?</li> <li>• ensure all representative groups will be consulted and engaged with?</li> </ul>
Housing	<b>IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups</b>	<ul style="list-style-type: none"> <li>• increase the number of additional homes delivered to meet local needs/targets?</li> <li>• increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?</li> <li>• provide affordable homes of the tenure and size to meet the identified needs?</li> <li>• increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?</li> <li>• increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
		<p>of users/occupants; such as those with disabilities, wheel chair users and families with children?</p> <ul style="list-style-type: none"> <li>provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?</li> </ul>
Transport and Accessibility	<p><b>IIA6 Sustainable Travel:</b> <b>To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.</b></p>	<ul style="list-style-type: none"> <li>ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?</li> <li>encourage intensification in existing residential areas in the most accessible locations within the borough?</li> <li>improve existing cycling and walking network and provide new routes?</li> <li>increase and improve opportunities to access public transport including where there are existing issues (such as steps)?</li> <li>reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?</li> </ul>
Air, Noise & Light	<p><b>IIA7 Air, Light and Noise Pollution:</b> <b>To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions</b></p>	<ul style="list-style-type: none"> <li>ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?</li> <li>avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?</li> </ul>
Climatic Factors	<p><b>IIA8 Minimising Contributions to Climate Change:</b> <b>To reduce the borough's contribution towards the emission of climate change gases</b></p>	<ul style="list-style-type: none"> <li>support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)?</li> <li>support the shift towards usage of electric and ultralow emissions vehicles?</li> <li>promote a low carbon local economy?</li> <li>ensure new developments are energy efficient?</li> <li>minimise greenhouse gas emissions?</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
	<p><b>IIA9 Adaptation to Climate Change:</b>  <b>Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</b></p>	<ul style="list-style-type: none"> <li>• minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?</li> <li>• ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?</li> <li>• encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?</li> </ul>
<p>Biodiversity, Geodiversity, Flora &amp; Fauna</p>	<p><b>IIA10 Biodiversity:</b>  <b>To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats</b></p>	<ul style="list-style-type: none"> <li>• avoid adverse effects on European designated habitats sites?</li> <li>• conserve, enhance and repair nationally and locally designated wildlife sites?</li> <li>• conserve, enhance and repair natural and semi natural habitats?</li> <li>• contribute to the delivery of new or safeguard existing BAP priority species and habitats?</li> <li>• achieve biodiversity net gain (BNG) in new developments?</li> <li>• provide new or improved access to greenspaces?</li> <li>• contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?</li> <li>• protect sites of geological importance?</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Cultural Heritage	<b>IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	<ul style="list-style-type: none"> <li>• conserve and/or enhance heritage assets, historic environment, and their settings?</li> <li>• maintain and enhance access to cultural heritage assets?</li> <li>• ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?</li> <li>• contribute to the better management of heritage assets and contribute to conserving heritage at risk?</li> <li>• improve the condition of the historic environment?</li> <li>• encourage heritage-led regeneration?</li> <li>• help provide solutions to those assets on the Heritage at Risk register?</li> </ul>
Landscape and Townscape	<b>IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character</b>	<ul style="list-style-type: none"> <li>• respect, maintain and strengthen local landscape and townscape character and distinctiveness?</li> <li>• promote high quality and contextually successful design?</li> <li>• avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?</li> <li>• protect sensitive areas and protected views?</li> <li>• safeguard landscape and townscape features such as trees?</li> </ul>



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Soils, Water & Minerals	<b>IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</b>	<ul style="list-style-type: none"> <li>• seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?</li> <li>• avoid development of greenfield land?</li> <li>• promote the efficient use of minerals?</li> <li>• protect soil quality and avoid soil pollution?</li> <li>• ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?</li> <li>• protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?</li> <li>• Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?</li> </ul>
Waste	<b>IIA14 Waste: To minimise waste</b>	<ul style="list-style-type: none"> <li>• encourage new developments to provide adequate space for waste separation?</li> <li>• encourage the repurposing and refurbishing of buildings, instead of demolition?</li> <li>• ensure waste is dealt with in line with circular economy principles?</li> <li>• safeguard existing waste management sites?</li> </ul>





**Table 2-4: Priority IIA Objective for each Constituent Assessment**

<b>IIA Objective</b>	<b>EqIA</b>	<b>HIA</b>	<b>HRA</b>	<b>SEA</b>	<b>SA</b>
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Y				Y
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Y	Y			Y
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities and recreational resources (including open spaces and sports facilities)	Y	Y		Y	Y
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Y	Y		Y	Y
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups	Y	Y		Y	Y
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage	Y	Y		Y	Y
IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Y	Y		Y	Y
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases		Y		Y	Y
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability		Y		Y	Y
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats			Y	Y	Y
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings				Y	Y
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character				Y	Y
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources		Y		Y	Y
IIA14 Waste: To minimise waste					Y



## 2.3 Stage B: Alternative Options Assessment

During Stage B, a number of reasonable alternatives to the preferred policies were subject to assessment alongside the preferred policies, in order to identify the most sustainable option to be taken forward. Forty-one site allocation options have also been assessed. The assessments identify whether the preferred policies/site options require any mitigation or enhancement, to offset potential negative or uncertain effects and to promote sustainable development.

The significance criteria set out in **Error! Reference source not found.** was used to determine the potential sustainable performance of the policies and site options.

**Table 2-5: Significant Definitions**

Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
++	<p><b>Significant Positive Effect:</b> the option or policy supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre</p>	<p>Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to:</p> <ul style="list-style-type: none"> <li>• enhance and redefine a location in a positive manner, making a contribution at a national or international scale;</li> <li>• repair or restore receptors badly damaged or degraded through previous uses; and/or</li> <li>• improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific regional or national designation.</li> </ul>
+	<p><b>Minor Positive Effect:</b> the option or policy supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect</p>	<p>Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could:</p> <ul style="list-style-type: none"> <li>• improve undesignated yet recognised receptor qualities at the neighbourhood scale;</li> <li>• fit into or with the existing location and existing receptor qualities;</li> <li>• affect a localised receptor; and/or</li> <li>• enable the restoration of valued characteristic features partially lost through other land uses.</li> </ul>
0	<p><b>Neutral Effect:</b> the option or policy has</p>	N/A



Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
	no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	<b>Minor Negative Effect:</b> the option of policy appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could: <ul style="list-style-type: none"> <li>• be out of scale with the location;</li> <li>• affect a localised receptor; and/or</li> <li>• leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.</li> </ul>
--	<b>Significant Negative Effect:</b> the option or policy works against the achievement of this objective; it does not address relevant assessment questions; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be: <ul style="list-style-type: none"> <li>• to permanently degrade, diminish or destroy the integrity of the receptor;</li> <li>• to cause a very high-quality receptor to be permanently changed and its quality diminished;</li> <li>• not fully mitigable and may cumulatively amount to a severe adverse effect;</li> <li>• at a considerable variance to the location, degrading the integrity of the receptor; and/or</li> <li>• substantially damaging to a high-quality receptor such as a specific regional or national designation.</li> </ul>



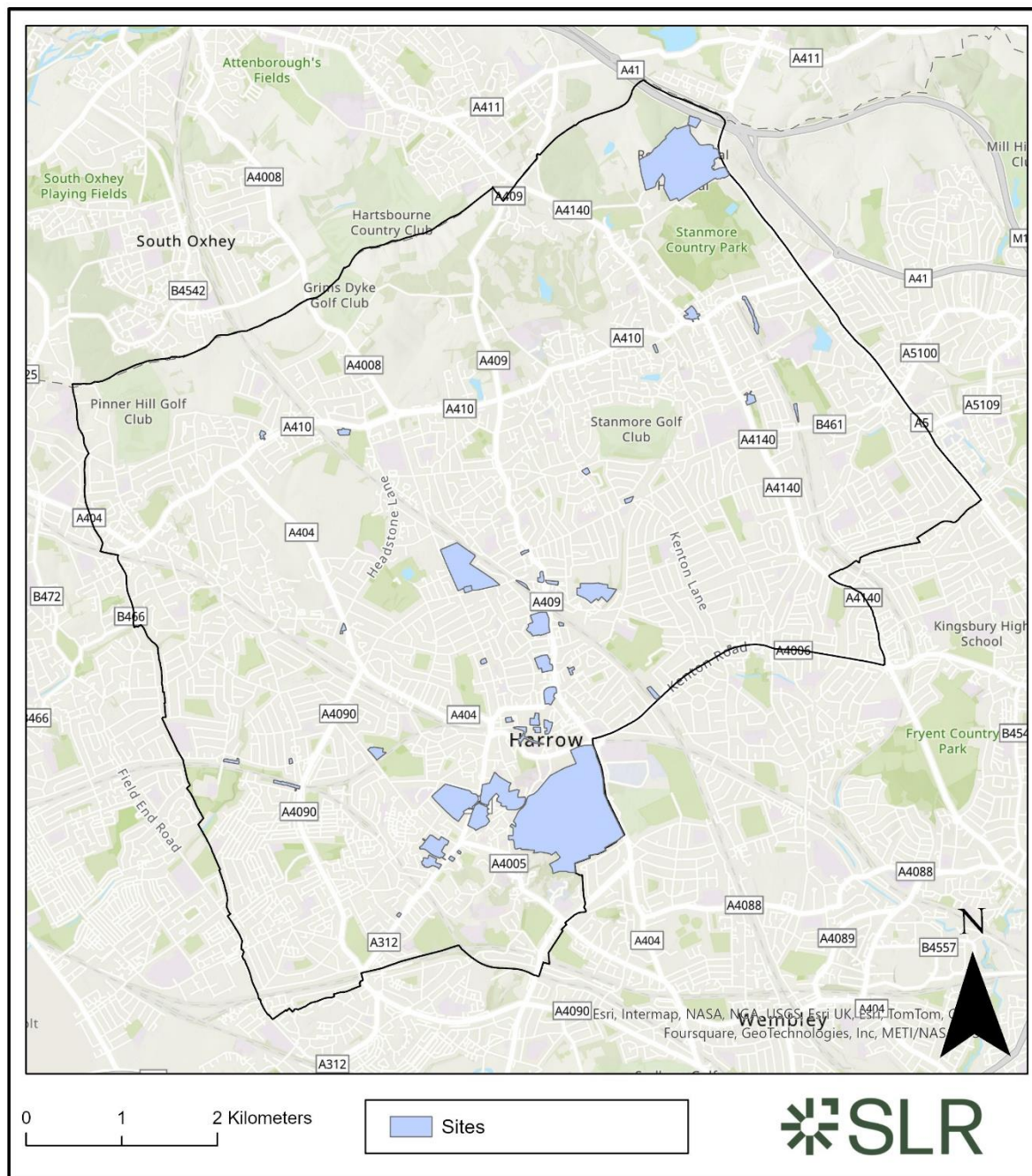
Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
	ecological site of national importance.	

A version of the Local Plan Regulation 18 preferred policies was provided to the consultants dated December 2023. The tall buildings and protected views policies and alternatives were provided in January 2024. The alternatives were assessed to the same level of detail as the preferred policies and reference has been made to the baseline data and key sustainability issues in the Borough identified during the Scoping stage. The performance of the alternatives is presented within Appendix C and discussed within Section 6 of this report.

The site allocation options assessed were all considered to be available, deliverable and suitable for development by LBHC. An initial batch of the Local Plan Regulation 19 site allocation options was provided to consultants in July 2024. The remaining batch of site allocation options was provided to consultants in August 2024. Details of how these site options were identified is provided in Section 6.12.

The location of sites are presented in Figure 2-1.





**Figure 2-1: Location of Sites included in the IIA**

For the assessment of site allocation options, spatial data within a Geographical Information System (GIS) was used to inform the assessment of each proposed site allocation. A GIS layer was provided by LBHC detailing the location, size, and shape of each potential site. Information regarding the most up-to-date potential housing yield, site size and overall use of the site was also provided to consultants in September 2024 through site proformas.

Where GIS was identified as appropriate for an IIA Objective, a RAG (Red, Amber, Green) rating was applied to each indicator. This was determined through the application of a set of RAG criteria which are set out in Table 2-6 below. These criteria were generated through reference to existing guidance / good practice; the sources of this guidance and good practice are also included within Table 2-6. Some



criteria were identified using professional judgement and where this is the case, it is indicated within Table 2-6. The RAG ratings informed the assessment of all site options.



**Table 2-6: RAG Criteria**

IIA Objective	Indicator	RAG criteria	Justification
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Provision of employment space	Provides additional or enhanced employment floor space and safeguards existing stock Site provides mixed use employment and other uses with no net loss of existing floor space on the edges of existing employment areas or loss of employment floor space outside of designated employment areas Site results in the loss of employment floor space within the existing designated employment areas	Professional judgement
	Retail and town centre uses	Provides additional/ enhanced retail/ town centre uses (including via mixed use) within the town centre boundaries Provides additional/enhanced retail/town centre uses, (including via mixed use) within the edge boundary (i.e. 300m) of the town centres. For office uses this includes sites that are within 500m within public transport interchange Results in the loss of retail/town centre uses within town centres or is proposing such uses within an out of town centre location (i.e. beyond 300m of edge of TC boundary for retail/TC uses or offices beyond 500m of public transport interchange)	Professional judgement
	Proximity to town centre	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
IIA2 Employment:	Proximity to existing employment areas	<400m 400-800m	CIHT Planning for Walking Guidelines, 2015



IIA Objective	Indicator	RAG criteria	Justification
To create greater employment opportunities and higher value jobs for all ages across the whole borough		>800m	
	IMD Income deprivation and employment deprivation	High income/employment deprivation Medium income/employment deprivation Low income/employment deprivation	Professional judgement
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	PTAL score	5-6 3-4 0-2	TfL, Assessing Transport Connectivity in London, 2015 <sup>8</sup>
	Proximity to GP surgeries	<800m 800-1200m >1200m	CIHT Planning for Walking Guidelines, 2015
	Distance from formal recreation e.g. sport centre, play parks	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
	Distance to informal recreation space e.g. open space	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
	Distance to primary school	<800m <800-1200m >1200m	Home to School Transport and Travel Guidance, 2014 <sup>3</sup>
	Distance to secondary school	<1km <4.8km >4.8km	Home to School Transport and Travel Guidance, 2014

<sup>3</sup> Department for Education, Home to School Travel and Transport Guidance, Statutory Guidance for Local Authorities, July 2014





IIA Objective	Indicator	RAG criteria	Justification
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Distance from formal recreation e.g. sport centre, play parks	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
	Distance to informal recreation space e.g. open space	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
	Distance from community centre or place of worship	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015
	Proximity to existing cycle routes	<400m 400-800m >800m	Professional judgement
	Allotment	Not an existing allotment Existing allotment	
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the	Expected yield	>100 units 1-100 units <Loss of units	Professional judgement
	Affordable housing	>50% affordable housing Circa 35% affordable housing provision No affordable housing provision	In line with London Plan (2021)



IIA Objective	Indicator	RAG criteria	Justification
needs of all residents including the elderly, families with children and other vulnerable groups			
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Proximity to existing and new employment sites	<400m 400-800m >800m	CIHT Planning for Walking Guidelines, 2015 / professional judgement
	Proximity to GP surgeries	<800m 800-1200m >1200m	CIHT Planning for Walking Guidelines, 2015 / professional judgement
	PTAL score	5-6 3-4 0-2	TfL, Assessing Transport Connectivity in London, 2015 <sup>8</sup>
	Proximity to train/ tube station	<800m 800-1000m >1000m	CIHT Planning for Walking Guidelines, 2015
	Proximity to bus stop	<400m >400m	CIHT Planning for Walking Guidelines, 2015
	Distance to primary school	<800m <800-1200m >1200m	Home to School Transport and Travel Guidance, 2014 <sup>4</sup>
	Distance to secondary school	<1km <4.8km >4.8km	Home to School Transport and Travel Guidance, 2014

<sup>4</sup> Department for Education, Home to School Travel and Transport Guidance, Statutory Guidance for Local Authorities, July 2014



IIA Objective	Indicator	RAG criteria	Justification
	Proximity to existing cycle routes	<400m 400-800m >800m	Professional judgement
<p>IIA7 Air, Light and Noise Pollution:</p> <p>To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions</p>	AQFA	Outside AQFA Within AQFA	Professional judgement
	Sustainable Locations	Site is located within the Opportunity Area, major, metropolitan and district Town centres Site is located within 800m of the boundary of the Opportunity Area, a metropolitan, major, or district town centres Site is located beyond the above locations	Professional judgement
	Noise pollution	Site not affected by existing noise pollution Site affected by existing noise pollution	Professional judgement & Extrium – England Noise Map Viewer
	Night blight map	8->32 Nanowatts 1-7 Nanowatts <0.25-0.99 Nanowatts	Professional judgement & CPRE Light Pollution Map
<p>IIA8 Minimising Contributions to Climate Change:</p> <p>To reduce the borough's contribution towards the emission of climate change gases</p>	Distance to EV charging points	Within 200m of the site Within 600m of public one More than 600m from an EV charging points	Professional judgement



IIA Objective	Indicator	RAG criteria	Justification
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Flood risk	Zone 1 Zone 2 Zone 3	Environment Agency Guidance <sup>5</sup>
	Proximity to watercourse	>1000m 10-1000m <10m	Cirra Environmental Good Practice on Site (Third Edition), 2010
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	SSSI proximity	>800m 400-800m <400m	RTPI Strategic Env. Assessment Practice Advice 2018. It is recognised that distance is not a definitive guide to the likelihood or significance of effects on a SSSI.
	Within SSSI impact risk zone	No residential limits/under residential limit Within 10 dwellings of residential limits Exceeds residential limits	Natural England's Impact Risk zones for Sites of Special Scientific Interest <sup>6</sup>
	SINC	>200m from SINC <200m from SINC Site intersects SINC	NPPF
	Tree Preservation Orders	No TPOs on site TPO within 10m of the site TPO included within site	NPPF

<sup>5</sup> Environment Agency, Flood Risk Assessment: Local Planning Authorities Guidance

<sup>6</sup> [https://magic.defra.gov.uk/Metadata\\_for\\_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf](https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf)



IIA Objective	Indicator	RAG criteria	Justification
	RIGS	>50m <50m Intersects or is adjacent	Professional Judgement
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites)	Scheduled Monuments & Buffer	>25m <25m <10m	RTPI Practice Advice, 2018
	Conservation Areas	>50m <50m Intersects or is adjacent	It is appropriate to 'flag' a site red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a conservation area and a 50m threshold has been assumed. It is recognised that distance is not a definitive guide to the likelihood or significance of effects in a heritage asset.
	Listed Buildings		
	Locally Listed Buildings		
	Archaeological priority Areas	Not within Archaeological Priority Area Partly within Archaeological Priority Area Within Archaeological Priority Area	Historic England <sup>7</sup>
Registered parks and gardens	>25m <25m	RTPI Practice Advice, 2019	

<sup>7</sup> Greater London Archaeological Priority Areas <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>



IIA Objective	Indicator	RAG criteria	Justification
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Green Belt	<10m Not within Green Belt Partly within or adjacent to Green Belt Within Green Belt	Existing Local Plan
	Metropolitan Open Land	Not within Metropolitan Open Land Partly within Metropolitan Open Land Within Metropolitan Open Land	London Plan
	Protected Views	Not within Protected View Zone Partly within Protected View Zone Within Protected View Zone	Existing Local Plan
	Areas of Special Character	Not within Area of Special Character Partly within or adjacent to Area of Special Character Within Area of Special Character	Existing Local Plan
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Brownfield land	Yes Partial No	RTPI Practice advice, 2017
	Historic landfill buffer	No Within 10m Yes	Professional judgement
	Agricultural Land Classifications	Grades 1 & 2 Grades 3 & 4 Grade 5, non-agricultural land, and urban land	Natural England: Guide to assessing development



IIA Objective	Indicator	RAG criteria	Justification
			proposals on agricultural land <sup>8</sup>
	Groundwater source protection zone	Not within a protection zone Zones 2&3 Zone 1	Environment Agency <sup>9</sup>
	Proximity to water courses	>1000m 10-1000m <10m	Cirra Environmental Good Practice on Site (Third Edition), 2010
IIA14 Waste: To minimise waste	Waste management sites	Not a safeguarded waste management site Within 100m of an existing waste management site Safeguarded waste management site or existing waste management site	Professional judgement

<sup>8</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>9</sup> <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged>



## **2.4 Stage C: Policies Assessment and Producing the IIA Report**

Stage C of an IIA involves identifying the significant environmental effects of the Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and documenting the IIA process and findings within a formal IIA Report (this report) and an accompanying Non-Technical Summary (NTS). These documents set out the IIA findings of the Pre-Submission Local Plan policies and sites as well as the reasonable alternatives considered.

## **2.5 Stage D: Consultation**

Stage D of the IIA process is the current consultation period, during which statutory and public consultees are invited to comment on the draft plan and this accompanying IIA Report. For further details of how to respond, please see Section 1.4.

Following Stage D (consultation), comments received on the Pre-Submission Local Plan and IIA will be considered and updates made where appropriate to form the Submission Local Plan and IIA.

## **2.6 Assumptions and Limitations**

The SEA Regulations require the IIA Report to include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic area in Section 5 of this report (Summary of Baseline Data).

Polices and sites have been assessed by a number of assessors simultaneously. The assessment was undertaken on the understanding that the preferred policies are to be read in conjunction with the other preferred policies within the draft Local Plan and were not assessed in isolation.

The assessment of policies and sites, including spatial policies, has been undertaken as a desk-based exercise using the baseline information presented in Appendix B and using published GIS data. No site visits have been undertaken specifically for the purposes of the IIA.

Every effort has been made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the plan will be implemented and limited by understanding of the baseline. Given uncertainties, there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the assessment text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict potential 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan and alternatives in more general terms.

Some assumptions and limitations are noted within the assessments of the policies and alternatives, the full details of which can be found within Appendix D. For example, the appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain.





If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the assessment may alter.

## 2.7 How the requirements of the SEA Regulations have been met

Table 2-7 outlines where elements of the SEA Regulations are addressed within the report.

**Table 2-7: Fulfilling the Requirement of the SEA Regulations**

What the regulations say <sup>10</sup>	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document and in Appendix A.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document and in Appendix B.
The environmental characteristics of areas likely to be significantly affected.	Section 3.3 of this document outlines the characteristics of the plan area in general and Section 5 outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed by information contained within the IIA baseline data Appendix B.
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document provides a summary of baseline data and outlines key sustainability issues related to each IIA topic. Sites designated pursuant to Directives 79/409/EEC and 92/43/EEC which could be affected by the Harrow Local Plan are identified within Section 11 and Appendix G in relation to the Habitats Regulations Assessment (HRA).
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The environmental objectives have been taken into account through integrating within the IIA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above	Sections 7 and 8 set out the significant effects of the draft Local Plan and Section 6 discusses the significant effects of reasonable alternatives.  Details of the nature of effects are provided within Appendices D, E and F. This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long

<sup>10</sup> Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.



What the regulations say <sup>10</sup>	How this is addressed
effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	term), permanent or temporary and negative or positive effects. Definitions are provided within Table 2.5 in Section 2.4.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 13 sets out mitigation measures for significant negative (negative) effects and uncertain effects.
An outline of the reasons for selecting the alternatives dealt with	Section 6 provides a summary of the relative performance of the reasonable alternatives identified and assessed as well as the information provided within Appendix C about the alternatives to the preferred policies.
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 outlines the methodology for all stages of the IIA and Section 2.5 specifically describes any technical difficulties that were encountered.  Section 5 outlines data gaps.
A description of measures envisaged concerning monitoring.	Discussed in Section 14 of this document.
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole IIA Report addresses this.
Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	The Scoping Report was consulted on with statutory consultees, key stakeholders <sup>11</sup> , and adjoining boroughs for a five week period from 5 <sup>th</sup> October to 9 <sup>th</sup> November 2023
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	This IIA report will be consulted for six weeks between 4 <sup>th</sup> November to 17 <sup>th</sup> December 2024 and will be amended following consultation where appropriate.

<sup>11</sup> Including the Environment Agency, Natural England, Historic England which are the SEA statutory consultees.



What the regulations say <sup>10</sup>	How this is addressed
<p>Identify where the implementation of the plan or programme is likely to have significant effects on the environment of a Member State.</p>	<p>Section 7 presents the potential significant effects of the draft Local Plan. The assessment has not identified any potential effects on member states.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8). Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: The plan or programme as adopted. A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with. The measures decided concerning monitoring.</p>	<p>This will be set out in the IIA Adoption Statement.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>Proposed monitoring arrangements are discussed in Section 13.</p>



### 3.0 The Content of the Harrow Local Plan

#### 3.1 Overview of the Plan Area

Harrow is a Borough in outer London, situated 10 miles to the north-west of central London. The Borough has a land area of approximately 5,047 hectares, making it the 12th largest Borough (by area) in London. To the South, Harrow is neighboured by additional London Boroughs - Brent, Barnet, Ealing and Hillingdon. To the North, Harrow is neighboured by Hertsmere Borough Council and Three Rivers District Council. Figure 3-1 below presents Harrow's location.

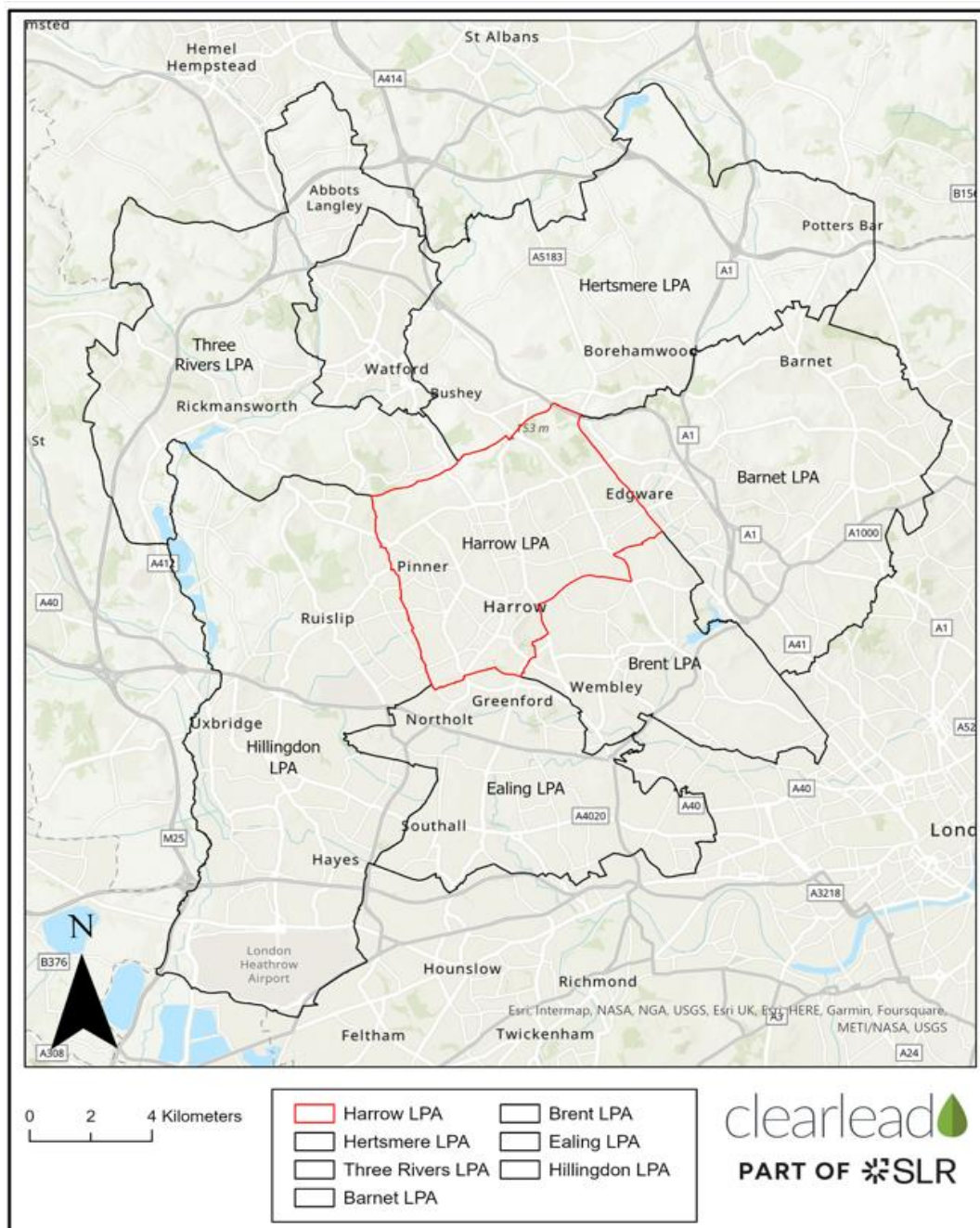


Figure 3-1: Harrow, and its surrounding Local Planning Authorities



Harrow town centre is one of twelve metropolitan centres in London; it has not experienced the same level of urban growth as neighbouring metropolitan centres. Other key urban areas within the Borough include Stanmore, Wealdstone, North Harrow, Rayners Lane, Pinner, and South Harrow, as well as Edgware Town Centre and Burnt Oak District Centre (both constitutes of Barnet Borough with crossover into Harrow Borough) and Kingsbury and Kenton (both constitutes of Brent Borough with crossover into Harrow Borough).

Harrow has experienced a growing population since 2011, and currently has a population of 261,300. This is expected to increase by 2041, with the percentage of residents aged over 65 expected to heighten, showcasing an ageing population<sup>12</sup>.

### 3.2 Description of the Plan

The SEA Regulations require information on:

*“An outline of the contents and main objectives of the plan or programme.”* (Schedule 2, Paragraph 1).

The Borough wide Local Plan will replace the previous Development Plan Documents, which comprise of the Harrow Core Strategy (adopted 2012), Development Management Policies Plan (adopted 2013), Site Allocations Plan (adopted 2013) and the Harrow and Wealdstone Area Action Plan (adopted in 2013). The Harrow Local Plan has been prepared and drafted with the previous Core Strategy<sup>13</sup> and other Development Plan documents in mind, as well as the previous Sustainability Appraisal<sup>14</sup>, Habitats Regulation Assessment<sup>15</sup>, and Inspector’s Report<sup>16</sup>. The Harrow Local Plan covers the period of 2021-2041. It sets out an overall vision, key objectives and a spatial strategy for the Borough and includes strategic policies accompanied by a range of detailed policies and proposals to support this.

One of the key requirements for producing a new Local Plan has been to identify sufficient land for housing, economic development and other uses to meet the identified needs of the Borough, whilst at the same time ensuring that such land can be readily brought forward for development, including to enable LBHC to demonstrate a five-year supply of deliverable housing sites. Provision for future housing and employment growth has been made in conformity with the London Plan (2021). In addition the plan includes policies to determine applications for development proposals (and change of uses) to ensure; new/enhanced infrastructure (i.e. healthcare facilities, schools, community facilities) is delivered; deliver affordable housing, encourage good design; protect and enhance the natural (i.e. Green belt, MOL), built, and historic environment, as well as address the causes and impacts of climate change, in order to promote the sustainable development.

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<sup>12</sup> [Census change over time data, England and Wales - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 02/08/23)

<sup>13</sup> Harrow Core Strategy 2012 [local-plan-core-strategy.pdf \(harrow.gov.uk\)](#) (Accessed 14/07/23)

<sup>14</sup> Harrow Sustainability Appraisal 2012 [Sustainability Appraisal of Submission Development Management, Site Allocations and Area Action Plan DPDs \(harrow.gov.uk\)](#) (Accessed 14/07/23)

<sup>15</sup> Harrow Habitats Regulation Assessment 2012 [Harrow Council](#) (Accessed 14/07/23)

<sup>16</sup> Harrow Local Plan Inspectors Report 2012 [local-plan-site-allocation-inspectors-report.pdf \(harrow.gov.uk\)](#) (Accessed 14/07/23)



As set out in The London Plan (2021), Harrow Borough is expected to deliver a minimum of 8,020 homes in the period 2019-2029. 3,750 of these are to be delivered on small sites (below 0.25 hectares in size)<sup>17</sup>. LBHC have undertaken a Local Housing Needs Assessment and are proposing to roll forward the London Plan 10 year housing delivery (8020) and include a housing requirement/target 16,040 within the Local Plan, during the Plan period (2021-41).

The Council has undertaken a call for sites consultation. In line with national planning policies, an objective assessment of the suitability, availability and achievability of all the submitted sites and the existing unimplemented site allocations has been undertaken, to determine which sites should be considered for potential allocation through the Local Plan process. This work has also supported by design led housing capacity work, a Local Plan Viability Assessment and other evidence. This indicates that the Borough may have sufficient capacity to fully meet the proposed housing requirement of delivering 16,040 to address local needs, during the Plan period.. The site selection process carried out by LBHC is described in detail in Section 6.3.

Housing needs are expected to be met through new and infill developments, redevelopment of previously developed sites and redundant buildings, conversions, change of uses and extensions to existing buildings. In line with the London Plan (2021), this is primarily expected to take place within the Harrow and Wealdstone Opportunity Area, the redevelopment and mixed use development of sites within the existing Town Centres, as well as the incremental intensification of small sites within existing residential areas that have good access to local services, facilities and public transport. Employment needs are expected to be met through the intensification and redevelopment of existing employment sites; as there is limited scope to provide additional employment floor space due to the tight urban boundary and housing pressure. LBHC anticipate that the prioritisation of previously developed sites will have sufficient capacity to fully meet the future development needs of the area within the existing built-up area of the Borough. Therefore, there is no evidence to justify any release of any greenfield sites or Greenfield sites within Green Belt or Metropolitan Open Land to meet any residual development needs.

London Borough of Harrow Council, along with neighbouring London Authorities, have agreed to meet the London Plan housing requirement in full. Hertfordshire authorities to the north are requesting London Boroughs to meet their unmet needs but they still have to demonstrate they have explored all options to fully accommodate their needs within their administrative boundaries. At present there are no neighbourhood plans being progressed in Harrow.

### **3.3 Plan Vision and Objectives**

The draft Local Plan contains strategic objectives which are reproduced in Table 3-1.

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<sup>17</sup> The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 14/07/23)



**Table 3-1: Harrow Local Plan Strategic Objectives**

<b>Harrow Local Plan Strategic Objectives</b>	
<b>Our Local Identity</b>	Retain, reinvigorate and reinforce the local distinctive character of Harrow's communities by ensuring new development responds positively to the special attributes of its local context. Respecting the cultural, historic, built and natural environments and the need for their integrated management. Ensuring new development is designed, constructed and maintained to a high standard. Conserve and enhance the historic and cultural environment, promoting understanding and appreciation of it. Working with stakeholders to sustain the value of local heritage assets including the international value of Harrow School.
<b>Infrastructure</b>	Harrow's infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of social and physical infrastructure, including education, health care, recreation and cultural facilities.
<b>Transport</b>	Sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to private vehicles. The council will facilitate modal shift away from fossil fuel car use.
<b>Air quality</b>	Air quality improvements will continue to be made through high quality design, spatial planning and sustainable infrastructure improvements.
<b>Open Space</b>	The quality of existing open space will be improved, and new open space provision will be facilitated. Public access to open space will be increased.
<b>Biodiversity</b>	The borough's biodiversity will be protected and enhanced, with greenbelt and MOL land becoming a thriving example of biodiversity uplift.
<b>Climate Emergency</b>	Harrow will reduce its contribution to climate change through facilitating net zero development where possible, minimising our reliance on fossil fuels, promoting retrofitting and energy efficiency, and utilising sustainable design methods and reducing flood risk. Harrow will improve its resilience to climate change through mitigation and adaptation.
<b>Waste and Recycling</b>	Harrow will continue to minimise waste and increase recycling rates in line with circular economy principles.
<b>Housing</b>	Harrow will facilitate the delivery of new housing from a range of sources to meet the diverse range of housing needs of a growing population and demographic changes. This will be located within the most sustainable locations of the Borough such as the opportunity area, town centres and sustainable locations to protect, enhance and positively evolve the character of the suburbs.
<b>Affordable Housing</b>	Maximise delivery of genuinely affordable housing to meet the needs of residents.
<b>Mixed and Inclusive Communities</b>	Promote inclusive, mixed sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy communities enabling the older population to remain independent and active for longer, as well as providing specialised housing options to meet the needs of vulnerable residents.



<b>Harrow Local Plan Strategic Objectives</b>	
<b>Housing Types</b>	Promote a range of well-designed and accessible housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families.
<b>Local Economy</b>	Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries. Employment opportunities will be retained and promoted in appropriate employment locations.
<b>Town Centres</b>	Town centres (including Metropolitan, District and Local centres) will continue to be attractive, vibrant hubs for investment containing appropriate town centre uses, including thriving evening and night-time economies.

The Spatial Vision for the Borough is presented in Box 3-1.

### **Box 3-1: Harrow Local Plan Spatial Vision**

In the year 2041 Harrow will continue to be a thriving outer London Borough, helping London to grow sustainably while maintaining its own identity. There will be a resounding sense of pride in Harrow, it is a place that people want to live, work and visit.

The borough's housing and economic needs will be met and development will respect the character of the borough and its capacity to evolve over time. This will include conserving and enhancing the unique historic environment in Harrow and safeguarding protected views.

The diverse Harrow community will benefit from an ever-improving quality of life, having a well-connected borough that provides excellent local access to a range of facilities, services, housing, employment, and nature including access to blue and green infrastructure .

Harrow will be a clean and safe borough where residents can settle in homes that suit the needs of their household and lifestyle and help support sustainable and cohesive communities.

Residents and businesses will benefit from the creation of sustainable neighbourhoods where housing, local services, employment, and facilities are within walking and cycling distance. Residents will be healthier and happier due to localised provision of goods and services.

Town centres will be revitalised through innovative measures adapting to their changing roles as places of leisure, arts and culture, in addition to work and retail hubs. Town centres will be exciting places for people to live should they choose.

The borough has continued to respond to the climate emergency and realising the benefits of taking early action to improve our environment. New developments have been energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents benefit from clean energy and reduced energy consumption.

Air quality will have significantly improved through shifts to sustainable transport and electric cars. Active transport and EV infrastructure has been bolstered to facilitate the transition. Recycling rates will be some of the best in London.





The borough will see increased rates of biodiversity through the protection and enhancement of existing green spaces, and the provision of additional spaces alongside development. The green belt and metropolitan open land will continue to be the lungs of the borough through enhancement projects.



## 4.0 Review of Other Programmes and Plans

### 4.1 Introduction

The policy context in which the Local Plan is being prepared can best be understood through a review of related Policies, Plans and Programmes (PPP). The SEA Regulations require information on:

*“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.” (Schedule 2, Paragraph 1); and*

*“The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.” (Schedule 2, Paragraph 5)*

The review process ensures that the Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Local Plan and the IIA.

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 4-1 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the IIA and has helped to inform the IIA Framework of objectives and assessment questions. The review of PPP was updated in November / December 2023 in response to the Scoping Report consultation comments received.

### 4.2 PPP Review - Summary of Key Messages

Table 4-1 sets out the key messages drawn from the review of PPP. In Appendix A, some topics have been combined because the PPP related to them overlap or are very similar.

The messages presented in Table 4-1 are reflected within the detailed proposed IIA Framework which can be found in Section 2 of this report.



**Table 4-1: Key Messages of the PPP**

IIA Topic	Key Messages from Review
Economy and Employment	<ul style="list-style-type: none"> <li>• Drive productivity and growth in the Borough’s priority areas, particularly the Harrow and Wealdstone Opportunity Area;</li> <li>• Create jobs and prosperity;</li> <li>• Support economic growth and productivity, having regard to local industrial strategies and other local policies for economic development and regeneration;</li> <li>• Encourage long term investment in economic capital, including infrastructure, skills and knowledge;</li> <li>• Promote a dynamic economy that encourages innovation;</li> <li>• Planning policies should set a criteria or identify strategic sites for local and inward investment and seek to address potential barriers to investment;</li> <li>• Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices;</li> <li>• The use of previously developed land and sites that are physically well-related to existing settlements should be encouraged;</li> <li>• Securing investment to deliver world class infrastructure and connectivity;</li> <li>• Green jobs will be a significant part of employment creation opportunities in Harrow in the near term.</li> </ul>
Population and Equalities	<ul style="list-style-type: none"> <li>• To ensure fair and equal access to services and support irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity;</li> <li>• There is a need to plan for the housing needs of the older population as well as young families;</li> <li>• Provide opportunities for members of the community to mix and meet;</li> <li>• Ensure integrated approach to housing, community facilities and services;</li> <li>• Design out crime and the fear of crime;</li> <li>• Improve social mobility;</li> <li>• Tackle poverty and inequality;</li> <li>• Ensure that all groups of society have been equally consulted; and engaged with in the planning process.</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Planning policies should aim to achieve healthy, inclusive and safe places;</li> <li>• Improve public health and wellbeing by connecting people with nature;</li> <li>• Increase the proportion of people regularly exercising;</li> <li>• Promote healthier lifestyles and reduce obesity;</li> <li>• Deliver high quality open spaces that meet the needs of local residents and are accessible to all.</li> </ul>



IIA Topic	Key Messages from Review
Housing	<ul style="list-style-type: none"> <li>• Meet future housing need. The NPPF requires local authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;</li> <li>• Ensure that housing growth requirements are accommodated in the most sustainable way;</li> <li>• Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local family housing needs;</li> <li>• There is a need for a mix of housing that will be attractive to older people and those with care needs, including new mixed tenure 'care ready' age designated housing;</li> <li>• Ensure there is an adequate supply of adapted households, specifically wheelchair user dwellings;</li> <li>• Ensure an adequate supply of affordable housing in line with the London Plan 2021;</li> <li>• Ensure an adequate number of gypsy and traveller pitches.</li> </ul>
Transport and Accessibility	<ul style="list-style-type: none"> <li>• Contribute to tackling climate change by developing and promoting low carbon travel choices;</li> <li>• Support the move to low emission vehicles;</li> <li>• Encourage sustainable transport and reduce the need to travel;</li> <li>• Make the fullest possible use of public transport, walking and cycling; make cycling and walking a natural choice for shorter journeys.</li> <li>• Create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles;</li> <li>• Have an integrated, well managed and inclusive rights of way and access network;</li> <li>• Local planning authorities should support the expansion of electronic communications networks.</li> </ul>
Air, Noise & Light	<ul style="list-style-type: none"> <li>• Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives;</li> <li>• Reduce contributions to climate change by developing and promoting low-carbon travel choices;</li> <li>• Promotion of walking and cycling as healthy and more preferable options to car for local journeys;</li> </ul>



IIA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Minimise pollution and other adverse effects on the local and natural environment;</li> <li>• Planning policies should limit the impact of light pollution from artificial light, and noise pollution from development, on local amenity and nature conservation.</li> </ul>
Climatic Factors	<ul style="list-style-type: none"> <li>• Increase resilience to climate change impact through the location, mix and design of development;</li> <li>• Adapt to climate change e.g. considering future climate change risks when allocating development sites;</li> <li>• Manage flood risks in an appropriate way taking account of the needs of the communities and the environment;</li> <li>• Reduce the level of flood risk to the residents of Harrow and include natural flood management where possible which would provide additional benefits to residents compared to traditional hard engineered flood solutions;</li> <li>• Avoid development in areas of flood risk;</li> <li>• Improve flood awareness and emergency planning;</li> <li>• Reducing the need to travel and providing sustainable transport to help mitigate climate change by reducing emissions;</li> <li>• Promote low carbon economies and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050;</li> <li>• Minimise the effects of climate change;</li> <li>• Increase the resilience of homes and buildings.</li> <li>• Ensure infrastructure is located, planned, designed and maintained to be resilient to climate change;</li> <li>• Support energy efficiency and other sustainability improvements to existing buildings;</li> <li>• Continue to cut greenhouse gas emissions in order to mitigate the climate emergency declared by Harrow Borough Council.</li> <li>• Maximise the potential of Green Infrastructure;</li> <li>• Encourage the provision of renewable energy. Change to 'provide opportunities for renewable and low carbon energy technologies';</li> <li>• Increase energy efficiency and move towards a low carbon economy;</li> <li>• Support the aims of the London Plan 2021 for becoming a zero-carbon city by 2050.</li> </ul>
Biodiversity, Geodiversity, Flora & Fauna	<ul style="list-style-type: none"> <li>• Protect and enhance biodiversity, including designated sites, designated water bodies, priority species, habitats and ecological networks;</li> <li>• Provide accessible natural green and blue space;</li> </ul>



IIA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Minimise impacts on biodiversity and provide net gains in biodiversity in line with NPPF, Environment Act 2021 and Levelling-Up Act 2023;</li> <li>• Need to recognise the wider benefits of ecosystem services;</li> <li>• Biodiversity enhancement in and around development should be led by a local understanding of ecological networks;</li> <li>• Create buffer zones around high-quality habitats;</li> <li>• Plant and manage trees, forests, and woodlands so that they are fit for the future;</li> <li>• Maximise the potential of Green Infrastructure and develop it for healthy communities and ecosystems;</li> <li>• Aim to prevent harm to geological conservation interests;</li> <li>• To maintain and enhance geodiversity through the management of sites, areas and wider landscapes;</li> <li>• To increase recognition of our geodiversity in international, national, regional environmental and planning development policies and legislation;</li> <li>• Support the aims of the London Plan 2021 for enriching biodiversity and geodiversity.</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• Conserve and enhance the significance of international, national and local designated heritage assets including locally significant historic buildings, as well as their settings;</li> <li>• Improve the condition of heritage 'at risk' in the Borough;</li> <li>• Maintain and enhance access to cultural heritage assets;</li> <li>• Preserve and enhance Conservation Areas in Harrow Borough;</li> <li>• Ensure development in or adjacent to Conservation Areas or Listed buildings (and their settings) respects their character and context and enhances the quality of the built environment;</li> <li>• Ensure that any alterations or repairs to traditional buildings preserve and where possible, improve the character and appearance of the building. Ensure these include no damage to natural habitats (e.g. bats and swift nests) and that contractors are trained and mindful in protecting these habitats;</li> <li>• Promote the use of sustainable materials, providing this conserves/enhances the significance of heritage assets;</li> <li>• Protect the historic environment for the benefit of our own and future generations;</li> <li>• Maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and enhance valued and historic landscapes, biological and geological conservation interests, and soils. Harrow on the Hill and</li> </ul>



IIA Topic	Key Messages from Review
	<p>Harrow Weald Ridge are considered as the most important landscape features in Harrow;</p> <ul style="list-style-type: none"> <li>• Recognise the wider benefits from natural capital and ecosystem services;</li> <li>• Seek to promote or reinforce local distinctiveness;</li> <li>• Recover nature and enhance the beauty of landscapes;</li> <li>• Maintain and enhance the overall quality and diversity of landscape character across the Borough;</li> <li>• Seek to protect Green Belt and Metropolitan Open Land across the Borough;</li> <li>• Maximise the potential of Green Infrastructure;</li> <li>• Promote connectivity between residents and open spaces through the Harrow Green Grid;</li> <li>• There are major economic benefits to be gained from natural capital and their value should be considered and incorporated into decision-making in relation to land use.</li> </ul>
Soils, Water & Minerals	<ul style="list-style-type: none"> <li>• Promote sustainable use of water as a natural resource.</li> <li>• Improve water efficiency;</li> <li>• Promote sustainable and water efficient development, including retrofitting of SUDs;</li> <li>• Ensure that groundwater and surface water quality is improved or maintained where possible;</li> <li>• Protect and enhance groundwater, reducing any upward trends in pollution;</li> <li>• Minimise the amount of water lost through leakage each year.</li> <li>• Planning can ensure water quality and the delivery of adequate water and wastewater infrastructure;</li> <li>• Meet national and localised water quality and wastewater targets;</li> <li>• Ensure Water Framework Directive (WFD) designated water bodies and their supporting elements are protected and enhanced;</li> <li>• Create and nurture high value wildlife waterway habitats and contribute to minimising the impact of climate change;</li> <li>• Remediate land contamination and be cognisant of any potential risks to ground condition;</li> <li>• Protect soil quality and avoid soil pollution;</li> <li>• Encourage the use of previously developed (brownfield) land;</li> <li>• Effective soil protection during construction;</li> <li>• Sustainable management of soils. To promote the efficient supply and use of minerals;</li> <li>• Ensure infrastructure is located, planned, designed and maintained to be resilient to climate change;</li> </ul>



IIA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Restore river systems to support climate change resilience as well as manage flood risk and support human health by providing open and green spaces.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Ensure the design and layout of new development supports sustainable waste management;</li> <li>• Encourage and support with Circular Economy where possible.</li> <li>• Waste should be managed in line with the waste hierarchy:               <ul style="list-style-type: none"> <li>○ Prevent or reduce waste;</li> <li>○ Reuse;</li> <li>○ Recycle;</li> <li>○ Other recovery methods; and</li> <li>○ Dispose.</li> </ul> </li> <li>• Meet national, regional and localised waste targets including those on landfill, reuse and recycling;</li> <li>• Safeguard existing waste management sites;</li> <li>• To provide protection to the local environment and residents, whilst ensuring the provision of waste management facilities in accordance with Government policy and society's needs.</li> </ul>





## 5.0 Summary of Baseline Data

The detailed baseline is contained within Appendix B. This section of the IIA report outlines a summary of the information contained within the appendix- specifically key sustainability issues- presented by IIA topic. The baseline data in this section and in Appendix B was updated following consultation on the IIA Scoping Report between December 2023 and February 2024, and consultation on the Regulation 18 IIA Report between March 2024 and April 2024.

Table 5-1 summarises the key sustainability issues within Harrow, as well as the likely evolution of such issues over the lifetime of the Local Plan.



**Table 5-1: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan**

Sustainability Issues	Description	Likely Evolution Without the Plan
<b>Economy and Employment</b>		
Lack of economic activity	There is reduced economic activity across Harrow, including in Harrow town centre and Wealdstone industrial area, and smaller town centres such as Burnt Oak, North Harrow and Rayners Lane.	Without the Local Plan, the economic growth of the Borough is likely to be limited further.
Limited delivery of employment land	Employment land delivery within the Borough has historically been low.	Without the Local Plan, the provision of employment land is likely to be limited due to pressure from housing development. This could result in economic growth of the Borough being limited further.
<b>Population and Equalities</b>		
Population Increase	The population of the Borough will continue to increase significantly.	Without the Local Plan, average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen. A shortfall in primary and secondary school places, as well as Special Educational Needs and Disability (SEND) school places are also likely to persist. Without the Local Plan it may be more difficult to direct new housing growth to locations where sufficient infrastructure capacity exists to accommodate additional needs and/or within accessible distances (e.g. schools/education provision).
Deprivation	Social deprivation is an issue for parts of Harrow, particularly the North, centre, and the South of the Borough.	Without the Local Plan, average house prices are likely to remain high and the provision of affordable housing is likely to remain small. As a result, the baseline situation could continue or worsen.
Dependant population	The Borough has an ageing population, with 19.7% of the Borough's residents predicted to live past 65 by 2031, resulting in an increasingly dependent population with	Without the Local Plan to encourage and facilitate the delivery of a mix of new, accessible housing and new community facilities, the baseline situation of an ageing population will continue.



Sustainability Issues	Description	Likely Evolution Without the Plan
	resulting health and social care issues.	
Crime	Crime rates within the Borough are relatively low, however fear of crime is considered an issue locally.	Without the Local Plan to discourage crime and acquisition across the Borough, the baseline situation is likely to continue.
<b>Health</b>		
Life expectancy	Levels of deprivation vary throughout the Borough; life expectancy is 7.8 years lower for men and 5.4 years lower for women in the most deprived areas of Harrow than in the least deprived areas.	Without the Local Plan, health prospects may worsen, particularly in the most deprived areas, creating a larger gap in the life expectancy between Borough wards.
Health issues	There are a range of health issues across the Borough. Healthy life expectancy for Harrow is subsequently lower than neighbouring Boroughs.	Without the Local Plan, health prospects may worsen creating more pressure on the National Health Service and poor health in residents (e.g. obesity, tooth decay), and health issues associated with poor air quality.
Access to open space	More than 25% of Harrow is classed as Areas of Deficiency suggesting access to open space in these areas, specifically in the central and Southern section of the Borough where population density is higher, is limited.	Policy intervention from the Local Plan could support improving levels of physical activity through walking and cycling, improving access to facilities and services by these modes through improvements to the public realm and improving access to open space, particularly in areas of deprivation.
<b>Housing</b>		
Housing mix and affo mix of housing to be	Without the Local Plan, the Council is likely to be less effective in encouraging	Without the Local Plan, the Council is likely to be less effective in encouraging housing in the most sustainable locations, and ensuring the



Sustainability Issues	Description	Likely Evolution Without the Plan
<p>provided across the Borough, relating to type, size and tenures. There is a particular need for family sized housing. The average house prices across the Borough are high, particularly in relation to low wage levels. There is subsequently a shortage of affordable housing across the Borough to meet the overall needs identified.</p>	<p>housing in the most sustainable locations, and ensuring the right type, size and tenure of housing is delivered to address local needs. This may adversely impact existing social, economic, environmental, and health inequalities and issues. Average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen.</p>	<p>right type, size and tenure of housing is delivered to address local needs. This may adversely impact existing social, economic, environmental, and health inequalities and issues. Average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen.</p>
<p>Sustainable Locations</p>	<p>The London Plan seeks to direct higher levels of housing growth to the most accessible and sustainable locations of the Borough which it has identified as the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre), followed by Edgware Major Centre, and the District and</p>	<p>Without the Local Plan, housing delivery could be constrained in the short term, although in the longer-term, requirements in the NPPF to have a five-year supply of housing sites would enable the further delivery of housing sites to meet need, through the planning application process. However, this would be on an ad-hoc basis and may potentially not be located in the most sustainable locations (e.g. where sufficient infrastructure capacity exists to accommodate additional needs).</p>



Sustainability Issues	Description	Likely Evolution Without the Plan
	local centres across the Borough.	
<b>Transport and Accessibility</b>		
Poor cycle networks	There are a number of barriers to cycling in the Borough, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft.	Without the Local Plan, poor cycle networks could restrict the expansion of people using cycling as a means to travel, as well as threaten the safety of cyclists. Workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users.
Public transport demand and accessibility	The accessibility of public transport remains an issue within Harrow. Accessibility to public transport is low in some areas of deprivation, particularly to the North of the Borough and accessible, step-free entrances are not available at all tube stations. This is a significant issue as a significant proportion of disabled residents rely on public transport links. Harrow bus station is also operating over capacity.	Without the Local Plan and policy intervention to improve the transport network, workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users. Without investment into the accessibility of public transport, current options may not meet the needs of the future population in the long term, which is expected to increase.
<b>Air, Noise and Light</b>		
Worsening of air quality	Air quality concerns remain an issue within the Borough, and Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues. This is highly likely to be linked to the reliance on private petrol/diesel fuelled	Without policy intervention and significant investments, the target to achieve carbon neutrality and therefore improve air quality in the Borough will not be achieved. Development within the AQFA could also exacerbate current air pollution by increasing the number of people travelling by private vehicles.



Sustainability Issues	Description	Likely Evolution Without the Plan	
	vehicles as the primary mode of transport.		
Noise and Light Pollution	Development could also contribute to the creation of noise and light pollution within the Borough, through construction works or inappropriately located development.	Noise and light pollution levels are likely to worsen without the Local Plan; this is due to uncontrolled development, particularly in rural areas. This is likely to have adverse impacts on wellbeing.	
<b>Climatic Factors</b>			
Contributions to climate change	Harrow Borough currently has minimal resilience to climate change or renewable energy capacity. Domestic and transport emissions are the main contributors of CO <sub>2</sub> in the Borough as residents are reliant on petrol/diesel fuelled vehicles.	Without the Local Plan to encourage and facilitate resilience to climate change and the implementation of renewable energy generating developments, the baseline situation is likely to continue, or worsen with development. This will make it unlikely that Harrow Borough achieves its commitment to becoming carbon neutral by 2030.	
Flood risk	The Boroater flood events. Properties in Harrow stand to experience a 97% increase in internal hydraulic sewer flooding and a 35% increase in external hydraulic sewer flooding by 2050.	Flood risk is likely to become worse with climate change and the increased occurrence of extreme weather events, affecting the intensity and frequency of precipitation. Without the Local Plan guiding development to areas of lowest flood risk, the risk of development occurring in areas of higher flood risk could increase. The importance of sustainable adaptation measures to flood risk, such as SUDs, will also be dismissed without the Local Plan.	Flood risk is likely to become worse with climate change and the increased occurrence of extreme weather events, affecting the intensity and frequency of precipitation. Without the Local Plan guiding development to areas of lowest flood risk, the risk of development occurring in areas of higher flood risk could increase. The importance of sustainable adaptation measures to flood risk, such as SUDs, will also be dismissed without the Local Plan.
<b>Biodiversity, Geodiversity, Flora and Fauna</b>			



Sustainability Issues	Description	Likely Evolution Without the Plan
Pressure on protected species' habitats	There are a range of nature conservation sites and designated water bodies within the Borough which require protection from development. Potential effects on European designated Habitats Sites needs to be considered.	Development pressures could worsen without the Local Plan policies to guide development to the least sensitive parts of the Borough , and provide wildlife corridor zones. This could lead to continued degradation and possible loss of nature conservation sites, designated water bodies, and species. Further population growth could also increase pressure on existing nature areas, due to the lack of access opportunities.
<b>Cultural Heritage</b>		
Threats to the historic environment	There are a number of heritage assets and conservation areas likely to be impacted by development within the Borough. There are 19 assets on the heritage at risk register. There is pressure from development on the settings and significance of heritage assets and on wider historic landscapes and townscapes.	Without the Local Plan policies which protect heritage assets from the potential negative effects of development and encourages enhancements, the baseline situation is likely to continue.
<b>Landscape and Townscape</b>		
Threats to landscape	21.5% of the Borough is identified as Green Belt land and 6.2% is protected as Metropolitan Open Land.	Without the Local Plan policies which protect the certain areas of the landscape from the possible impacts of development, the baseline situation is likely to continue. Development pressures on Green Belt and Metropolitan Open Land are likely to contribute to landscape character degradation.
<b>Soils, Water and Minerals</b>		
Water resources	There is high demand for water resources across Harrow, as residents currently use more water per day than the London average. None of the waterbodies within the Borough	It is likely that increases to population will drive further water demand within the Borough. This is likely to place strain on both demand, as well as wastewater treatment services. Without the local plan encouraging efficiency measures such as SUDs to reduce flood risk and encourage quality, water resources are likely to be negatively affected.



Sustainability Issues	Description	Likely Evolution Without the Plan
	are currently achieving 'good' overall status, and two waterbodies received an 'poor' overall status.	
<b>Waste</b>		
Waste	Less than two fifths of waste is recycled, reused, or composted within the Borough. As a result, the Borough falls within the lowest quartile for recycling in England.	With an increasing population within the Borough, it is likely that the amount of waste produced will continue to rise. Without the local plan, this will result in even less waste being recycled, reused or composted and is likely that the waste hierarchy will not be followed effectively.





## 6.0 Alternatives

### 6.1 Introduction

Where there are reasonable alternatives to the preferred elements of a plan (i.e. policies, sites, spatial strategy) the IIA must assess them to the same level of detail and present the sustainability performance to allow comparison with the preferred options. This provides information to enable informed choices to be made between options and alternatives. Commentary is provided within this Section focussing on the potential significant effects of the reasonable alternatives and the reasons for selecting the preferred options.

The full wording of the reasonable alternatives for the plan policies can be found within Appendix C along with a summary of the performance of each option which allows comparison between options. All reasonable alternatives have been assessed to the same level of detail as the preferred policies and all are included within Appendix C. The detailed assessment spreadsheets for the preferred policies can be found in Appendix D and the results are presented in Section 7. The detailed assessment spreadsheets for all policy alternatives can be found in Appendix E.

Appendix C includes further information on the spatial strategy alternatives and the justification for the identification of the three spatial strategy options (referred to within this chapter as the preferred spatial strategy, spatial strategy alternatives 1 and 2).

Site allocation options have been identified by LBHC with the intent of meeting the Borough's identified housing requirement over the plan period, including a buffer to accommodate potential under-delivery. Site options have also been identified, where required, to accommodate additional non-residential and infrastructure development to meet identified need. As set out below, reasonable alternative site options have been identified in line with the NPPF, planning practice guidance, the London Plan and the spatial strategy and strategic policies of the draft Local Plan.

A process has been followed by LBHC to identify whether the site options were reasonable alternatives and therefore should be subject to assessment through the IIA. The process involved:

- Site identification;
- Initial site eligibility sifting;
- Site suitability assessment; and
- Detailed assessment (including site capacity, availability and deliverability).

This process is described in more detail in Section 6.8.

### 6.2 Policies

This section sets out the spatial strategy and other policy alternatives and provides commentary on the performance of rejected alternatives and the reasons for selecting the preferred spatial strategy and other policies.



## 6.2.1 Spatial Strategy Alternatives

<p><b>Spatial Strategy: Preferred</b></p>	<p><b>Evolution of existing spatial strategy included within the Core Strategy and updates this to ensure compliance with the London Plan 2021 (e.g. Policies SD1,6,7; HS1,2; GG2, etc).</b></p> <p><i>This strategy seeks to deliver a minimum of 16,040 homes (2021-41), 1000 jobs and other uses to address local needs; via prioritising the intensification, re-development of previously developed sites for mixed uses, town centre and residential uses within the most sustainable, accessible locations of the Borough's existing built-up area, where infrastructure capacity exists.</i></p> <p><i>The key aspects of this strategy are outlined below;</i></p> <p><b>(1) Housing Growth:</b> <i>The key locations proposed to accommodate housing growth are;</i></p> <ul style="list-style-type: none"> <li>a) <i>Harrow &amp; Wealdstone Opportunity area. This is expected to accommodate a significant level of the borough's housing growth i.e. circa 8,750 homes, 1000 jobs). This is the most sustainable for accessing local facilities, services, employment and most suitable location for high density development</i></li> <li>b) <i>Town Centres: The secondary focus for addressing housing needs will be on sites within and the edge of town centres, particularly the larger centres i.e. major and district centres), to support the regeneration of these and vitality, viability of these,</i></li> <li>c) <i>Small Sites: In line with London Plan Policy H2, the delivery of additional housing on small sites (below 0.25ha) will be supported in locations with good transport accessibility (PTAL 3-6), sites within 800m of rail/tube station and 800m of a town centre boundary (i.e. Metropolitan, Major, District)</i></li> <li>d) <i>Windfall sites: Development of additional housing on these sites will be supported, if they comply with Local Plan policies, particularly the character of an area.</i></li> </ul> <p><b>(2) Employment:</b> <i>This seeks to deliver additional employment floor space via the redevelopment/intensification of sites within within/edge of town centres for mixed use development to promote vitality, viability and regeneration. Further it supports the intensification/redevelopment of sites within employment uses to provide enhanced/additional floorspace, as well as seeks to protect and maintain the existing stock of employment land floor space (particularly areas designated as SIL, LSIS).</i></p> <p><b>(3) Borough Assets:</b> <i>The Plan seeks to protect , and enhance; land designated as Green Belt, MOL, opens spaces, social infrastructure from being lost to/impacted by development, as well as the character of area and historic environment. The Royal National Orthopaedic Hospital (i.e. Previously developed land) was allocated for mixed use development to provide</i></p>
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	<p><i>new/enhanced healthcare facilities, residential and other uses; along with a gypsy and traveller site, at Watling Farm; within the Green Belt.</i></p>
<p><b>Spatial Strategy: Alternative 1</b></p>	<p><b>Retain existing spatial strategy of the Core Strategy (adopted 2012):</b>  <i>This seeks to deliver 6,050 additional homes and 4000 jobs, via the prioritising the intensification/development of previously developed sites to address local needs, largely within the Borough’s existing built-up area. The key aims were to ensure residents have good access to facilities/services, promote the vitality/viability and regeneration of town centres , as well as delivery the supporting infrastructure.</i></p> <p><i>The key aspects of this strategy are outlined below:</i></p> <p><b>(1) Housing/Employment growth:</b> <i>The key locations for growth are:</i></p> <p>a) <b>Harro Wealdstone Intensification Area:</b> <i>This is primary focus of growth and expected to accommodate 2,800 additional homes and 3,000 jobs, as well as deliver the supporting infrastructure, to ensure most residents have good access to local facilities, services, (including public transport), employment opportunities.</i></p> <p>b) <b>Town Centres:</b> <i>The secondary focus for growth is to promote development sites within and on the edges of existing district and local centres, to address needs and promote their vitality/viability, as well as enable the delivery regeneration of these via public realm improvements</i></p> <p>c) <b>Strategic brownfield sites and regeneration areas:</b> <i>The plan included sites/areas to deliver additional housing anew/enhanced supporting infrastructure and the regeneration of deprived areas (e.g. Council estates). It should be noted most of these sites/areas have already been developed.</i></p> <p><b>(2) Employment:</b> <i>This seeks to deliver additional employment floor space via the redevelopment/intensification of sites within/edge of town centres for mixed use development to promote their vitality, viability and regeneration. Further, it promotes the intensification/redevelopment of employment sites to provide enhanced/additional floor space. It seeks to protect and maintain the existing stock of employment floor space (particularly areas designated as SIL, LSIS), with the exception of the former Kodak site that was partially released for mixed employment and residential uses).</i></p> <p><b>(3) Borough Assets:</b> <i>This seeks to protect, and enhance; land designated as Green Belt, MOL, opens spaces, social infrastructure from being lost to/impacted by development, as well as protect the character of area and historic environment. The Royal National Orthopaedic Hospital (i.e. previously developed land) was allocated for mixed use development to provide new/enhanced healthcare facilities, residential and other uses; along with a Gypsy and Traveler site (Watling Farm) are within the Green Belt.</i></p>



<p><b>Spatial Strategy: Alternative 2</b></p>	<p><b>Spatial strategy to enable the accommodation of a higher level of growth:</b></p> <p><i>This strategy would seek to deliver a level of housing growth higher than the minimum housing target set by the London Plan 2021 and beyond the objectively assessed needs for employment, retail and cultural / leisure floorspace and potentially infrastructure capacity. This would potentially meet a greater proportion of the Borough's Objectively Assessed Housing Needs; such as a housing growth requirement of 24,266 identified by the Local Housing Need Assessment (or a higher need figure calculated by the Government's standard methodology). This will require the Council to explore all options to accommodate a higher level of housing via prioritisation the intensification/redevelopment of previously developed sites within the Borough's existing built up area. However, the existing urban area will have insufficient deliverable capacity to fully meet the higher level of housing requirement. Therefore, this is likely to require the consideration of the potential release of greenfield sites with the Green Belt, MOL and employment sites in less sustainable/accessible locations to address future housing needs.</i></p> <p><i>The key aspects of this strategy are outlined below:</i></p> <ul style="list-style-type: none"><li><b>(1) Housing Growth:</b> <i>The key locations for growth listed in the preferred strategy above (i.e. Opportunity Area, Town Centres, small sites) are likely to be required to accommodate a larger level of housing via higher density developments . But this may have an adverse impact on the character of the Borough (particularly suburban locations that predominately 2-3 storeys) and the existing infrastructure capacity. Further, it may result in the reliance on a higher level of on windfall sites in less sustainable and accessible locations</i></li><li><b>(2) Employment:</b> <i>The strategy seeks to deliver additional employment floor space via the redevelopment/intensification of sites within within/edge of town centres for mixed use development and redevelopment of employment/intensification of employment site. But a higher level of housing requirement is likely to require the release/loss of employment land to provide additional housing. It may also make it more difficult to protect the existing stock of employment land and the mixed-use schemes in town centres</i></li><li><b>(3) Borough Assets:</b> <i>This seeks to protect, and enhance; land designated as Green Belt, MOL, opens spaces, social infrastructure from being lost to/impacted by development. However a higher level of housing requirement is likely to require the release/loss of Greenfield sites within the Green Belt, MOL or open spaces, in less sustainable locations where infrastructure lacks capacity or does not exist. Further, this may have an adverse effect on the Borough Character, the historic environment, biodiversity and increase unsustainable commuting patterns.</i></li></ul>
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Potential significant positive effects have been identified in relation to IIA1 (Economy), IIA5 (Housing) and IIA6 (Sustainable Travel) for the preferred Spatial Strategy policy and the two alternatives. A potential significant positive effect has also been identified in relation to IIA12 (Landscape and Townscape) for Spatial Strategy Alternative 1. Spatial Strategy Alternative 1 may have a more significant positive effect on IIA12 (Landscape and Townscape) as the policy text is more restrictive than the preferred policy text in terms of safeguarding vulnerable areas from development. For example, the text of Spatial Strategy Alternative 1 safeguards suburban areas as areas of low density, family housing in order to protect suburban character, as well as protecting the Borough's Metropolitan Open Land, Green Belt and other open space (including gardens) from development. This has resulted in a more positive performance of the Spatial Strategy Alternative 1 in relation to IIA12 (Landscape and Townscape) compared to the preferred policy, as can be seen in Appendix C.

Four potential significant negative effects have been identified for Spatial Strategy Alternative 2 in relation to IIA10 (Biodiversity and Geodiversity), IIA11 (Historic Environment), IIA12 (Landscape and Townscape) and IIA13 (Water and Soil). This alternative seeks to go beyond the level of development identified in the proposed strategy and provide more employment, retail and cultural / leisure floorspace. As a result, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact efforts to conserve and enhance biodiversity and the historic environment, as well as protection of landscape/townscape character and natural resources.

The spatial strategy which is the evolution of the existing spatial strategy included within the Core Strategy updated to ensure compliance with the London Plan 2021 (e.g. Policies SD1,6,7; HS1,2; GG2, etc) has been selected by LBH as the preferred policy option. The key reasons are:

- (1) In line with the London Plan (2021) and National Policy, this strategy will enable the Local Plan to identify/allocate a sufficient supply of deliverable previously developed sites within the existing built-up area, to address the Boroughs housing needs, particularly for affordable and family sized housing;
- (2) It will encourage new housing development within the most accessible, sustainable locations of the Borough, such as; the Opportunity Area that is suitable location for high density development; within/edge of Town Centres and transport hubs, where infrastructure capacity exists/or can be increased to accommodate additional demands. This will ensure residents have good accessibility, to local facilities, services, employment opportunities via sustainable modes of transport, to reduce carbon emissions and address the causes/effects of climate change.
- (3) In compliance with the London Plan (2021), this will help maintain and protect the existing supply of employment land, promote the urban regeneration, as well as protect and enhance the Green Belt, MOL, open spaces and the Borough character.
- (4) The IIA assessment indicates that the preferred option generally performs well. It performs similarly to Alternative 1 but better meets the objectives relating to IIA7 (Air, Noise and Light Pollution and IIA8 (Climate Change Adaptation). Alternative 1 performs better than the preferred option with relation to landscape and townscape.



## 6.2.2 Performance of High Quality Growth Policy Alternatives

**Strategic Policy 01: High Quality Growth** – no reasonable alternatives identified.

**Policy GR1: Achieving a High Standard of Development** – no reasonable alternatives identified.

**Policy GR2: Inclusive Neighbourhoods** – no reasonable alternatives identified.

**Policy GR3: Public Realm and Connecting Places** – no reasonable alternatives identified.

**Policy GR3A: Inclusive Design**- no reasonable alternatives identified.

**Policy GR3B: Safety, Security and Resilience to Hazards**- no reasonable alternatives identified.

**Policy GR4: Building Heights** – no reasonable alternatives identified.

**Policy GR4A: Basement Development**- no reasonable alternatives identified.

**Policy GR5: View Management**- no reasonable alternatives identified.

The above policies have been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan

<p><b><i>Policy GR6 Areas of Special Character: Preferred</i></b></p>	<p><b><i>Outlines how development proposals in special character areas will be considered. Proposals affecting an area of special character will be assessed against a set of criteria, including impact on strategic value, desirability of preserving or enhancing the environmental, architectural, historic and landscape features and protected views. Proposals that would substantially harm an area of special character, or its setting, will be refused.</i></b></p>
<p><b><i>Policy GR6: Alternative 1</i></b></p>	<p><b><i>No Policy Option</i></b></p>

No potential significant positive effects have been identified for policy GR6 Areas of Special Character policy or its alternative. An uncertain effect has been identified in relation to GR6 Reasonable Alternative 1 as the lack of a policy removes the ability of the Council to set expectations for development and protect Special Character Areas. This may lead to degradation of areas of special character, including those which are areas of open space. It is uncertain whether this could lead to reduced access to currently identified areas of special character, which could affect wellbeing and healthy lifestyles (IIA4).

The preferred alternative for Policy GR6 seeks to protect the contribution that the elevated parts of the borough make to the distinctive local character of the borough. This strengthens the Council's ability to ensure; development proposals consider their potential impact on areas of special character; they are well designed and protect and enhance the character of these. The Council has proposed to select the preferred



alternative, as this achieves a higher level of positive effects against the IIA objectives, compared to the alternative that achieves negative/neutral effects.

**Policy GR7: External Lighting** – no reasonable alternatives identified.

**Policy GR8: Shopfronts & Forecourts** – no reasonable alternatives identified.

**Policy GR9: Outdoor advertisements, digital displays and hoardings** - no reasonable alternatives identified.

The above policies have been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan

<b><i>Policy GR10 Infill And Backland Sites, Back Gardens and Amenity Areas: Preferred</i></b>	<b><i>Outlines how development proposals on infill and backland sites, back gardens and amenity areas will be considered. Proposals will be assessed against a set of criteria, including how the area incorporates appropriate design, as well as supports the delivery of homes and biodiversity.</i></b>
<b><i>Policy GR10: Alternative 1</i></b>	<b><i>No policy option</i></b>
<b><i>Policy GR10: Alternative 2</i></b>	<b><i>More permissive policy</i></b>

No potential significant positive effects have been identified for the policy GR10 Infill and Backland Sites, Back Gardens and Amenity Areas or its alternatives. A potential significant negative is identified in relation to IIA12 (Landscape and Townscape) for GR10 Alternative 2, as a more permissive policy may mean that there are more proposals for this type of development, they could be less appropriately located, and subsequently may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to. A number of uncertain effects have also been identified in relation to IIA3 (Accessibility), IIA5 (Housing), IIA6 (Sustainable Travel), for GR10 Alternative 2. This is due to the alternative being more permissive than the preferred policy, which may lead to development in areas where delivery of housing is not preferred or required (e.g. the suburban area). This may lead to an over development of homes in certain areas, causing issues on access to local community facilities (education, health) and transport, as supporting infrastructure may not be provided.

The Council has proposed to select the preferred alternative, as this provides a stronger policy basis to determine applications on different types of sites covered by it, whilst balancing this with the need to enable well designed new housing to be delivered in the most suitable sites, to address local needs. This is supported by the IIA that indicates that the preferred policy approach achieves minor positive or neutral effects against the objectives, compared to; alternative 1 that has fewer minor positive effects, some negatives; and alternative 2 that has fewer minor positive effects, a significant negative and a number of uncertain effects.

**Policy GR11: Planning Obligations** – no reasonable alternatives identified.

This policy has been drafted to be consistent with relevant legislation, national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national legislation, national policy or the London Plan.



**Policy GR12: Site Allocations – no reasonable alternatives identified.**

It is considered that there are no reasonable alternatives to this policy as an alternative policy would limit the effectiveness of site allocations.

**6.2.3 Performance of Heritage Policy Alternatives**

**Strategic Policy 02: Heritage – no reasonable alternatives identified.**

**Policy HE1 Heritage Assets – no reasonable alternatives identified.**

**Policy HE2 Enabling Development – no reasonable alternatives identified.**

The above policies have been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

**6.2.4 Performance of Housing Policy Alternatives**

<b>Strategic Policy 03 Meeting Harrow's Preferred Housing Needs:</b>	<b>Meeting Harrow's housing needs: this is rolling forward London Plan housing delivery target of 802 homes per annum for another ten years, so that it totals 16,040 over the plan period (2021-41).</b>
<b>Strategic Policy 03: Alternative 1</b>	<b>High housing growth: include a housing requirement for a total of 24,266 homes (1,213 homes per annum) over the plan period (2021-41) based on demographic led projections considered by the Local Housing Needs Assessment.</b>
<b>Strategic Policy 03: Alternative 2</b>	<b>Low housing growth: stepped trajectory over a fifteen-year plan period.</b>

Two reasonable alternatives were identified in relation to Strategic Policy 03, which are focused around the number of dwellings delivered across the plan period. Alternative 1 would deliver 24,266 dwellings, whilst alternative 2 would deliver 12,829 dwellings. Neither of these alternatives have performed as positively as the preferred approach, as an uncertain effect has been identified in relation to IIA5 (Housing) for Alternative 1 as it could be undeliverable, due to the greater levels of development required. As a consequence of this high level of development, potential significant negative effects are identified in relation to IIA7 (Air, Noise and Light Pollution), IIA10 (Biodiversity), IIA12 (Landscape and Townscape), and IIA13 (Soils and Water) as a higher quantum of development is likely to require development on Green Belt and Metropolitan Open Land. This could have implications with regards to pollution, biodiversity, and character. A potential significant negative effect was identified in relation to IIA5 for Alternative 2 as it would fail to address the acute housing needs of the Borough, particularly for family and affordable housing.

The Council has proposed to select the preferred alternative which is to include a housing requirement/target of 16,040, which rolls forward the London Plan target of 8020 homes for another ten years, to cover the Plan period (2021-41). The key





reasons are; it will ensure a sufficient supply of new housing (including family sized and affordable housing) is delivered to address the Borough's future housing needs, based on housing capacity evidence, in compliance with the London Plan (2021). Further, the preferred alternative will ensure previously developed sites within the most sustainable, accessible locations of the Borough's existing settlement boundary are prioritised to address future housing needs; as well as protect, enhance the Green Belt, Metropolitan Open Land, scarce employment designations and the historic environment; in line with London Plan and National Policy. The IIA assessment indicates the preferred alternative scores a higher level of minor and significant positive effects against the IIA objectives, in contrast to the alternative 1 and 2 that may result in uncertain and significant negative effects.

<b><i>Policy HO1: Dwelling Size Mix: Preferred</i></b>	<b><i>Outlines the approach for ensuring new residential developments deliver a good mix of unit sizes to address needs. It seeks to prioritise the delivery of a higher proportion of family sized housing and ensure 25% (or more) of total units delivered within a scheme are family sized (i.e. 3b/+) and the smallest two bed units are of a sufficient size to accommodate four bed spaces which meets the identified need for family housing.</i></b>
<b><i>Policy HO1: Alternative 1</i></b>	<b><i>Continue with existing policy DM 24 Housing mix.</i></b>
<b><i>Policy HO1: Alternative 2</i></b>	<b><i>Do not include a target to that seeks to ensure 25% of housing delivered on a scheme are family sized dwellings (i.e. three bed or more).</i></b>
<b><i>Policy HO1: Alternative 3</i></b>	<b><i>Include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing.</i></b>
<b><i>Policy HO1: Alternative 4</i></b>	<b><i>Do not apply 25% family housing target to minor development.</i></b>

The alternatives to this policy perform similarly, except for the housing objective (IIA5) due to the nuances between them. Alternative 1 would continue the use of extant policy DM24; Alternative 2 would not include a family housing target; Alternative 3 would include a higher target for family homes than Policy HO1 and Alternative 4 would remove the requirement for family housing from small development sites. An uncertain effect has been recorded for Alternatives 3 and 4, and a potential minor negative for Alternatives 1 and 2.

Alternative 1 constitutes extant Policy DM24: Housing Mix, is a highly permissive policy in relation to the size mix of housing schemes and promoting mixed and inclusive communities. It sets out a size mix for affordable housing and seeks to increase the delivery of affordable housing (including family sized housing, based on consideration of factors such as site location, character of surroundings and the need



to optimise housing output on previously developed land site. Whilst this could help to ensure that there is flexibility to meet changing needs within the Borough, monitoring data indicates that the existing policy is resulting in the delivery of smaller sized dwellings (i.e. 1 or 2 bed and studio units), even though there is a significant need for family sized dwellings (i.e. three bed or more). It is therefore not meeting local needs. It is assumed that current trends would prevail, therefore a minor negative effect has been identified for IIA5 (Housing).

Alternative 2 would still help to achieve the additional residential dwellings needed within the Borough and could help to increase the density of development, however, the size of these dwellings may not meet the identified need for family homes (i.e. 3 beds or more) within Harrow. Therefore, a minor negative effect has been recorded in relation to IIA5 (Housing).

Alternative 3 could help to ensure the identified shortfall of family sized homes (3+ beds) is addressed swiftly across the Borough, throughout the plan period. However, this potential option may have some impact on quantity of housing delivered, as it may reduce the flexibility in the approach for determining an appropriate size mix for housing schemes, based on consideration of factors such as a site location, type of sites and the need to optimise housing output. This could reduce the overall number of homes which can be delivered in the Borough. Due to this, an overall uncertain effect has been recorded.

Alternative 4 is likely to perform very similarly to Policy HO1 as the premise remains the same, bar the exclusion of minor developments from the 25% family dwelling threshold. However, it is noted that a large proportion of sites (47%) are likely to be small (<0.25ha), therefore there is a risk with this alternative that the identified need for additional family homes within the Borough will not be addressed and could in fact worsen. Without a policy requirement, it is uncertain whether family sized housing would come forward on small housing sites. Consequently, an uncertain effect is identified for IIA5 (Housing).

The Council has proposed to select the preferred alternative, as this will provide a stronger policy approach for ensuring a good unit size mix of residential units are delivered within new development to address future needs (particularly for families) and deliver balanced mixed, inclusive communities. This will increase the scope to increase the delivery of family sized housing, by requiring 25% (or more) units within a scheme to be three bed (or more) units and the smallest two bed units to be capable of accommodating four bed spaces in order to be used by families. It recognises some sites may not be able to meet these requirements, as well as the need to balance these requirements with the need to optimise housing output to address needs, site constraints and viability. The IIA assessment indicates the preferred alternative achieves a significant positive effect against the objective relating to addressing housing needs. Further, the approach is supported by Local Plan evidence such as the Local Housing needs assessment.



<b><i>Policy HO2: Conversion and Redevelopment of Dwellings: Preferred</i></b>	<b><i>Outlines the approach for assessing proposals for the conversion and redevelopment of larger homes into smaller self-contained residential units (C3). It seeks to protect family sized housing by requiring proposals to have an internal floor area of 130m<sup>2</sup>. Development should also re-provide at least one family sized home and be located within an accessible area (PTAL 3+).</i></b>
<b><i>Policy HO2: Alternative 1</i></b>	<b><i>Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).</i></b>
<b><i>Policy HO2: Alternative 2</i></b>	<b><i>Policy should not include a minimum 130m<sup>2</sup> size threshold for the conversion/redevelopment of homes into flats.</i></b>
<b><i>Policy HO2: Alternative 3</i></b>	<b><i>Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m<sup>2</sup> capable of providing a three-bed unit with access to a garden.</i></b>
<b><i>Policy HO2: Alternative 4</i></b>	<b><i>Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6</i></b>
<b><i>Policy HO2: Alternative 5</i></b>	<b><i>The proposed housing conversions policy should not apply to demolitions of a larger family sized home.</i></b>
<b><i>Policy HO2: Alternative 6</i></b>	<b><i>Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map.</i></b>

HO2 Alternatives 1-5 do not perform as positively as the preferred policy. Alternative 5 (conversions should not apply to demolitions of larger family housing) performs the most poorly, with potential significant negative effects being identified for IIA5 (Housing), IIA11 (Historic Environment) and IIA12 (Landscape and Townscape). There is potential for HO2 Alternative 6 (restricting conversions to limited areas of the Borough) to result in potentially positive effects, as this would target redevelopment in appropriate locations and protect family sized dwellings in areas which need them most. However, further investigation is needed in order to understand the precise locations for the application of HO2 Alternative 6.

The Council has proposed to select the preferred alternative, as the local housing needs assessment identifies a significant need to increase the provision of family sized housing. This seeks to (1) protect smaller sized family housing that are more affordable



from being lost to multiple units (i.e. floor area of 130m2+) and avoids the delivery of poorly designed flats. (2) Ensure no net loss to stock of family sized housing by requiring the re-provision (3) supports proposals within locations that have good accessibility (PTAL 3-6) to local facilities, services, to promote sustainable modes of transport and reduces the loss of family housing (4) achieve a balance between increasing the delivery of housing and addressing the housing needs of families. The IIA assessment indicates the preferred alternative results in a higher level of positive effects, including a significant positive effect against IIA5 (Housing), compared to the alternatives options.

**Policy HO3: Optimising the use of small housing sites** – no alternatives identified.

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. Due to this, it is considered there are no reasonable alternatives

<b><i>Policy HO4 Genuinely Affordable Housing: Preferred</i></b>	<b><i>Outlines the approach for increasing the provision of genuinely affordable housing and the mix of the right tenure to deliver mixed and inclusive communities. It seeks to prioritise the delivery of a higher proportion (70%) of low cost rented housing.</i></b>
<b><i>Policy HO4: Alternative 1</i></b>	<b><i>To put a greater emphasis on intermediate products.</i></b>

No potential significant effects are identified in relation to Alternative 1. HO4 Alternative 1 does not perform quite as positively as the preferred policy HO4, with a potential significant negative effect being identified for IIA5 (Housing). This is due to the fact that although intermediate products are classed as a type of affordable housing, the Local Housing Needs Assessment shows that they are usually the least affordable out of the options provided. This could subsequently limit provision of truly affordable housing within the Borough.

The Council has proposed to select the preferred alternative, as the Local Housing Needs Assessment indicates there is a significant need to increase the delivery of affordable housing, to deliver mixed and inclusive communities. This prioritises the delivery of a higher levels of low cost rented housing; as this is the most genuinely affordable housing product, based on local incomes and costs. This will help address the housing needs of those who are not catered for by the market, as well as reduce the high levels of homelessness, overcrowding and the need to provide temporary accommodation.



<p><b>Policy HO5 Housing Estate Renewal and Regeneration: Preferred</b></p>	<p><b><i>Outlines the approach to assess and support proposals for the renewal/ regeneration of existing housing estates within the borough, to address the issues facing them and deliver quality housing, including details of design, housing tenure and size and facilities. It includes a criteria to assess proposals that may result in the net loss of open space in exceptional cases.</i></b></p>
<p><b>Policy HO5: Alternative 1</b></p>	<p><b><i>No policy.</i></b></p>
<p><b>Policy HO5: Alternative 2</b></p>	<p><b><i>Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).</i></b></p>

HO5 Alternative 1 is not to have a specific policy on housing estate renewal and regeneration, which does not perform as favourably. Alternative 1 would leave no policy regarding the regeneration of estates within Harrow Local Plan. There are no supporting policies within the NPPF or London Plan which could be relied on in the absence of a Harrow-specific policy, yet there is an identified need to regenerate older estate developments for replacement with newly designed, energy efficient developments. This would help to improve the quality of homes, whilst also providing an opportunity to intensify residential development in existing residential areas. However, it is noted that regeneration without a policy could provide a more attractive proposition for developers, which could increase the likelihood of regeneration. Overall, uncertain effects are likely to result for IIA objectives 3 and 5. The preferred Policy HO5 performs more favourably against the IIA objectives than the Alternatives.

HO5 Alternative 2 requires the re-provision of external amenity space. However, it could have an adverse impact on the delivery of new housing (including the provision of affordable housing), hence an uncertain effect is identified for IIA5 (Housing). This may also impact the potential to provide community infrastructure such as recreational facilities, hence an uncertain effect is identified for IIA3 (Accessibility) and IIA4 (Health and Wellbeing).

The Council has proposed to select the preferred alternative, as this provides a strong basis to consider and support proposals for estate regeneration/renewal, address issues facing them; deliver new homes of the right size, tenure and design to address local needs, as well as a higher quality healthier living environment. Further, it includes a criteria for assessing proposals that may result in a net loss of open space, in exceptional circumstances). This may enable; a high-quality open space and a well-designed scheme to be delivered and other planning benefits (e.g. address priority housing/community needs); as well as improve viability. The IIA assessment indicates the preferred alternative achieves a higher level of significant (i.e. housing, health, sustainable travel) and minor positive effects against the IIA objectives, than the alternatives.



<p><b><i>Policy HO6 Accommodation For Older People: Preferred</i></b></p>	<p><b><i>Outlines the approach for addressing the accommodations needs of older people. It includes criteria to ensure proposals address identified local need and a mix of older accommodation is provided, including wheelchair accessible accommodation and affordable housing. Accommodation should also be located in accessible locations (PTAL 3+) with access to public transport and local facilities. In line with policy SP3, it seeks to deliver 980 units of older person accommodation.</i></b></p>
<p><b><i>Policy HO6: Alternative 1</i></b></p>	<p><b><i>Continue existing Local Plan policy approach (DM 29).</i></b></p>
<p><b><i>Policy HO6: Alternative 2</i></b></p>	<p><b><i>Support proposals within/edge of town centres (excluding neighbourhood centres).</i></b></p>
<p><b><i>Policy HO6: Alternative 3</i></b></p>	<p><b><i>Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2,300 units over a 15-year period.</i></b></p>

Policy HO6 Accommodation for Older People performs positively, as have most of the alternatives. Three alternatives were identified for this policy: Alternative 1 – continue extant policy DM29; Alternative 2 – Support proposals around town centres; Alternative 3 – Include a higher target. None of the three alternative policy options perform as positively as policy HO6, particularly Alternatives 2 and 3. Uncertain effects have been identified in relation to IIA3, IIA4, IIA6 and IIA8 for Alternative 2 as development within, and at the edges of, some town centres could be in areas with low PTAL scores, which could limit access to key services and facilities. Alternative 3 has recorded an uncertain effect for IIA5 (Housing) as this could undermine the Council’s ability to meet other priority housing needs (such as family housing and affordable housing), leading to an over-provision of accommodation for older people.

The Council has proposed to select the preferred alternative. The key reasons are; it provides a stronger policy to ensure a sufficient quantity of the right type, tenure of older person accommodation is delivered to address local identified needs, as well as protect the existing stock. It ensures schemes are well designed, managed, staffed and located within access distance of local facilities/services (PTAL 3-6), so that occupants remain independent, healthy and are not socially isolated. The IIA assessment indicates the preferred alternative achieves a higher level of significant (i.e. housing, health) and minor positive effects against the IIA objectives, than the alternatives.



<p><b>Policy HO7 Supported and Sheltered Housing: Preferred</b></p>	<p><i>Outlines the approach for delivering specialist and sheltered accommodation to address the accommodation needs of vulnerable/disadvantaged individuals or groups and protect existing stock. It includes criteria to ensure proposals address identified local housing needs and are well designed and managed/staffed. Accommodation should also be located in accessible locations (PTAL 3+) with access to public transport and local facilities.</i></p>
<p><b>Policy HO7: Alternative 1</b></p>	<p><i>Continue existing Local Plan policy approach (DM 29).</i></p>

Policy HO7 Supported and Sheltered Housing makes provision for supported and sheltered housing across the Borough, including provision for the adaptation of existing dwellings. Alternative 1 consists of extant policy DM26: Sheltered housing. This is a highly permissive policy but does not perform as favourably as the preferred option against IIA3 (Accessibility) due to this alternative being open to interpretation and providing a weaker basis for ensuring development is accessible (through design and location).

The Council has proposed to select the preferred alternative. The key reasons are; it provides a stronger policy to ensure the right type of supported/sheltered accommodation is delivered to address local identified needs, as well as protect the existing stock. It ensures schemes are well designed, managed, staffed and located within access distance of local facilities/services to enable occupants to remain independent and healthy. The IIA assessment indicates the preferred alternative and alternatives achieves a similar level of scores against the IIA objectives. The difference is the preferred alternative scores a significant positive against IIA3 (Accessibility and Inequality).

<p><b>Policy HO8 Purpose Built Student Accommodation: Preferred</b></p>	<p><i>Outlines the approach for assessing proposals for Purpose Built Student Accommodation (PBSA). It includes criteria to ensure that proposals address identified local housing need and are well designed and managed/designed. Accommodation should also be located in the Opportunity Area, as well as provide affordable housing contributions. There should also not be an over-concentration of PBSAs in one area.</i></p>
<p><b>Policy HO8: Alternative 1</b></p>	<p><i>No policy.</i></p>
<p><b>Policy HO8: Alternative 2</b></p>	<p><i>Allow PBSA schemes within accessible locations with PTAL 3-6.</i></p>



Two reasonable alternatives to Policy HO8 Purpose Built Student Accommodation (PBSA) have been identified and assessed. The performance of the policy HO8 and the alternatives is very similar. No potential significant or uncertain effects are identified.

The Council has proposed to select the preferred alternative. The key reasons are; it provides a stronger policy to ensure PBSA proposals; promote good design, they are located within the most accessible locations to local facilities; do not result in an over concentration of such uses that may harm the character of an area and availability of family housing. In addition, it will ensure PBSA schemes do not have an adverse impact the delivery of priority housing needs like self-contained and affordable housing. The IIA assessment indicates that the preferred alternative and alternative 2 achieve relatively similar scores. The only differences are the preferred alternative achieves a minor positive score IIA4 health and alternative 2 achieves a minor negative against IIA7 air, light pollution.

<b><i>Policy HO9 Large Scale Purpose Built Shared Living (LSPBSL): Preferred</i></b>	<b><i>Outlines the approach for assessing proposals for large-scale purpose-built shared living (LSPBSL). It includes criteria to ensure that proposals address identified local housing need, are located within the opportunity area, as well as provides affordable housing contributions. There should also not be an over-concentration of LSPBSLs in one area.</i></b>
<b><i>Policy HO9: Alternative 1</i></b>	<b><i>No Policy.</i></b>
<b><i>Policy HO9: Alternative 2</i></b>	<b><i>Do not require applicants to demonstrate a need for LSPBSL.</i></b>
<b><i>Policy HO9: Alternative 3</i></b>	<b><i>Allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6.</i></b>
<b><i>Policy HO9: Alternative 4</i></b>	<b><i>Do not include distance test for assessing over concentration of LSPBSL.</i></b>

Four reasonable alternatives to Policy HO9 Purpose Built Shared Living have been identified and assessed. The policy HO9 and HO9 Alternative 2 both perform well relative to the other alternatives, with the least amount of negative or uncertain effects being identified. HO9 Alternative 1 which is for no policy option to be implemented, performs the worst with a number of potential minor negative effects being identified.

A number of uncertain effects were identified across the alternatives for IIA3 (Accessibility) for HO9 Alternative 4, IIA5 (Housing) for Alternatives 3 and 4, and IIA6 (Sustainable Travel) for HO9 Alternative 1.

The Council has proposed to select the preferred alternative. The key reasons are; it will provide a stronger policy approach to ensure LSPBSL schemes address a local identified need and ensure development does not result in an over concentration of such uses, which can have undermine the delivery of mixed and inclusive





communities. This will ensure LSPBSL developments do not compromise the delivery of conventional self-contained housing to address local needs, particularly affordable and family sized housing. The Opportunity Area is considered the most suitable and accessible location to accommodate LSPBSL schemes (i.e. 50 units), which tend to be built at a high density of four (or more) storeys on smaller sites, to ensure development viability. This approach will help minimise any potential adverse effects on the character areas of the Borough, particularly in suburban locations. The IIA assessment indicates that the preferred alternative achieves a higher level of positive effects against the IIA objectives, compared to the reasonable alternatives.

<b><i>Policy HO10 housing with shared facilities (Houses in Multiple Occupation): Preferred</i></b>	<b><i>Outlines the approach for assessing proposals for Houses in Multiple Occupation (HMO). It includes criteria to ensure that proposals address identified local housing need, do not lead to the loss of family housing, are located within accessible locations (PTAL 4+), as well as deliver well designed accommodation/ a satisfactory living environment. There should also not be an over-concentration of HMOs in one area.</i></b>
<b><i>Policy HO10: Alternative 1</i></b>	<b><i>Continue to apply existing policy (DM30).</i></b>
<b><i>Policy HO10: Alternative 2</i></b>	<b><i>Allow conversion of family houses to HMOs (i.e. no consideration of the houses internal floor area (130m<sup>2</sup>) and the character of the area).</i></b>
<b><i>Policy HO10: Alternative 3</i></b>	<b><i>Allow HMOS within accessible locations with a PTAL 3-6.</i></b>
<b><i>Policy HO10: Alternative 4</i></b>	<b><i>Do not include a specific measure to assess the over concentration of HMO's.</i></b>

Four reasonable alternatives to Policy HO10 Housing with shared facilities (Houses in Multiple Occupation) have been identified and assessed. The preferred policy HO10 performs the most positively of all of the policies/alternatives suggested for HO10. Only one potential significant negative effect is identified, which is for Alternative 2 in relation to IIA5 (Housing) due to the potential for family sized housing to be lost.

The Council has proposed to select the preferred alternative. The reasons are it provides a stronger policy basis to; protect the existing stock of family housing; direct HMO developments to locations with good access to local services/facilities (PTAL 4-6); ensure well designed HMO accommodation with satisfactory sized rooms and number of facilities; prevent the potential over concentration of HMO's. The IIA assessment indicates the preferred alternative achieve a higher level of positive effects against the II objectives, compared to the reasonable alternatives that achieve also achieve some negative effects



**Policy HO11: Self-build and Custom build housing** – no reasonable alternatives identified.

There is no alternative approach to the above policy, as this has been drafted to be consistent with national policy and in general conformity with the London Plan.

<p><b>Policy HO12 Gypsy and Traveller Accommodation Needs: Preferred</b></p>	<p><b><i>Outlines how the approach for addressing the need for gypsy and traveller accommodation. The updated policy aims to retain the existing site at Watling farm and deliver up to 12 additional pitches on this site to address future traveller needs. The policy will also support proposals for new sites and pitches providing that there is an identified need. It includes criteria to ensure that adequate provision of safe access, basic amenities and measures to minimise environmental impact is made on the site.</i></b></p>
<p><b>Policy HO12: Alternative 1</b></p>	<p><b>No policy.</b></p>
<p><b>Policy HO12: Alternative 2</b></p>	<p><b><i>Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015).</i></b></p>

Two reasonable alternatives to Policy HO12 Gypsy and Traveller Accommodation Needs have been identified and assessed. Alternative 1 (no policy) and Alternative 2 (include a policy with G&T need as set out in PPTS 2015) both perform poorly in comparison to policy, HO12 with potential significant negative effects being identified for IIA3 (Accessibility) and IIA5 (Housing) for Alternative 2, and IIA4 (Health and Wellbeing) for both alternatives due to poor access and resident exclusion. A number of uncertain effects are also identified for IIA3 (Accessibility) IIA6 (Sustainable Transport), IIA10 (Biodiversity and Geodiversity). Since the Draft Local Plan (reg 18) document was published (February 2024), the Council has received figures from a Draft GLA London Wide Gypsy and Travellers (G & T) Accommodation Needs assessment (GTANA). This indicates a provisional need to provide between 12 (PPTS G & T definition) and 13 (London Plan G & T Cultural definition) between 2022-32, but these figures may be subject to change when the final GTANA document is published. Therefore, the Council has proposed to select the preferred alternative option which is to provide 12 additional pitches on the existing Watlings Farm Site, based on the updated definition in the Planning Policy for Travellers (2023) that seeks to ensure Travellers are treated equally and fairly through planning process. The IIA assessment indicates that the preferred alternative and alternative 2 perform well, as the level of need identified by the two definitions is relatively similar. However, the preferred alternative achieves a higher level of positive effects against the IIA objectives than alternative 2.



## 6.2.5 Performance of Local Economy Alternatives

**Strategic Policy 04: Local Economy** – no reasonable alternatives identified.

**Strategic Policy 05: Harrow & Wealdstone Opportunity Area** – no reasonable alternatives identified.

There is no alternative approach to the above policies, as they have been drafted to be consistent with national policy and in general conformity with the London Plan.

<b><i>Policy LE1 Development Principles and Town Centre Hierarchy: Preferred</i></b>	<b><i>Outlines the council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.</i></b>
<b><i>Policy LE1: Alternative 1</i></b>	<b><i>Less restrictive policy.</i></b>

One reasonable alternative to Policy LE1 Development Principles and Town Centre Hierarchy has been identified and assessed. The reasonable alternative to Policy LE1 Development Principles and Town Centre Hierarchy performs similarly to policy LE1, however a potential minor positive effect for IIA1 (Economy) is identified instead of a potential significant positive effect, as the less restrictive alternative would not control or protect main centre uses, which may impact on the vitality and vibrancy of town centres.

The Council has proposed to select the preferred policy option. The key reasons for selecting the preferred option are; it will provide a stronger policy basis to ensure an appropriate mix of uses are maintained within the town centres and new uses/development does not have a detrimental impact on vitality and viability of town centres. Further, it recognises the introduction of E class uses limits the Councils ability to control uses within key areas of town centre (e.g. primary frontages) and it is more appropriate for policies to focus on outcomes. The IIA assessment indicates that the preferred and the alternative option achieve relatively similar scores against the IIA objectives. The only exception is that the preferred policy achieves a significant positive effect against IIA objective 1.

**Policy LE2: Night-time and Evening Economy** – no reasonable alternatives identified.

There is no alternative approach to the above policy, as this has been drafted to be consistent with national policy and in general conformity with the London Plan.

<b><i>Policy LE3 Industrial Land (Preferred at Regulation 18 stage)</i></b>	<b><i>Outlines the approach for assessing proposals to intensify, prevent the loss of and/or modernise floorspace and premises for industrial uses, within appropriate locations (Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs)).</i></b>
<b><i>Policy LE3: Alternative 1</i></b>	<b><i>Allow for the full range of appropriate industrial uses.</i></b>



<p><b>Policy LE3: Alternative 2</b> <b>(preferred at Regulation 19 stage)</b></p>	<p><i>Supports the co-location of non-industrial uses on industrial land (e.g. Residential uses on LSISs, as well as mixed use schemes on non-designated industrial land).</i></p>
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Two reasonable alternatives to Policy LE3 Industrial Land have been identified and assessed. LE3 Alternative 1 performs the same as policy LE3. One uncertain effect has been identified in relation to IIA1 (Economy) for LE3 Alternative 2. This alternative policy allows for the co-location of housing on Local Strategic Industrial Sites. It is uncertain what impact this may have on the economy as it is dependent on where the housing is located, the magnitude of impact this may have on industrial floorspace, and the types of industry impacted.

Following the Local Plan Regulation 18 consultation process, the Council has proposed to select the option to include co-location of residential uses (i.e. Alternative 2 Regulation 18) on LSISs through Plan-led or Masterplan as the preferred alternative. This will enable an increase in the scope to deliver additional housing to address local needs, whilst balancing this with the need to protect and maintain a sufficient supply of employment floor space. The preferred option at Regulation 19 scores a minor positive against IIA5 (Housing), whereas the other policy options score neutral for this objective. An uncertain score has been identified for IIA1 (Economy) for the preferred alternative as the impact co-location has on the economy is dependent on where housing is developed. It should be emphasised that the preferred policy would also be in conformity with the London Plan (2021).

**Policy LE4 Culture and Creative Industries** – no reasonable alternatives identified.

**Policy LE5 Tourism and Visitor Accommodation** – no reasonable alternatives identified.

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.

#### 6.2.6 Performance of Community Infrastructure Alternatives

**Strategic Policy 06: Social and Community Infrastructure** – no reasonable alternatives identified.

**Policy CI1: Safeguarding and Securing Social Infrastructure** – no reasonable alternatives identified.

**Policy CI2: Play and Informal Leisure** – no reasonable alternatives identified.

**Policy CI3: Sport and Recreation** – no reasonable alternatives identified.

**Policy CI4: Digital and Communications Infrastructure** – no reasonable alternatives identified.

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.



## 6.2.7 Performance of Green Infrastructure Alternatives

**Strategic Policy 07: Green Infrastructure** – no reasonable alternatives identified.

**Policy GI1: Green Belt and Metropolitan Open Land** – no reasonable alternatives identified.

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.

<b>Policy GI2 Open Space: Preferred</b>	<b><i>Outlines the approach to protect, enhance and increase the provision of open spaces. Further, it includes a strict criteria to assess proposals that may result in the potential loss of open space, recreational facilities and playing fields, in exceptional circumstances.</i></b>
<b>Policy GI2: Alternative 1</b>	<b><i>More restrictive policy (i.e. not allowing new community infrastructure on open spaces/recreational buildings in exceptional circumstances).</i></b>

One reasonable alternative to Policy GI2 Open Space has been identified and assessed. Policy GI2 Open Space performs well and could result in a number of minor positive effects. The reasonable alternative to Policy GI2 performs slightly better than policy G12, as the preferred policy identified uncertainty in relation to IIA10 (Biodiversity and Geodiversity). This outcome is due to the alternative policy being more restrictive than the preferred policy; this restriction removes the uncertainty identified in the preferred policy relating to potential harm to existing biodiversity as a result of the development of community infrastructure in exceptional circumstances. However, the preferred policy GI2 performs more positively with regards to community infrastructure provision.

The Council has proposed to select the preferred policy option and recognises that it is really important for the plan to protect, maintain, enhance the existing provision of open space provisions, particularly in areas where deficiencies may existing in the level of provision or access. This has positive effects on the health and wellbeing of communities, biodiversity and climate change resilience. Conversely, it recognises there may instances where applicants may need to demonstrate the potential loss of open space and recreational space/buildings, in exceptional circumstances; the delivery of new/enhanced community infrastructure. The IIA assessment indicates that both the preferred option and alternative 1 for this policy would generally result in similar effects, except for few a minor differences noted above.



<b>Policy Preferred</b>	<b>GI3 Biodiversity:</b>	<b>Including the requirement for 15% biodiversity net gain.</b>
<b>Policy GI3: Alternative 1</b>		<b>Align with the Environment Act (i.e. 10% Biodiversity Net Gain).</b>

One reasonable alternative to Policy GI3 Biodiversity has been identified and assessed. Policy G13 and alternative for Policy GI3 both perform well, with a potential significant positive effect being identified for IIA10 (Biodiversity and Geodiversity). The assessment notes that although both options will result in a significant positive result for IIA10 (Biodiversity and Geodiversity), Alternative 1 is unlikely to benefit biodiversity to the same extent as the policy G13 due to the requirement of a smaller biodiversity net gain for developments.

Through the Regulation 18, the Council has proposed to amend the Biodiversity Net Gain figure from 20% down to 15%. This would still exceed the nationally prescribed standard of 10% and therefore still would score well against relevant IIA objectives s. The Council has proposed to select the preferred policy option, to ensure the future development and change of the Borough proposals via the implementation of the Local Plan does not result in the degradation of and enhancement/increase in biodiversity, in line with the Environment Act 2021, as well as the Council’s Climate and Nature Strategy 2023-30. The Biodiversity evidence base shows that a Biodiversity Net Gain of 20% would be achievable for most developments without being too onerous or disproportionately impacting viability.

**Policy GI4: Urban Greening, Landscaping and Trees** – no reasonable alternatives identified.

There is no alternative approach to the above policy, as this has been drafted to be consistent with national policy and in general conformity with the London Plan.

**Policy GI5: Food Growing** – no reasonable alternatives identified.

There is no alternative approach to the above policy, as this has been drafted to be consistent with national policy and in general conformity with the London Plan.

### 6.2.8 Performance of Climate and Nature Policy Alternatives

**Strategic Policy 08: Responding to the Climate and Nature Emergency**– no reasonable alternatives identified.

There is no alternative approach to the above policy, as this has been drafted to be consistent with national policy and in general conformity with the London Plan.



<p><b>Policy CN1 Sustainable Design and Retrofitting: Preferred</b></p>	<p><b><i>Outlines that all new buildings should be designed and built to be net zero carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no gas connection, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings.</i></b></p>
<p><b>Policy CN1: Alternative 1</b></p>	<p><b><i>Development size threshold.</i></b></p>
<p><b>Policy CN1: Alternative 2</b></p>	<p><b><i>Approach to measuring zero carbon – Part L, Building Regulations.</i></b></p>

Two reasonable alternatives to Policy CN1 Sustainable Design and Retrofitting have been identified and assessed. Policy CN1 and alternatives all perform well however policy CN1 has a potential significant positive effect being identified in relation to IIA8 (Climate Change Contributions). The assessment of Policy CN1 Alternative 1 identified a potential significant negative effect in relation to IIA8 (Climate Change Contributions) because the alternative only focusses on major development proposals, however, i.e. those with greater than 10 units, or sites less than 0.25 hectares. The proportion of development coming forward on small sites within the Borough is likely to be quite significant given the nature of the Borough and the London Plan targets. This would likely undermine the intent for all buildings to meet net zero, and therefore would have a lesser effect on carbon reduction than Policy CN1. It would also mean that many buildings within the suburban area would not be required to achieve net zero design, which would be a missed opportunity to minimise carbon emissions and future proof the Borough’s buildings.

The Council has proposed to select the preferred policy option. The key reasons are; (1) Alternative 1: Threshold approach would only apply to major development proposals (i.e. 10 units +) . This would undermine the strategic intent of the policy for all buildings to meet Net zero and result in a large proportion of housing supply that is expected to comprise of small sites (i.e. below 0.25h under London Plan Policy H2) to not meet the net zero development requirement. Hence, the preferred approach ensures all building will be required to achieve net zero development, to minimise carbon emissions and future proof buildings. (2) Alternative 2 would be a continuation of apply London Plan and Part L of the building regulations to define and measure carbon/net zero. The weakness with this approach is that it is a narrow definition of net zero (i.e. 65% offset) and only considers regulated emissions (i.e excludes equipment/appliances). The key advantages of the preferred policy are it



will consider all energy uses in the building and seeks to achieve a balance between energy use and on-site renewable energy generation (i.e. zero carbon), only allowing offsetting to address a potential imbalance. This is more robust, as it sets absolute targets (i.e. absolute energy use) which can be checked and verified against actual (metered) energy usage in the occupied building after completion, compared to alternative 2. The IIA assessment indicates the preferred approach and alternative 2 have relatively similar scores against the IIA objectives except for the IIA objective 8: Climate change and mitigation that the preferred approach achieves a significant positive score against.

**Policy CN2: Energy Infrastructure** – no reasonable alternatives identified.

**Policy CN3: Reducing Flood Risk** – no reasonable alternatives identified.

**Policy CN4: Sustainable Drainage** – no reasonable alternatives identified.

**Policy CN5: Waterway Management** – no reasonable alternatives identified.

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.

### 6.2.9 Performance of Waste and Circular Economy Alternatives

**Strategic Policy 09: Managing Waste and Supporting the Circular Economy** – no reasonable alternatives identified.

**Policy CE1: Reducing and Managing Waste** – no reasonable alternatives identified.

**Policy CE2: Design to Support the Circular Economy** – no reasonable alternatives identified.

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.

### 6.2.10 Performance of Movement Policy Alternatives

**Strategic Policy 10: Movement** – no reasonable alternatives identified.

**Policy M1: Sustainable Transport** – no reasonable alternatives identified.

**Policy M2: Parking** – no reasonable alternatives identified.

**Policy M3: Deliveries, Servicing and Construction** – reasonable alternatives identified

There are no alternative approaches to the above policies, as these have been drafted to be consistent with national policy and in general conformity with the London Plan.

## 6.3 Site Options

### 6.3.1 Site Identification and Initial Site Eligibility Sifting

Sites were identified from:





- A call for sites during Regulation 18 consultation, and an earlier informal call for sites, with all submitted sites considered for allocation in the following steps;
- A review of existing allocations;
- Major Council development, regeneration and estate renewal programs; and
- A review of strategically located retail sites with large car parks.

A total of 98 sites were identified. Of these 98 sites, 36 were excluded from further consideration if they had been delivered or were expected to be delivered by the commencement of the Plan.

Sites were only considered if they had an area of at least 0.25ha or were proposing to deliver at least 10 housing units or 500sqm of additional employment floorspace. Of the remaining 62 sites identified, 10 sites did not meet these criteria, and were not considered to be sufficiently large, so did not merit site allocation.

### **6.3.2 Site Suitability Assessment**

A full assessment of site suitability was carried out, establishing:

- Whether development on each site would comply with the London Plan and the spatial strategy and strategic policies of the draft Local Plan;
- The accessibility of each site (including to public transport, centres and a range of social infrastructure);
- Potential environmental and heritage impacts of development on each site; and
- Flood designations of each site.

All of the factors listed above were considered in order to obtain a full picture of site suitability. This resulted in the following criteria which were used to exclude sites for consideration as potential allocations (although additional criteria would have been used if sites had significant flood affectation or other constraints, larger impacts or significant contraventions of other policies):

- Sites in the Green Belt or Metropolitan Open Land, as development would be inconsistent with the London Plan and Council's draft Local Plan. In addition, Harrow's housing requirement- as set in the London Plan (and carried forward for the full plan period)- is capable of being met through proposed allocations, the development pipeline (under construction or with planning permission) and a windfall allowance. Therefore, exceptional circumstances, as outlined in the NPPF (December 2023), were considered not to exist to justify allocation of these sites, and subsequently development on Green Belt land, in accordance with London Plan Policy G2 Green Belt and Policy GG2 Making Best Use of Land;
- Sites which are Designated Open Space, as development of these sites would be contrary to the London Plan Policy G4 Open Space and Council's draft Local Plan and has the potential to decrease access to open space in the Borough; and
- Sites with industrial land designations or in industrial use if they are not on the edge of a designated employment area or a stand-alone site, and if development would not deliver improved or better functioning employment space.



Of the remaining 52 sites identified, 11 were excluded as they contravene draft Local Plan policies which have been tested against reasonable alternatives during the local plan process and through integrated impact assessment (IIA).

Following this process, adjacent sites were amalgamated into a single proposed allocation and additional adjoining parcels added in cases where site amalgamation (or failing that a consolidated design approach) would better optimize overall site outcomes and capacity or would lead to development proceeding in a more rational way.

### **6.3.3 Detailed Assessment**

A full assessment of site availability and deliverability was carried out on the remaining 41 sites identified, considering factors such as land ownership, planning applications, site marketing and landowner intentions. Existing unimplemented allocations which were considered to be very unlikely to become available for development over the plan period were excluded. All other sites were considered to be sufficiently likely to become available for development, and delivery timescales were estimated.

Indicative residential capacities for each site were established using a hierarchy of approaches:

- The permitted quantum of housing on relevant sites where existing schemes are permitted and likely to be delivered on that basis;
- An uplift on sites with planning permission where reworking of existing schemes is likely to occur based on stated landowner intentions; and
- A design-based capacity study establishing potential building massing on other sites in line with London Plan policies D1, D2 and D3.

For sites where design-led capacities have been used, a further uplift of 10% has been applied to resulting residential capacities. This is intended to reflect the outcome of development management processes which typically result in an uplift from expected site capacities through negotiation and further optimization of site capacities by proponents as part of a detailed design process.

Further assessments of sites proposed to be allocated were carried out through local plan evidence studies, including:

- Screening and assessment in the Level 2 Strategic Flood Risk Assessment;
- Identification of any infrastructure opportunities / needs, or constraints in the Infrastructure Delivery Plan; and
- Consideration of site viability through the Local Plan Viability Study.

No further sites needed to be excluded because of these evidence base studies, but where relevant the results were reflected in the content of site allocations. Site Allocations will be included in Policy GR12 and details of allocations will be provided within Chapter 11 of the draft Local Plan.

A total of 41 reasonable alternative sites have therefore been identified through the site selection process and have been subject to IIA. 23 of the proposed 41 sites are existing allocations in the current Local Plan, seven of which are large sites with phased development ongoing.



Detailed assessment spreadsheets for all identified reasonable alternative site options can found in Appendix F of the main IIA report. All of the 41 reasonable alternative sites have been included within the draft Local Plan as allocations.



## 7.0 Assessment of the Draft Local Plan Policies

### 7.1 Introduction

The summary tables in this section present the sustainability performance of the policies of the draft Local Plan which contains the preferred policies. The policies are arranged within the following chapters and this section uses the same structure:

- Spatial Vision;
- High Quality Growth;
- Heritage;
- Housing;
- Local Economy;
- Community Infrastructure;
- Green Infrastructure;
- Climate and Nature;
- Waste and Circular Economy; and
- Movement.

Local Plan preferred policies that have been majorly amended following Regulation 18 consultation have been re-assessed against the IIA Framework. These include:

- Strategic Policy 01: High Quality Growth;
- Policy GR1: Delivering High Quality Design;
- Policy GR3: Public Realm and Connecting Places;
- Policy GR4: Building Heights;
- Policy GR5: View Management;
- Policy GR7: External Lighting;
- Policy GR8: Shopfronts & Forecourts;
- Policy GR10: Infill and Backland Sites, Back Gardens and Amenity Areas;
- Policy GR11: Planning Obligations;
- Strategic Policy 02: Heritage;
- Policy HE1: Historic Environment;
- Strategic Policy 03: Meeting Harrow's Housing Needs;
- Policy HO1: Dwelling Size Mix;
- Policy HO4: Genuinely Affordable Housing;
- Policy HO6: Accommodation for Older People;
- Policy HO9: Large Scale Purpose Built Shared Living;
- Policy HO12: Gypsy and Traveller Accommodation;



- Strategic Policy 05: Harrow & Wealdstone Opportunity Area;
- Policy LE1: Development Principles & Town Centre Hierarchy;
- Policy LE2: Night-time and Evening Economy;
- Policy LE3: Industrial Land;
- Policy CI3: Sport and Recreation;
- Strategic Policy 07: Green Infrastructure;
- Policy GI4: Urban Greening, Landscaping and Trees;
- Policy CN1: Sustainable Design & Retrofitting;
- Policy CN4: Sustainable Drainage;
- Strategic Policy 09: Managing Waste and Supporting the Circular Economy;
- Policy M2: Parking; and
- Policy M3: Deliveries, Servicing and Construction.

As a result of re-assessment, the following policies were amended:

- Policy GR3: Public Realm and Connecting Places (IIA10 amended from neutral to minor positive);
- Policy HE1: Historic Environment (IIA8 and IIA9 amended from neutral to minor positive);
- Policy HO6: Accommodation for Older People (IIA3 amended from minor positive to significant positive); and
- Strategic Policy 07: Green Infrastructure (IIA11 amended from neutral to minor positive).

Four new policies have also been assessed:

- Policy GR3A: Inclusive Design;
- Policy GR3B: Safety, Security and Resilience to Hazards;
- Policy GR4A: Basement Development; and
- Policy GR12: Site Allocations.

For each group of policies, a summary table is presented which contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is shown in **Error! Reference source not found.** The policies assessed are listed in the left-hand column of each summary table. A discussion of the performance of the policies within each chapter is provided under each summary table.



**Table 7-1: Key to Sustainability Significance Scores**

Potential Sustainability Effect	Symbol
Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	---



## 7.2 Performance of the Spatial Strategy Policy

The Spatial Vision chapter includes one Spatial Strategy policy, as shown in the summary table below.

**Table 7-2: Summary of Spatial Strategy Policy Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Spatial Strategy	++	+	+	+	++	++	+	+	0	+	+	+	+	0

The Spatial Strategy policy generally performs well, with potential significant positive effects being identified in relation to IIA1 (Economy), IIA5 (Housing) and IIA6 (Sustainable Travel).



### 7.3 Performance of High Quality Growth Policies

The High Quality Growth chapter includes twelve preferred policies, as shown in the summary table below.

**Table 7-3: Summary of High Quality Growth Policy Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 01: High Quality Growth	++	0	++	+	0	+	0	0	0	0	+	++	0	0
GR1 Achieving a High Standard of Development	0	0	+	+	0	0	++	+	+	+	+	+	+	+
GR2 Inclusive Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0
GR3 Public Realm and Connecting Places	0	0	+	+	0	+	+	+	+	+	+	+	0	0
GR3A Inclusive Design	0	0	++	+	+	+	0	0	0	0	+	0	0	0
GR3B Safety, Security and Resilience to Hazards	0	0	0	+	0	0	0	0	0	0	0	0	0	0
GR4 Building Heights	+	0	0	+	+	0	+	0	0	0	+	++	0	0





Policy	IIA Objective													
GR4A Basement Development	0	0	0	+	+	0	0	0	+	+	0	0	+	0
GR5 View Management	0	0	+	0	0	0	0	0	0	0	+	++	0	0
GR6 Areas of Special Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
GR7 External Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0
GR8 Shopfronts and Forecourts	+	0	+	+	0	0	0	0	0	0	+	+	0	0
GR9 Outdoor Advertisement, Digital Display and Hoardings	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10 Infill and Backland Sites, Back Gardens and Amenity Areas	0	0	+	+	+	+	0	0	0	+	0	+	0	+
GR11 Planning Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0
GR12 Site Allocations	0	0	+	0	++	+	0	0	0	0	0	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects identified in relation to IIA1 (Economy) for Strategic Policy 01: High Quality Growth, IIA3 (Accessibility) for Strategic Policy 01: High Quality Growth and GR3A Inclusive Design, IIA5 (Housing) for GR12 Site Allocations, IIA7 (Air, Light and Noise Pollution) for Policy GR1 Achieving a High Standard of Development and Policy GR9 Outdoor Advertisement, Digital Display and Hoardings, and IIA12 (Landscape and Townscape) for Strategic Policy 01: High Quality Growth, Policy GR4 Building Heights and Policy GR5 View Management.



## 7.4 Performance of Heritage Policies

The Heritage chapter includes three preferred policies, shown in the summary table below.

**Table 7-4: Summary of Heritage Policies Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 02: Harrow Heritage Assets	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1 Heritage Assets	+	0	0	0	0	0	0	0	0	+	++	++	0	0
HE2 Enabling Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA11 (Historic Environment) for Strategic Policy 02 Harrow Heritage Assets and Policy HE1 Heritage Assets, and IIA12 (Landscape and Townscape) for Policy HE1 Heritage Assets.

## 7.5 Performance of Housing Policies

The Housing Policies chapter includes thirteen preferred policies, shown in the summary table below.



**Table 7-5: Summary of Housing Policy Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 03: Meeting Harrow's Housing Needs	+	0	+	+	++	+	-	0	0	0	0	-	+	0
HO1 Dwelling Size Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
HO2 Conversion and Redevelopment of Larger Dwellings	0	0	+	+	++	+	+	+	0	0	+	+	+	+
Policy HO3 Optimising the Use of Small Housing Sites	0	0	+	+	+	+	0	+	0	+	0	+	0	0
Policy HO4 Genuinely Affordable Housing	0	+	0	0	++	0	0	0	0	0	0	0	+	0
Policy HO5 Housing Estate Renewal and Regeneration	0	0	0	++	++	++	0	+	0	0	0	+	+	0



Policy	IIA Objective													
Policy HO6 Accommodation for Older People	0	0	++	+	++	+	0	+	0	0	0	0	0	0
Policy HO7 Supported and Sheltered Housing	0	0	++	+	+	+	0	0	0	0	0	0	+	0
Policy HO8 Purpose Built Student Accommodation	+	0	+	+	+	+	0	0	0	0	0	0	0	0
HO9 Large Scale Purpose Built Shared Living	+	+	+	+	+	+	0	+	0	0	0	+	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation)	0	0	+	+	++	+	0	+	+	+	0	+	0	+
HO11 Self-build and Custom- build Housing	0	0	+	0	+	0	0	0	0	0	0	0	0	0
HO12 Gypsy and Traveller Accommodation Needs	0	0	+	+	+	+	0	0	+	+	0	+	+	+

Generally, the housing policies have performed well, particularly against IIA objectives relating to Accessibility (IIA3), Health and Wellbeing (IIA4), Housing (IIA5) and Sustainable Travel (IIA6). This is due to the chapter containing policies which set out the need for housing which will meet the needs of the Borough to predominantly be located within the Harrow and Wealdstone Opportunity Area, followed by locations within or nearby town centres, public transport hubs and highly accessible locations with a PTAL score 3-6.



## 7.6 Performance of Local Economy Policies

The Local Economy chapter includes seven preferred policies, as shown in the summary table below. Three alternatives to the preferred policies have also been assessed.

**Table 7-6: Summary of Local Economy Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 04: Local Economy	++	++	0	0	?	0	0	0	0	0	0	0	0	0
Strategic Policy 05: Harrow & Wealdstone Opportunity Area	++	+	+	+	+	++	0	+	+	+	+	+	0	0
LE1 Development Principles and Town Centre Hierarchy	++	+	+	+	0	+	+	0	0	0	0	+	0	+
LE2 Night-time and Evening Economy	++	+	+	0	0	0	+	0	0	0	0	0	0	0
LE3 Industrial Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+



Policy	IIA Objective													
LE4 Culture and Creative Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5 Tourism and Visitor Accommodation	++	+	+	+	+	+	+	0	0	0	+	+	0	+

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA1 (Economy) for five of the policies. Potential significant positive effects have also been identified in relation to IIA2 (Employment) for Strategic Policy 04: Local Economy, and IIA6 (Sustainable Travel) for Strategic Policy 05: Harrow & Wealdstone Opportunity Area. An uncertain effect has been identified in relation to IIA5 for Strategic Policy 04: Local Economy because it is not clear how many homes will be provided by mixed use development schemes.

### 7.7 Performance of Community Infrastructure Policies

The Community Infrastructure chapter includes five preferred policies, as shown in the summary table below.

**Table 7-7: Summary of Community Infrastructure Policies Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 06: Social and Community Infrastructure	+	+	+	+	0	0	0	0	+	+	0	0	0	0
CI1 Safeguarding	+	+	+	++	0	+	+	0	0	0	0	0	0	+



Policy	IIA Objective													
and Securing Social Infrastructure														
CI2 Play and Informal Recreation	0	0	+	++	0	0	0	0	+	+	0	0	0	0
CI3 Sport and Recreation	+	+	+	++	0	+	+	0	0	+	+	+	+	0
CI4 Digital and Communications Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA4 for CI1 Safeguarding and Securing Social Infrastructure, CI2 Play and Informal Recreation, and CI3 Sport and Recreation.

### 7.8 Performance of Green Infrastructure Policies

The Green Infrastructure chapter includes six preferred policies, as shown in the summary table below.

**Table 7-8: Summary of Green Infrastructure Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 07:	0	0	0	+	0	0	+	0	+	+	+	+	+	0



Policy	IIA Objective													
Green Infrastructure														
GI1 Green Belt and Metropolitan Open Land	0	0	0	+	0	0	0	0	0	+	+	+	+	0
GI2 Open Space	0	0	+	+	0	0	0	0	+	+	0	0	0	0
GI3 Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
GI4 Urban Greening, Landscaping and Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
GI5 Food Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0

The policies within the Green Infrastructure chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA10 (Biodiversity and Geodiversity) for GI3 Biodiversity and GI4 Urban Greening, Landscaping and Trees.

### 7.9 Performance of Climate and Nature Policies

The Climate and Nature chapter includes six preferred policies, as shown in the summary table below.





**Table 7-9: Summary of Climate and Nature Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 08: Responding to the Climate and Nature Emergency	0	+	0	+	0	++	+	++	+	+	0	0	+	+
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
CN2 Energy Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0
CN3 Reducing Flood Risk	+	0	0	+	0	0	0	0	++	+	0	0	+	0
CN4 Sustainable Drainage	+	0	0	+	0	0	0	0	++	+	0	0	++	0
CN5 Waterway Management	0	+	0	0	0	0	0	0	+	+	0	0	+	0

The policies within the Climate and Nature chapter generally perform well against the IIA objectives, with potential significant positive effects identified in relation to IIA6 (Sustainable Travel), IIA8 (Climate Change Contributions), IIA9 (Climate Change Adaptation) and (IIA13 Soil and Water).



## 7.10 Performance of Waste and Circular Economy Policies

The Waste and Circular Economy chapter includes three preferred policies, as shown in the summary table below.

**Table 7-10: Summary of Waste and Circular Economy Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 09: Managing Waste and Supporting the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1 Reducing and Managing Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++
CE2 Design to Support the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	0	0	++

The policies within the waste chapter generally perform well against the IIA objectives, although most potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. As would be expected, all three of the policies should result in potential significant positive effects with regards to IIA14 (Waste).



## 7.11 Performance of Movement Policies

The Movement chapter includes four preferred policies, as shown in the summary table below.

**Table 7-11: Summary of Movement Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contributions	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 10: Movement	+	0	+	+	0	++	+	+	0	0	0	0	0	0
M1 Sustainable Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2 Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0
M3 Deliveries, Servicing and Construction	0	0	0	+	0	+	+	+	0	0	0	0	0	0

All of the policies within this chapter of the Local Plan generally perform well, although many potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. Potential significant positive effects have been identified in relation to IIA6 (Sustainable Travel) for Strategic Policy 10: Movement, Policy M1 Sustainable Transport, and Policy M2 Parking.



## 8.0 Assessment of Site Options

The summary table in this section presents the sustainability performance of the site options of the draft Local Plan.

The summary table contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is the same as that shown in **Error! Reference source not found.**. The sites assessed are listed in the left-hand column of the summary table.

**Table 8-1: Summary of Site Options Assessment**

Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contribution	Climate Change Adaptation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Site OA1- Queen's House Carpark	++	++	++	+	++	++	0	++	+	+	+	0	+	0
Site OA2- Harrow on the Hill	++	++	++	+	++	++	0	++	+	+	-	0	+	0
Site OA3- 15-29 College Road	?	?	++	?	+	++	0	+	+	+	-	0	+	0
Site OA4- Havelock Place	?	?	++	+	++	++	0	+	+	0	-	0	+	0
Site OA5- Station Road East, Harrow	++	++	++	+	++	++	0	++	+	0	-	0	+	0



Site	IIA Objective														
Site OA6- Greenhill Way	++	++	++	++	++	++	0	++	+	+	-	0	0	0	
Site OA7- Tesco Station Road	++	++	+	+	++	+	0	++	+	0	-	0	0	0	
Site OA8- Former Royal Mail Sorting Office, Elmgrove Road	+	+	+	+	+	+	0	+	+	+	+	+	0	0	
Site OA9 - Poet's Corner & Milton Road	?	?	+	+	++	+	0	+	+	+	+	0	0	0	
Site OA10- Wealdstone Parole Office	?	?	+	+	+	+	0	+	+	+	-	0	0	0	
Site OA11- Carpark Ellen Webb Drive	++	++	++	+	++	++	0	+	+	+	+	0	0	0	
Site OA12- Peel Road	+	+	++	+	++	++	0	++	+	+	-	0	0	0	
Site OA13- Travis Perkins Wealdstone	?	?	++	+	+	++	0	+	-	+	+	+	0	0	
Site OA14- Byron Quarter	++	++	+	++	++	+	0	++	+	0	+	0	-	0	
Site OA15- Iceland Wealdstone	+	+	+	+	+	+	0	+	+	+	-	0	0	0	
Site OA16- Kodak	++	++	+	+	++	+	0	-	+	0	-	0	0	0	



Site	IIA Objective													
Site OA17- Former Kodak Administration Offices	++	++	+	+	++	+	0	-	+	0	+	0	0	0
Site GB1- Royal National Orthopaedic Hospital	++	++	--	+	++	--	0	-	+	0	-	--	--	0
Site GB2- Watling Farm	0	-	--	-	++	--	0	-	+	0	+	--	--	0
Site O1- Waitrose South Harrow	++	++	+	+	++	+	0	++	+	+	+	+	0	0
Site O2- Roxeth Library & Clinic	+	+	++	+	+	++	0	+	+	+	+	+	+	0
Site O3- Northolt Road Nursery and Carpark at rear of 27 Northolt Road	+	+	++	+	+	++	0	+	+	+	-	+	+	0
Site O4- Grange Farm	+	+	+	+	++	+	0	+	+	0	-	+	-	0
Site O5- Harrow School Estate & John Lyon School	+	0	0	+	0	+	0	+	+	0	-	--	+	0
Site O6- Brethrens Meeting Hall, The Ridgeway	0	0	0	+	0	0	0	-	+	0	+	+	+	0



Site	IIA Objective													
Site O7- Rayners Lane Station Carpark	+	+	+	+	+	+	0	++	+	0	-	+	0	0
Site O8- Harrow West Conservative Association	?	?	+	+	+	+	0	-	+	+	+	+	0	0
Site O9- Pinner Telephone Exchange	0	0	+	+	+	-	0	-	-	0	+	+	0	0
Site O10- Harrow View Telephone Exchange	+	+	+	+	+	--	0	+	+	+	+	0	+	0
Site O11- North Harrow Methodist Church	?	?	+	+	+	+	0	-	+	0	+	+	0	0
Site O12- Hatch End Telephone Exchange	?	?	+	+	+	+	0	+	+	+	+	+	0	0
Site O13- Harrow Arts Centre	+	0	0	+	0	+	0	+	+	0	-	+	-	0
Site O14- Vernon Lodge	0	0	0	0	+	-	0	-	+	0	+	0	+	0
Site O15- Belmont Clinic	+	+	0	+	?	-	0	-	+	0	+	0	-	0
Site O16- Travellers	++	+	++	+	++	++	0	+	+	+	+	0	0	0



Site	IIA Objective													
Rest, Kenton Road														
Site O17- Kenton Rd Telephone Exchange	+	+	+	+	+	+	0	-	-	+	+	0	0	0
Site O18- Wolstenholme	0	0	0	+	+	-	0	-	+	0	-	0	-	0
Site O19- Marsh Lane Gas Holders	-	+	+	+	+	+	0	-	+	0	+	0	-	0
Site O20- Canons Park Station Carpark	-	+	+	+	+	+	0	-	+	0	-	+	0	0
Site O21- Anmer Lodge	++	+	+	+	++	+	0	+	+	0	+	0	-	0
Site O22- Stanmore Station Carpark	+	-	+	+	++	+	0	+	+	0	-	+	+	0





## 8.1 Performance of Site Options

### 8.1.1 IIA1 Economy

Potential significant positive effects have been identified for the following sites:

- Queen's House Carpark;
- Harrow on the Hill;
- Station Road East;
- Greenhill Way;
- Tesco Station Road;
- Carpark Ellen Web Drive;
- Byron Quarter;
- Kodak;
- Former Kodak Offices;
- Royal National Orthopaedic Hospital;
- Waitrose South Harrow;
- Travellers Rest Kenton Road; and
- Anmer Lodge.

Potential significant positive effects have been identified for these sites as they are located within or near to town/district centres and provide some form of additional facility (e.g. retail/town centre uses, employment space) that could contribute positively to the local economy.

No potential significant negative effects have been identified in relation to IIA1 (Economy).

Uncertain effects have been identified for Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association as it is unclear whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites, making it difficult to determine the significance of the potential effect.

Uncertain effects have been identified for Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road as it is unclear whether the development of these sites will lead to the loss of existing employment space.

### 8.1.2 IIA2 Employment

Potential significant positive effects have been identified in relation to IIA2 (Employment) for the following sites:

- Queen's House Carpark;
- Harrow on the Hill;
- Station Road East;
- Greenhill Way;
- Tesco Station Road;
- Carpark Ellen Web Drive;
- Byron Quarter;



- Kodak;
- Former Kodak Offices;
- Royal National Orthopaedic Hospital; and
- Waitrose South Harrow.

Potential significant positive effects have been identified for these sites as they are located in close proximity to an existing employment site, and they also provide some form of additional facility (e.g. retail/town centre uses, employment space) which could create further employment opportunities.

No potential significant negative effects have been identified in relation to IIA2 (Employment).

Uncertain effects have been identified for Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association sites as it is unclear whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites, making it difficult to determine the significance of the potential effect.

Uncertain effects have been identified for Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road as it is unclear whether the development of these sites will lead to the loss of existing employment space and, potentially, also jobs.

### **8.1.3 IIA3 Accessibility and Inequalities**

Potential significant positive effects have been identified for the following sites:

- Queen's House Carpark;
- Harrow on the Hill;
- 15-29 College Road;
- Havelock Place;
- Station Road East;
- Greenhill Way;
- Carpark Ellen Web Drive;
- Peel Road;
- Travis Perkins Wealdstone;
- Roxeth Library & Clinic;
- Northolt Road Nursery and Carpark at rear of 27 Northolt Road; and.
- Travellers Rest Kenton Road.

Potential significant positive effects have been identified for these sites as they are in close walking distance to local facilities and services, suggesting good accessibility via public transport. These sites are also expected to provide further facilities and services (e.g. retail or community uses) on site.

Potential significant negative effects have been identified for Royal National Orthopaedic Hospital and Watling Farm as these sites were assessed as not being in close walking distance to a number of local facilities and services, as well as holding a PTAL score of 1, suggesting significant issues with accessibility to public transport.



They also did not make on site provision for further facilities and services (e.g. retail or community uses).

No uncertain effects have been identified in relation to IIA3 (Accessibility and Inequalities).

#### **8.1.4 IIA4 Health**

Potential significant positive effects have been identified in relation to IIA4 (Health) for the following sites:

- Greenhill Way; and
- Byron Quarter.

Potential significant positive effects have been identified for these sites as they are in close walking distance to health and wellbeing facilities, as well as provide additional services/facilities relating to health and wellbeing.

No potential significant negative effects have been identified in relation to IIA4 (Health).

An uncertain effect has been identified for 15-29 College Road as it is unclear whether the loss of a church as a result of development has been proven as a facility deemed no longer necessary by LBHC, or if this infrastructure would be provided elsewhere. This subsequently makes it difficult to determine the significance of the potential effect.

#### **8.1.5 IIA5 Housing**

Potential significant positive effects have been identified for all sites that provide over 100 homes. No potential significant negative effects have been identified in relation to IIA5 (Housing). An uncertain effect has been identified for Belmont Clinic as it is unclear whether housing will be delivered on the site.

#### **8.1.6 IIA6 Sustainable Travel**

Potential significant positive effects have been identified for the following sites:

- Queen's House Carpark;
- Harrow on the Hill;
- 15-29 College Road;
- Havelock Place;
- Station Road East;
- Greenhill Way;
- Carpark Ellen Web Drive;
- Peel Road;
- Travis Perkins Wealdstone;
- Roxeth Library & Clinic;
- Northolt Road Nursery and Carpark at rear of 27 Northolt Road; and
- Travellers Rest Kenton Road.

Potential significant positive effects have been identified for these sites as they are in close walking distance to local facilities and services, as well as holding a PTAL score of either 5 or 6, suggesting good accessibility via public transport.



Potential significant negative effects have been identified for the following sites:

- Royal National Orthopaedic Hospital;
- Watling Farm; and
- Harrow View Telephone Exchange.

Potential significant negative effects have been identified for these sites as they do not have good walking distance to a number of local facilities and services, and have a PTAL score of 1 or 2, suggesting significant issues with accessibility to public transport.

No uncertain effects have been identified in relation to IIA6 (Sustainable Travel).

### **8.1.7 IIA7 Air, Light and Noise Pollution**

No potential significant or uncertain effects have been identified in relation to IIA7 (Air, Light and Noise Pollution).

### **8.1.8 IIA8 Climate Change Contributions**

Potential significant positive effects have been identified for the following sites:

- Queen's House Carpark;
- Harrow on the Hill;
- Station Road East;
- Greenhill Way;
- Tesco Station Road;
- Peel Road;
- Byron Quarter;
- Waitrose South Harrow; and
- Rayners Lane Station Car Park.

Potential significant positive effects have been identified for these sites as they have an existing EV charger within 600m of the site and they make provision for electric vehicle charging on site, in line with Local Plan Policy CN2: Energy Infrastructure.

No potential significant negative or uncertain effects have been identified in relation to IIA8 (Climate Change Adaptation).

### **8.1.9 IIA9 Climate Change Adaptation**

No potential significant or uncertain effects have been identified in relation to IIA9 (Climate Change Adaptation).

### **8.1.10 IIA10 Biodiversity and Geodiversity**

No potential significant or uncertain effects have been identified in relation to IIA10 (Biodiversity and Geodiversity).



### **8.1.11 IIA11 Historic Environment**

No potential significant or uncertain effects have been in relation to IIA11 (Historic Environment).

### **8.1.12 IIA12 Landscape and Townscape**

No potential significant positive or uncertain effects have been identified in relation to IIA12 (Landscape and Townscape).

Potential significant negative effects have been identified in relation to IIA12 (Landscape and Townscape) for Royal National Orthopaedic Hospital, Watling Farm and Harrow School Estate & John Lyon School as the sites are either classified as 'Green Belt' or 'Metropolitan Open Land'. The development of these sites would be contrary to the purposes of these land designations which include maintaining openness, preventing urban sprawl and encouraging urban regeneration.

### **8.1.13 IIA13 Water and Soil**

No potential significant positive or uncertain effects have been identified in relation to IIA13 (Water and Soil).

Potential significant negative effects have been identified in relation to IIA13 (Water and Soil) identified for Royal National Orthopaedic Hospital and Watling Farm as the sites are either fully or partially greenfield land and Grade 3 agricultural land (classified as best and most versatile); development would subsequently lead to the permanent and irreversible loss of these land types. The sites also contain or lie in close proximity to a number of historic landfills, which suggests that the land is at risk of contamination which would require further investigation.

### **8.1.14 IIA14 Waste**

No potential significant or uncertain effects have been identified in relation to IIA14 (Waste).



## 9.0 Equalities Impact Assessment

This section summarises the Equalities Impact Assessment (EqIA), which has been integrated within the IIA.

The Equality Act 2010 imposes a duty on public bodies that shape policy, deliver service and/or employ people. The duty requires public bodies to:

- have due regard to the need to eliminate discrimination;
- advance equality of opportunity; and
- foster good relations between different people when carrying out their activities.

EqIA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a proposed plan, policy, or project for people sharing one or more protected characteristics. EqIA itself is not a legal requirement and formal guidance on the approach is not available. However, it is a recognised method commonly employed to demonstrate compliance with the Equality Act.

Within the IIA specific parts of the following objectives are relevant to the EqIA: IIA1, IIA2, IIA3, IIA4, IIA5, IIA6 and IIA7. Table 9-1 summarises the potential significant positive effects the Local Plan policies and site options may create, relating to EqIA. No potential significant negative or uncertain effects have been identified in relation to equalities for Local Plan policies and site options.



**Table 9-1: EqIA Related Potential Significant Positive Effects**

Identified Effect and Protected Characteristics Impact	Description	Relevant Policies and Sites
<p>Employment Opportunities (Protected characteristics: disability, race and religion or belief)</p>	<p>Providing equitable access to jobs that provide decent living incomes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups. The diversification and growth of Harrow’s business could result in the provision of more skilled jobs that include training and qualification opportunities for its employees.</p> <p>This would create a resilient local economy and a variety of employment opportunities. This would benefit younger and working-age people as well as those of a low socio-economic status.</p>	<ul style="list-style-type: none"> <li>• Strategic Policy 05: Harrow &amp; Wealdstone Opportunity Area.</li> <li>• Tesco Station Road; Carpark Ellen Webb Drive; Queens House Carpark; Harrow on the Hill; Byron Quarter; Royal National Orthopaedic Hospital; Station Road East, Harrow; Former Kodak Offices; Kodak; Greenhill Way; and Waitrose South Harrow are all located in close proximity to an existing employment site, and also provide some form of additional facility (e.g. retail/town centre uses, employment space) which could create further employment opportunities.</li> </ul>
<p>Improving access to community infrastructure (Protected characteristics: disability, age and pregnancy)</p>	<p>Improving access to social and community infrastructure would increase access to education/schools facilities, as well as other public spaces available for community use, and ensure everyone has equal access to public and/or private recreational space.</p> <p>Improving access to healthcare will positively affect individuals who are relatively prone to health problems and/or require frequent health care, such as those with disabilities, the elderly, and pregnant people.</p>	<ul style="list-style-type: none"> <li>• CI1: Safeguarding and Securing Social Infrastructure</li> <li>• CI2 Play and Informal Recreation</li> <li>• CI3 Sport and Recreation</li> <li>• Brethrens Meeting Hall, The Ridgeway will support the development of a SEND school.</li> <li>• Harrow Arts Centre will support the expansion and modernisation of the arts centre.</li> </ul>



Identified Effect and Protected Characteristics Impact	Description	Relevant Policies and Sites
		<ul style="list-style-type: none"> <li>• Royal National Orthopaedic Hospital will support the redevelopment/ expansion of the existing hospital.</li> <li>• Greenhill Way, Poets Corner &amp; Milton Road, Byron Quarter, Roxeth Library &amp; Clinic and Waitrose South Harrow may support the provision of NHS floorspace.</li> <li>• Belmont Clinic will support the redevelopment/ expansion of the existing medical centre.</li> </ul>
Accessibility (Protected characteristics: all)	<p>Ensuring design is inclusive would increase access and safety for women, children, the disabled and the elderly. All new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances. Safe and accessible developments should specifically these protected characteristics. This includes the provision of tenure neutral residential buildings, and the provision of accessible public toilets in commercial and public buildings. This will ensure that all new development will be built to avoid any adverse/ discriminatory impact on protected characteristics/equality groups.</p>	<ul style="list-style-type: none"> <li>• GR3A Inclusive Design</li> </ul>
Development in suitable locations	<p>Housing should be located in close proximity to shops, services, facilities and public transport to allow future</p>	<ul style="list-style-type: none"> <li>• HO7 Supported and Sheltered Housing</li> </ul>





Identified Effect and Protected Characteristics Impact	Description	Relevant Policies and Sites
(Protected characteristics: disability)	residents, especially those with disabilities, to live comfortably within the Borough.	<ul style="list-style-type: none"> <li>Queen’s House Carpark; Harrow on the Hill; 15-29 College Road; Havelock Place; Station Road East; Greenhill Way; Carpark Ellen Web Drive; Peel Road; Travis Perkins Wealdstone; Roxeth Library &amp; Clinic; Northolt Road Nursery and Carpark at rear of 27 Northolt Road; and Travellers Rest Kenton Road are located in close walking distance to local facilities and services, and/or hold a PTAL score of either 5 or 6, suggesting good accessibility via public transport.</li> </ul>
Provision of accessible housing (Protected characteristics: disability)	The provision of well designed, accessible housing, as well as the provision for the conversion of existing dwellings to adaptable housing, should help to ensure that future residents within minority groups (e.g. residents with disabilities and/or other needs) are able to locate suitable housing within the Borough.	<ul style="list-style-type: none"> <li>HO1 Dwelling Size Mix</li> <li>HO2 Conversion and redevelopment of larger dwellings</li> <li>HO6 Accommodation for Older People</li> <li>HO7 Supported and Sheltered Housing</li> <li>HO10 Housing with Shared Facilities (HMO)</li> <li>Vernon Lodge and Wolstenholme will provide older persons housing.</li> </ul>
Provision of affordable housing (Protected characteristics: disability)	The provision of affordable and low cost rent homes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups. This	<ul style="list-style-type: none"> <li>HO2 Conversion and redevelopment of larger dwellings</li> <li>HO4 Genuinely Affordable Housing</li> </ul>



Identified Effect and Protected Characteristics Impact	Description	Relevant Policies and Sites
disability, age, race, religion or belief)	provision should allow residents, especially families, to live in suitable, but affordable accommodation including those with disabilities who may have specialist housing needs; and young people who may disproportionately struggle to afford housing.	<ul style="list-style-type: none"> <li>• HO5 Housing Estate Renewal and Regeneration</li> <li>• All residential sites should seek to secure a minimum of 35-50% affordable homes, subject to viability (in line Policy HO4 Genuinely Affordable Housing).</li> </ul>
Climate change mitigation (Protected characteristics: all)	Ensuring the development of appropriate energy infrastructure is considered to bring a number of positive benefits for all protected characteristic groups, mainly by decreasing the effects of climate change that would otherwise negatively affect Harrow's population.	<ul style="list-style-type: none"> <li>• CN2 Energy Infrastructure</li> <li>• Tesco Station Road; Queen's House Carpark; Harrow on the Hill; Rayners Lane Station Car Park; Byron Quarter; Station Road East; Peel Road; Greenhill Way; and Waitrose South Harrow will all make provision for EV chargers.</li> </ul>
Improving public transport access (Protected characteristics: all)	<p>Improving access to public transport would enable certain groups, such as people with disabilities, people going through pregnancy and maternity as well as younger and older people, to utilise services and amenities within an accessible distance.</p> <p>Enhancing connectivity between the various neighbourhood and town centres would benefit all protected characteristic groups. This will enable people to access more services, amenities and employment opportunities.</p>	<ul style="list-style-type: none"> <li>• HO5 Housing Estate Renewal and Regeneration</li> <li>• Strategic Policy 05: Harrow &amp; Wealdstone Opportunity Area</li> <li>• Strategic Policy 10 Movement</li> <li>• M1 Sustainable Transport</li> <li>• M2 Parking</li> <li>• Queen's House Carpark; Harrow on the Hill; 15-29 College Road; Havelock Place; Station Road East; Greenhill Way; Carpark Ellen Web Drive; Peel Road; Travis Perkins Wealdstone; Roxeth Library &amp; Clinic; Northolt Road Nursery</li> </ul>



Identified Effect and Protected Characteristics Impact	Description	Relevant Policies and Sites
		and Carpark at rear of 27 Northolt Road; and Travellers Rest Kenton Road are located in close walking distance to local facilities and services, and/or hold a PTAL score of either 5 or 6, suggesting good accessibility via public transport.



## 10.0 Health Impact Assessment

This section summarises the Health Impact Assessment (HIA), which has been integrated within the IIA.

HIA is not a statutory requirement of the plan preparation process, however, Planning Practice Guidance states that ‘Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making’. It also states that ‘a health impact assessment may be a useful tool to use where there are expected to be significant impacts’.

Within the IIA specific parts of the following objectives are relevant to the HIA: IIA2, IIA3, IIA4, IIA5, IIA6, IIA7, IIA8, IIA9, and IIA13. Table 10-1 summarises the potential significant positive effects the Local Plan policies and site options may create, relating to HIA. Table 10-2 summarises uncertain effects the Local Plan policies may generate relating to HIA and any mitigation and recommendations for each policy where there has been a relevant effect identified. No potential significant negative effects were identified in relation to HIA for Local Plan policies and site options.



**Table 10-1: HIA Related Potential Significant Positive Effects**

Identified Effect	Description	Relevant Policies
Improving access to community infrastructure	<p>Improving access to community infrastructure, such as formal and informal sport and recreational facilities, encourages physical activity and delivers a range of social, health and wellbeing benefits to communities, which promotes a healthy and high quality lifestyles.</p> <p>The Local Plan would also see the delivery of more direct health interventions such as improved health and social infrastructure provision to meet needs.</p>	<ul style="list-style-type: none"> <li>• Policy HO5 Housing Estate Renewal and Regeneration</li> <li>• CI1 Safeguarding and Securing Social Infrastructure</li> <li>• CI2 Play and Informal Recreation</li> <li>• CI3 Sport and Recreation</li> <li>• Royal National Orthopaedic Hospital will support the redevelopment/ expansion of the existing hospital.</li> <li>• Greenhill Way, Poets Corner &amp; Milton Road, Byron Quarter, Roxeth Library &amp; Clinic and Waitrose South Harrow may support the provision of NHS floorspace.</li> <li>• Belmont Clinic will support the redevelopment/ expansion of the existing medical centre.</li> </ul>
Safe neighbourhoods	<p>All new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances. This should create safe neighbourhoods, suitable for all members of the community.</p>	<ul style="list-style-type: none"> <li>• GR3A Inclusive Design</li> </ul>
Climate change mitigation	<p>Implementing measures to mitigate against the effects of climate change should improve air quality. This would benefit the young, the elderly, those with underlying health</p>	<ul style="list-style-type: none"> <li>• CN2 Energy Infrastructure</li> <li>• CN1 Sustainable Design and Retrofitting</li> </ul>



Identified Effect	Description	Relevant Policies
	<p>conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.</p> <p>Increasing the resilience of the Borough to climate change, such buildings and infrastructure designed to withstand extreme weather, reduced flood risk and public spaces designed for hotter weather would also help to reduce risks of major health issues caused by episodes of extreme weather.</p> <p>Reducing carbon emissions could reduce the health effects associated with climate change-induced extreme weather events, such as heat-related illnesses as will more energy efficient design which should reduce the risk of overheating in buildings.</p>	<ul style="list-style-type: none"> <li>• Tesco Station Road; Queen’s House Carpark; Harrow on the Hill; Rayners Lane Station Car Park; Byron Quarter; Station Road East; Peel Road; Greenhill Way; and Waitrose South Harrow will all make provision for EV chargers.</li> </ul>
<p>Improving access to public transport</p>	<p>Improving access to public transport would reduce reliance on private vehicle usage, and therefore improve air quality. This should benefit the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.</p> <p>The Local Plan supports many of the wider determinants of health, including increased employment and active travel options which will likely have a positive impact on both the mental and physical health of residents.</p>	<ul style="list-style-type: none"> <li>• Strategic Policy 05: Harrow &amp; Wealdstone Opportunity Area</li> <li>• Strategic Policy 10 Movement</li> <li>• M1 Sustainable Transport</li> <li>• M2 Parking</li> <li>• Queen’s House Carpark; Harrow on the Hill; 15-29 College Road; Havelock Place; Station Road East; Greenhill Way; Carpark Ellen Web Drive; Peel Road; Travis Perkins Wealdstone; Roxeth Library &amp; Clinic; Northolt Road Nursery and Carpark at rear of 27 Northolt Road; and Travellers Rest Kenton Road are located in close</li> </ul>



Identified Effect	Description	Relevant Policies
		walking distance to local facilities and services, and/or hold a PTAL score of either 5 or 6, suggesting good accessibility via public transport.
Provision of open space	The protection and enhancement of open spaces would provide areas within the urban environment further protection from sources of noise or poor air quality, such as industry or roads. Provision of open space supports delivery of physical and mental health benefits.	<ul style="list-style-type: none"> <li>• GI2: Open Space</li> <li>• All sites are located within 800m of open space</li> </ul>
Provision of affordable housing	The provision of affordable and low-cost rent homes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities.	<ul style="list-style-type: none"> <li>• HO2 Conversion and redevelopment of larger dwellings</li> <li>• Policy HO4 Genuinely Affordable Housing</li> <li>• Policy HO5 Housing Estate Renewal and Regeneration</li> <li>• All residential sites should seek to secure a minimum of 35-50% affordable homes, subject to viability (in line Policy HO4 Genuinely Affordable Housing).</li> </ul>



**Table 10-2: HIA Related Uncertain Effects**

Identified Effect	Description	Relevant Policies
Pollution	It is uncertain whether allocation sites in clusters (e.g. in Harrow & Wealdstone) could contribute to cumulative negative effects on air pollution. An increase to air pollution may disproportionately affect the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.	<ul style="list-style-type: none"> <li>• Strategic Policy 03: Meeting Harrow's Housing Needs</li> <li>• Sites located clusters (e.g. in Wealdstone and Harrow) could combine to create cumulative effects with regards to pollution (air, noise and light).</li> </ul>

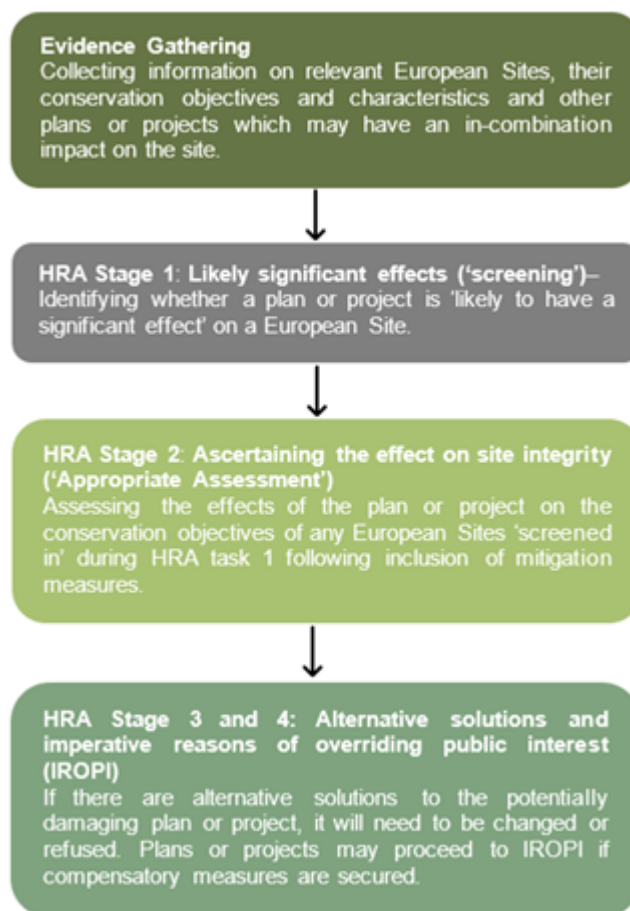




## 11.0 Habitats Regulations Assessment

This section summarises the HRA Report which can be found in Appendix G of this IIA Report.

Figure 11-1 which sets out the overall HRA process in accordance with Communities and Local Government draft guidance<sup>18</sup>. Current best practice demonstrates that a blurring of the tasks in an iterative manner is the most effective method of assessing a plan as it develops.



**Figure 11-1: The HRA Process**

The HRA process requires close working with Natural England in order to agree the process and outcomes and, if necessary, obtain information and agree mitigation proposals.

Appendix B of the IIA Scoping Report (October 2023) set out the scope of the HRA. No European designated Habitat Sites are present within Harrow Borough but the HRA will consider whether there is potential for activities within the Borough of Harrow

<sup>18</sup> English Nature (2006) draft Guidance – The Assessment of Regional Spatial Strategies and Sub-regional strategies under the provisions of the Habitats Regulations



(resulting from the draft Local Plan) to affect Habitats Sites outside of the Borough i.e. via an 'impact pathway'. Wimbledon Common and Richmond Park are the closest SACs to Harrow, located between 11km and 14 km South of the Borough boundary. South West London Waterbodies is the closest SPA to Harrow, located 13 km South-West of the Borough boundary. Appendix G of this IIA Report sets out information about these sites including their location, reasons for designation, current condition, vulnerabilities and factors affecting integrity.

## 11.1 Screening

The purpose of screening is to identify whether a plan or project could result in Likely Significant Effects (LSE) on any of the Habitat Sites included within the scope of the HRA, in terms of its conservation objectives and qualifying interests.

Each preferred policy within the draft Local Plan has been screened to identify pathways between the policies and the Habitats Sites, in isolation and/or in combination with other plans or projects.

The screening has identified potential impact pathways in relation to:

- Recreation - the plan in combination could potentially affect all of the Habitats Sites, as follows:
  - Epping Forest SAC;
  - Wormley-Hoddesdonpark Woods SAC;
  - Chiltern Beechwoods SAC;
  - Burnham Beeches SAC;
  - Wimbledon Common SAC;
  - Richmond Park SAC;
  - South West London Waterbodies SPA;
  - Windsor Forest & Great Park SAC;
  - Thames Basin Heaths SPA;
  - Thursley, Ash, Pirbright & Chobham SPA;
  - Thames Estuary & Marshes SPA and Ramsar;
  - Essex Estuaries SAC;
  - Medway Estuary & Marshes SPA; and
  - Lee Valley SPA and Ramsar.

Air quality - the plan in combination, could potentially affect the following Habitats Sites:

- Epping Forest SAC;
- Wormley-Hoddesdonpark Woods SAC;
- Chiltern Beechwoods SAC;
- Burnham Beeches SAC;
- Wimbledon Common SAC;



- Richmond Park SAC;
- South West London Waterbodies SPA;
- Windsor Forest & Great Park SAC;
- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SPA;
- Thames Estuary & Marshes SPA and Ramsar;
- Essex Estuaries SAC;
- Medway Estuary & Marshes SPA; and
- Lee Valley SPA and Ramsar.

Water quality - the plan in combination, could potentially affect the following Habitats Sites:

- Thames Estuary Marshes SPA and Ramsar.

Water resources - the plan in combination, could potentially affect the following Habitats Sites:

- Lee Valley SPA and Ramsar.

The potential risks to Habitats Sites relate to the quantum of development proposed. The policies that have a direct relationship to the quantum of development are those listed below and therefore these are the policies that need to be considered further in relation to potential impact pathways. The policies for which potential pathways could exist leading to effects on recreation, air quality, water quality and water resources, in combination with other plans and projects, are as follows:

- Spatial Strategy Policy;
- Strategic Policy 01: High Quality Growth;
- Strategic Policy 03: Meeting Harrow's Housing Needs;
- HO1 Dwelling Size Mix;
- HO3 Optimising the use of small housing sites;
- Strategic Policy 04: Local Economy;
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area;
- LE3 Industrial Land;
- LE4 Culture and Creative Industries; and
- LE5 Tourism and Visitor Accommodation.

Natural England acknowledged receipt of the Regulation 18 IIA Report (February 2024) and stated that the organisation had 'no comments to make' on the IIA and the HRA Screening for the Harrow Local Plan.

Following screening of the Regulation 18 Local Plan, further investigation was undertaken in the next stage of the HRA, Appropriate Assessment (AA).



## 11.2 Appropriate Assessment

The AA has considered the potential for impact pathways to undermine the Conservation Objectives of the Habitats Sites identified above and to ascertain whether significant effects can be excluded. This has involved further evaluation of the potential pathways for the Local Plan in combination with other Plans and Projects.

Mitigation was put forward in the AA. This mitigation has been incorporated into Local Plan Strategic Policy 08: Responding to the Climate and Nature Emergency and Policy CN4: Sustainable Drainage and additional wording added to the supporting text of these policies within the Regulation 19 version of the draft Local Plan. With the mitigation in place, the AA has determined that adverse effects on the integrity of the Habitat Sites (as listed above) can be excluded from the Harrow Local Plan, alone and in combination with other plans and projects. Natural England will be consulted on the conclusions of the AA prior to submission of the Local Plan for Examination.



## 12.0 Potential Cumulative Effects

This section describes potential cumulative effects which may arise as a result of the draft Local Plan.

Potential cumulative effects have been identified in the assessment of the draft Local Plan policies and sites (with regards to the potential effects of the policies and sites interacting or combining) and also with respect to other plans and projects in the Borough and in neighbouring areas.

Potential cumulative effects identified in the assessment of policies are listed in Table 12-1. Please note, in Table 12-1, where a Chapter of the draft Local Plan is referred to, all of the policies within that Chapter are considered to contribute to the potential cumulative effect, including strategic policies.

Potential cumulative effects identified in the assessment of sites are listed in Table 12-2. The precise nature of potential cumulative effects will depend on the sites taken forward as allocations within the Local Plan.

The plans considered for potential cumulative effects are listed below:

- London Borough of Ealing Development Plan 2011-2026;
- London Borough of Brent Local Plan 2019-2041;
- London Borough of Hillingdon Local Plan 2011-2026;
- London Borough of Barnet Local Plan 2011-2026;
- London Borough of Barnet Draft Local Plan 2021-2036;
- Three Rivers District Core Strategy 2011-2026;
- Hertsmere Borough Core Strategy 2012-2027; and
- The London Plan 2021.

The projects considered for cumulative effects are listed below:

- The West London Orbital; and
- The Mayors Superloop.

Potential cumulative effects relating to other plans and projects are identified within Table 12-3 and Table 12-4 respectively.



**Table 12-1: Potential Cumulative Effects Identified in the Assessment of Local Plan Policies (Intra Plan)**

Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
Spatial Strategy Policy, Strategic Policy O4 (Local Economy), Policy LE1 (Development Principles and Town Centre Hierarchy), Policy LE2 (Night-time and Evening Economy), Policy LE4 (Culture and Creative Industries), Policy LE5 (Tourism), Strategic Policy 05 (Harrow and Wealdstone Opportunity Area)	IIA1 (Economy)	Positive cumulative effect	These policies will all direct growth into town centre areas, such as the Harrow Metropolitan Area and preserve and develop uses including retail, leisure and cultural extensions, hotels, and the nighttime economy within town centres. Collectively, this will assist in increasing the footfall, vibrancy and vitality of the Borough's town centres, supporting economic growth and regeneration and could result in a potential positive cumulative effect on IIA1.
Strategic Policy 03, Policy HO1 (Dwelling Mix), Policy M1 (Sustainable Movement), Strategic Policy 05	IIA3 (Accessibility), IIA6 (Sustainable Travel)	Positive cumulative effect	These policies encourage development to be focused into areas which have existing good access to local services and facilities. Chapter 10 of this Plan (specifically Policy M1), Policy HO1 and the London Mayor's Transport Strategy (MTS) are also working to ensure there is good access to services via active and sustainable transport modes throughout the Borough. Therefore, a potential positive cumulative effect has been



Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
			recorded for IIA objectives IIA3 and IIA6.
Spatial Strategy Policy, Strategic Policy 01, Strategic Policy 03, Strategic Policy 05	IIA3 (Accessibility), IIA4 (Health and Wellbeing)	Uncertain cumulative effect	<p>The emphasis of new development requiring access to good public transport (through PTAL scores of 3 or higher) could lead to a focussing of development in limited areas of the Borough, around established town and district centres (which is where PTAL scores of 3 or higher currently exist). This could indirectly increase demand in such locations for local schools, healthcare services and leisure facilities, particularly within the Harrow Weald Opportunity Area – in which a minimum of 7,500 homes will be developed over the plan period. Policies within Chapters 06, 07 and 08 of the Local Plan seek to deliver community infrastructure in tandem with new development in these areas.</p> <p>Conversely, areas located further away from Opportunity Areas and those with lower PTAL scores may not receive enough development to maintain or create additional services and infrastructure, thus these areas</p>



Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
			will not see an increase in sustainable/active transport permeability or receive additional infrastructure.
Policy HO6: Accommodation for Older People and Policy HO7: Supported and Sheltered Housing	IIA5 (Housing)	Positive cumulative effect	Policies HO6 and HO7 work to ensure there is specialist housing available for those in the Borough who require it, accompanied by places to mix and meet and carer accommodation where appropriate. This could result in a potential positive cumulative effect with regards to housing delivery for residents who require specialist housing.
Spatial Strategy Policy, Strategic Policy 03, Chapter 08: Responding to the Climate and Nature Emergency, Chapter 11: Transport	IIA8 (Minimising contributions to climate change)	Positive cumulative effect	Focusing development in the Harrow and Wealdstone Opportunity Area, followed by locations within/ proximity to town centres, public transport hubs and highly accessible locations with a PTAL score 3-6 could support the achievement of a low carbon Borough, where residents and workers are able to access services, employment, education and facilities through the use of active and sustainable travel. A potential positive cumulative effect is therefore identified in relation to IIA8.





Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
Policy HO3 (Small sites), Policy GI3 (Biodiversity)	IIA10 (Biodiversity)	Positive cumulative effect	Both policies require the protection and enhancement of biodiversity and green infrastructure, with additional requirements around BNG within Policy GI3 (which reflect national regulations for BNG). This should help to ensure biodiversity is considered throughout all small housing site developments and a net positive cumulative effect on biodiversity is achieved in the Borough.
Policies within Chapter 7 (Green Infrastructure), Chapter 08 (Responding to the Climate and Nature Emergency)	IIA10 (Biodiversity)	Positive cumulative effect	Policies within Chapter 7 (Green Infrastructure) all work towards the protection and enhancement of green and blue spaces, biodiversity and designated land such as Green Belt. Access to such spaces is also sought to be improved where appropriate. Similarly, policies within Chapter 08 (Responding to the Climate and Nature Emergency) encourage the use of nature to provide green mobility and support healthy living. A potential positive cumulative effect is therefore identified in relation to IIA10.
Policy GR6 (Area of Special Character), Chapter 03 (Heritage)	IIA11 (Historic Environment)	Positive cumulative effect	Policy GR6 will protect Areas of Special Character, including the



Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
			architectural, historic and landscape features that contribute to the area of special character. This could work in combination with policies in Chapter 03 (Heritage) to preserve and enhance the historic environment and result in a potential positive cumulative effect.



**Table 12-2: Potential Cumulative Effects Identified in the Assessment of Sites**

Sites	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
Tesco Station Road, Carpark Ellen Webb Drive, Queen's House Carpark, Harrow on the Hill, Byron Quarter, Station Road East, Former Kodak Offices, Kodak, Greenhill Way, Havelock Place, 15-29 College Road.	IIA1 (Economy)	Positive cumulative effect	The redevelopment of these sites to provide mixed use development within Harrow and Wealdstone town centre boundaries could help to enhance current town centre uses and revitalise the area.
Tesco Station Road, Carpark Ellen Webb Drive, Queen's House Carpark, Harrow on the Hill, Byron Quarter, Station Road East, Former Kodak Offices, Kodak, Greenhill Way, Havelock Place, 15-29 College Road.	IIA2 (Employment)	Positive cumulative effect	The development of multiple mixed use and employment sites within the Harrow and Wealdstone opportunity area could help to ensure a considerable employment offering is available in this area.
Royal National Orthopaedic Hospital, Pinner Telephone Exchange, Vernon Lodge, and Watling Farm.	IIA3 (Accessibility and Inequalities)	Negative cumulative effect	Sites with poor access to facilities/services and a low PTAL could make education / employment / leisure facilities /services inaccessible without private cars.



Sites	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
All residential sites	IIA5 (Housing)	Positive cumulative effect	35-50% of all development on residential sites will be developed as affordable housing (where viable).
Belmont Clinic, Royal National Orthopaedic Hospital, Harrow View Telephone Exchange, Pinner Telephone Exchange, Vernon Lodge, Watling Farm and Wolstenholme.	IIA6 (Sustainable Travel)	Negative cumulative effect	Sites with poor access to sustainable transport and a low PTAL could make education/employment/leisure facilities /services inaccessible without private cars.
Sites located in clusters (e.g. in Harrow and Wealdstone)	IIA7 (Air, Light and Noise Pollution)	Uncertain cumulative effect	The effect of these sites could combine to create cumulative effects with regards to pollution (air, noise and light). An uncertain effect is identified as it's unclear whether the potential combined effects of pollution can be mitigated.
All residential sites	IIA8 (Climate Change Contributions)	Uncertain cumulative effect	The provision of EV charging points is only required in new development where car parking is being provided. However, the amount of EV charging points is not identified and it is uncertain whether this will meet demand.
Harrow School Estate and John Lyons School, Royal National Orthopaedic Hospital and Watling Farm.	IIA12 (Landscape and Townscape)	Negative cumulative effect	Development of these sites could result in a loss of openness and cause urban sprawl.
Byron Quarter, Royal National Orthopaedic Hospital, Watling Farm, Grange Farm, Harrow Arts Centre, Belmont Clinic,	IIA13 (Water and Soil)	Negative cumulative effect	Development of all of these sites which are partially greenfield could lead to the permanent and irreversible loss of greenfield land.



Sites	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative effects
Wolstenholme, Marsh Lane Gas Holders and Anmer Lodge.			



**Table 12-3: Potential Cumulative Effects with other Plans**

Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p><b>London Borough of Ealing Development Plan 2011-2026:</b> Ealing’s existing Development Plan was adopted in 2012 and encompasses the period 2011-2026. A new Local Plan is being prepared. Consultation for Reg 18 closed in February 2023, with consultation for Reg 19 planned for February 2024. It is predicted that Ealing’s population could exceed 349,000 by 2026. The extant Development Plan<sup>19</sup> plans for growth concentrated in town centres (including Acton, Ealing, Greenford and Southall), areas with good existing or future public transport links (including Greenford, North Acton and Acton Mainline), and existing housing/industrial estates which are in need of regeneration (Copley Close, Havelock, Green Man Lane and South Acton). The closest area of Ealing to Harrow is Northolt, which is proposed to accommodate a total of 3,000 homes. Another 1000 homes are proposed on mixed use sites close to the border with Harrow. By 2026 the plan aims to deliver approximately 14,000 new homes, 94,500 sqm of new office floorspace, up to 128,400 gross sqm of new retail floorspace and its net stock of industrial floorspace by 57,000 sqm</p>	<p>IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified between the growth within the new Harrow Borough Local Plan and the Ealing Development Plan. The growth in the new Harrow Borough Local Plan could combine with growth within the Ealing Development Plan, particularly in Greenford, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>

<sup>19</sup> Development Strategy 2026- Development Plan Document. Ealing Council (2012).



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>(equivalent to 14 hectares) through managed release. The plan aims to provide a net increase of 10,600 jobs. At least 50% of housing developed in the Borough up to 2026 will be affordable housing.</p> <p>The strategic objectives for Ealing are to provide new housing, especially affordable homes for local families; sustain and create jobs; protect and enhance green and open space and the Borough's heritage; and ensure that community facilities, services and transport infrastructure are provided where and when needed.</p>			
<p><b>London Borough of Brent Local Plan 2019-2041:</b> A new Local Plan was adopted: in 2022 and spans the period 2019-2041. The Brent Strategic Housing Market Assessment 2018 (SHMA) identified a need for approximately 48,000 additional homes between 2016- 2041 (1,920 dwellings per annum). Affordable housing comprises 46% of this development need. The new Local Plan<sup>20</sup> plans for growth concentrated in Wembley Growth Area. The plan will provide at least 15,000 new homes in this area. A number of additional growth areas have also been identified, including Burnt Oak/Colindale (2,100 new homes), Northwick Park (1,900 new</p>	<p>IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified between the growth within the new Harrow Borough Local Plan and the Brent Local Plan. The growth in the new Harrow Borough Local Plan could combine with growth within the Brent Local Plan, particularly in Burnt Oak/Colindale, Northwick Park and Kenton, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>

<sup>20</sup> Brent Local Plan 2019-2041. London Borough of Brent Council (2022).



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>homes) Kenton (proposed as a mixed use development site). At least 50% of housing developed in the Borough up to 2041 will be affordable housing.</p> <p>The development vision for Brent includes: strong and inclusive communities; making the best use of land; creating a healthy Borough; growing a good economy; increasing efficiency and resilience; and delivering the homes to meet Brent’s needs.</p>			
<p><b>London Borough of Hillingdon Local Plan 2011-2026:</b> Hillingdon’s existing Local Plan was adopted in 2012 and encompasses the period 2011-2026. A new Local Plan is being prepared. Regulation 18 consultation will commence in April 2024. It is predicted that Hillingdon’s population could exceed 296,000 by 2026. By 2026, the current Local Plan<sup>21</sup> aims to deliver a minimum of 6,375 new homes, and 358 ha of designated employment land. The plan aims to provide a net increase of 9,000 jobs. At least 35% of housing developed in the Borough up to 2026 will be affordable housing. 75% of housing growth is focused to the South of the A40, with almost 25% of new homes being allocated to Uxbridge North. The Local Plan concentrates employment growth in the Heathrow Opportunity Area, town centres</p>	<p>IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified as the growth in the new Harrow Borough Local Plan could combine with growth within the Hillingdon Local Plan, particularly in Eastcote, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>

<sup>21</sup> A Vision for 2026- Local Plan. London Borough of Hillingdon Council (2012).





Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>(including Uxbridge and Hayes), and existing =Strategic Industrial Locations, Locally Significant Employment Locations, and Locally Significant Industrial Sites.</p> <p>The district centre of Eastcote is closest to Harrow’s border.</p> <p>25 strategic objectives were developed in Hillingdon’s Local Plan, including:</p> <ul style="list-style-type: none"> <li>• SO7: Address housing needs in Hillingdon using appropriate planning measures;</li> <li>• SO14: Provide 9,000 new jobs and accommodate most economic growth in Uxbridge and the Heathrow Opportunity Area;</li> <li>• SO15: Protect land for employment uses to meet the needs of different sectors of the economy and manage the release of surplus employment land for other uses; and</li> </ul> <p>SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.</p>			
<p><b>London Borough of Barnet Local Plan 2011-2026:</b></p> <p>Barnet’s existing Local Plan was adopted in 2012 and encompasses the period 2011-2026. A new Local Plan is being prepared, that has been submitted for examination. It is predicted that Barnet’s population could exceed 384,000 by 2026.</p> <p>By 2026/27 the current Local Plan aims to deliver approximately 16,000 new homes and a net increase of 20,000 jobs. At least 50% of housing</p>	<p>IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified as the growth in the new Harrow Borough Local Plan could combine with growth within the Barnet Local Plan, particularly in Edgware, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>developed in the Borough up to 2026 will be affordable housing.</p> <p>The existing Local Plan concentrates housing and employment growth in the Colindale Opportunity Area, including Edgware, with the previous London Plan (2008) identifying a minimum target of 10,000 new homes and 500 new jobs to be provided in this area by 2026.</p> <p>The previous London Plan (2008) also identified Mill Hill East (48 hectares) as an Area for Intensification with a minimum target of 3,500 new homes and 500 new jobs delivered between 2001 and 2026. A new mixed use high street comprising around 1,000m<sup>2</sup> of retail floorspace was proposed to be delivered in Mill Hill East, by 2024.</p> <p>The core objectives for Barnet are to manage housing growth to meet housing aspirations; to meet social infrastructure needs; to promote Barnet as a place of economic growth and prosperity; and to promote healthy living and well-being, among others.</p>			
<p><b>London Borough of Barnet Local Plan 2021-2036:</b></p> <p>Barnet’s new Local Plan has been submitted for examination, following a main modification in May 2024. Barnet proposes to meet the London Plan target of 35,460 new homes over the Plan Period up to 2036, while providing a supply of sites for up to 46,000 new homes. The Colindale Growth Area has the capacity to deliver 4,100 new homes</p>	<p>IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified as the growth in the new Harrow Borough Local Plan could combine with growth within the new Barnet Local Plan, particularly in Edgware, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air,</p>



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>within the Plan Period, while the Edgware Growth Area has the capacity to deliver 5000 new homes. Edgware Town Centre and Edgware Underground and Bus Station are identified as key regeneration sites within the Edgware Growth Area. The Council will seek a minimum of 35% affordable housing from all developments of 10 or more dwellings.</p> <p>During the plan period Barnet will deliver more than 27,000 new jobs, with the majority of these to be generated in the Brent Cross Growth Area where permission has been granted for 395,000 m2 of offices which now forms part of Use Class E – Commercial, Business and Service Uses.</p> <p>12 strategic objectives were developed in the new Barnet Local Plan, including:</p> <ul style="list-style-type: none"> <li>• To deliver growth to meet housing aspirations and needs</li> <li>• To improve the quality and types of housing across the Borough in response to resident needs and demographic change</li> <li>• To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery</li> </ul>			<p>Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>
<p><b>Three Rivers District Core Strategy 2011-2026:</b> The existing Local Plan for Three Rivers District was adopted in 2011 and encompasses the period 2011-2026. A new Local Plan is being prepared.</p>	<p>IIA6 (Sustainable Travel),</p>	<p>Negative cumulative effect</p>	<p>There is a strategic employment site close to the Three Rivers border which Harrow residents could travel to. A potential negative cumulative effect</p>



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>Consultation for Regulation 18 concluded in December 2023.</p> <p>By 2026, the current Local Plan<sup>22</sup> aims to deliver a minimum of 4,500 new homes. The plan aims to provide a net increase of 2,378 jobs. At least 45% of housing delivered in the Borough up to 2026 should be affordable housing.</p> <p>The Local Plan directs housing and employment growth towards previously developed land (including surplus employment land) and appropriate infilling opportunities, such as the Principal Town (Rickmansworth) and Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden and Garston and Mill End).</p> <p>12 strategic objectives were developed in Three Rivers Core Strategy, including:</p> <ul style="list-style-type: none"> <li>• To balance the community’s need for future homes and jobs;</li> <li>• To increase levels of affordable housing in the District; and</li> <li>• To facilitate the provision of services and infrastructure to meet the needs of existing and new development.</li> </ul>	<p>IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>		<p>has been identified between the growth within the new Harrow Borough Local Plan and the Three Rivers Local Plan. The growth in the new Harrow Borough Local Plan could combine with growth within the Three Rivers Local Plan, particularly in South Oxhey, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>
<p><b>Hertsmere Borough Core Strategy 2012-2027:</b> Hertsmere’s existing Local Plan was adopted in 2013 and encompasses the period 2012-2027. A</p>	<p>IIA6 (Sustainable Travel),</p>	<p>Negative cumulative effect</p>	<p>A potential negative cumulative effect has been identified as the growth in the new Harrow Borough Local Plan</p>

<sup>22</sup> Local Development Framework- Core Strategy. Three Rivers District Council (2011).



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<p>new Local Plan is being prepared. Consultation for Regulation 18 concluded in April 2024. Adoption of the new Local Plan is expected by 2026, with the plan covering development until 2040. It is predicted that Hertsmere’s population could exceed 116,500 by 2028.</p> <p>By 2027, the current Core Strategy<sup>23</sup> aims to deliver a minimum of 3,990 new homes. At least 35% of housing developed in the Borough up to 2027 should be affordable housing. Up to 60% of new housing will be sought in Borehamwood, at least 10% in Potters Bar, up to 25% in Bushey and at least 5% in Radlett and other suitable locations Provision will be made for the supply of at least 110 ha of designated employment land for B-class development within the Borough up to 2027. The plan proposes 2.3ha of additional employment land at Otterspool Way Employment Area. And 6.8ha of new employment land at Tylers Way Employment Area.</p> <p>The vision for Hertsmere is for the delivery of a high quality, accessible, safe and economically viable environment to be achieved through a commitment to the principles of sustainable development. 15 strategic objectives were developed in Hertsmere’s existing Core Strategy, including:</p>	<p>IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)</p>		<p>could combine with growth within the Hertsmere Local Plan, particularly in Bushey, to increase traffic on the roads in Harrow and negatively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Contributions).</p>

<sup>23</sup> Hertsmere Local Plan Development Plan Document- Core Strategy. Hertsmere Borough Council (2013).



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
<ul style="list-style-type: none"> <li>• To maintain an adequate supply of suitable land, focused on brownfield sites within the principal towns, to accommodate expected development needs and supporting community infrastructure;</li> <li>• To work towards meeting the community’s need for Affordable Housing; and</li> <li>• To provide the spatial policies necessary to deliver the land use requirements of the Hertsmere Together Community Strategy.</li> </ul>			
<p><b>The London Plan, 2021:</b> The London Plan (2021) sets out development expectations across London. The plan has set Harrow a ten year housing target (2019/20-2028/29) of 8,020, with 3,750 of these expected to be developed on small sites (below 0.25 ha in size). 165 specialist older person housing developments should be built between 2017-2029. The London Plan (2021) highlights that the majority of development should take place in the Harrow and Wealdstone Opportunity Area, which holds an indicative capacity of 5000 homes and 1000 jobs, along the Highspeed 2/Thameslink Growth Corridor. This Growth Corridor comprises of designated opportunity areas within a number of London Boroughs. The plan also names Honeypt Lane (Stanmore) and Wealdstone Industrial Area as Strategic Industrial Locations in Harrow, highlighting that</p>	N/A	N/A	No potential cumulative effect has been identified with the London Plan as the draft Harrow Local Plan aims to build upon the policies within the London Plan and to be in conformity with it.



Local Authority and Description of Plan	IIA Objective	Potential Cumulative Effect	Potential Cumulative Effects with Harrow Borough Local Plan
significant amount of industrial development will take place in these areas.			

**Table 12-4: Potential Cumulative Effects with Other Projects**

Key Project and Description	IIA Objective	Potential Cumulative Effect	Potential cumulative effects with Harrow Borough Local Plan
<p><b>West London Orbital:</b> The West London Orbital is a key strategic transport infrastructure project, that aims to implement a new Overground network on existing, underused rail lines in West London. This project will help bring forward 8,800-29,300 new homes and workspace for 23,000 new jobs. Delivery of the project is expected by 2029 at the earliest.</p> <p>The project will support growth along the Highspeed 2/Thameslink Growth Corridor, supporting housing/employment growth in areas including Burnt Oak, Colindale, Brent Cross and Cricklewood. It will also support connectivity across West London, including Harrow. This will support the use of sustainable transport, as well reduce the need to travel by car.</p>	IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8 (Climate Change Contributions)	Positive cumulative effect	A potential positive cumulative effect has been identified as the policies in the new Harrow Borough Local Plan could combine with growth within the West London Orbital Project, particularly in Burnt Oak/Colindale, to decrease traffic on the roads in Harrow and positively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Mitigation).
<p><b>The Mayors Superloop:</b> As part of the Major’s Transport Plan (2018), a new ‘Superloop’ bus network is being created. As part of this network, a new route is proposed (X183) linking Harrow to North Finchley, adding to the existing 39 routes across the Borough.</p>	IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), IIA8	Positive cumulative effect	A potential positive cumulative effect has been identified as the policies within in the new Harrow Borough Local Plan could combine with the Mayors Superloop Project to decrease traffic on the roads in Harrow and



Key Project and Description	IIA Objective	Potential Cumulative Effect	Potential cumulative effects with Harrow Borough Local Plan
<p>The new service would provide additional bus capacity in busy locations and encourage more sustainable journeys. The proposed route would also allow for quicker journeys and more transport options to move between town centre locations in Harrow, Brent and Barnet.</p>	<p>(Climate Change Contributions)</p>		<p>positively affect IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Mitigation).</p>





## 13.0 Mitigation Measures

The SEA Regulations advocate an approach whereby potential negative and uncertain effects should be addressed in line with the mitigation hierarchy:

- Avoid effects where possible;
- Reduce / minimise effects; and
- Mitigate any remaining effects (i.e. the residual effects).

Mitigation measures have been suggested where potential negative or uncertain effects have been identified within the assessment of draft policies. Specific mitigation measures for development proposals will be dealt with at the planning application stage when further detail on the layout, scale and location of development being proposed will be known. It is also important to emphasise that all proposals will be considered against the policies in the Local Plan and the London Plan 2021.

Mitigation measures put forward within the assessment of the draft Local Plan policies are listed within Table 13-2.

Enhancement measures have also been identified in order to improve the performance of some draft policies, where relevant. Enhancement measures are included within the assessment matrices within Appendix D and F.



**Table 13-1: Proposed Mitigation Measures for the Draft Local Plan Policies**

IIA Objective	Policy	Significant Effect	EqIA	HIA	Cumulative Effect? (✓ or X)	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
IIA5	Strategic Policy 04: Local Economy	?	X	X	X	The policy should expand on the benefits mixed use development schemes could bring to housing development.

**Table 13-2: Proposed Mitigation Measures for the Draft Local Plan Site Options**

IIA Objective	Sites	Significant Effect	EqIA	HIA	Cumulative Effect? (✓ or X)	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
IIA1	Poets Corner and Milton Road; Wealdstone Parole Office; Travis Perkins Wealdstone, Hatch End Telephone Exchange; North Harrow Methodist Church; Havelock Place; 15-29 College Road; and West Harrow Conservative Association.	Uncertain effect	X	X	X	Further details of the sites' redevelopment could mitigate the uncertain effect identified.
IIA2	Poets Corner and Milton Road; Wealdstone Parole Office; Travis Perkins Wealdstone;	Uncertain effect	X	X	X	Further details of the sites' redevelopment could mitigate the uncertain effect identified.



IIA Objective	Sites	Significant Effect	EqIA	HIA	Cumulative Effect? (✓ or X)	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
	Hatch End Telephone Exchange; North Harrow Methodist Church; Havelock Place; 15-29 College Road; and West Harrow Conservative Association.					
IIA3	Royal National Orthopaedic Hospital; Vernon Lodge; and Watling Farm.	Negative effect	X	X	✓	The sites should be required to make contributions to the development of accessible facilities and to improvements to the local public transport/ active travel network, either on or offsite.
IIA4	15-29 College Road.	Uncertain effect	X	X	X	Further details of the sites' redevelopment could mitigate the uncertain effect identified. The Local Plan should consider retaining the church unless it is demonstrated that there is no need for it.
IIA5	Belmont Clinic	Uncertain effect	X	X	X	Further details of the sites' redevelopment could mitigate the uncertain effect identified.
IIA6	Brethrens Meeting Hall, The Ridgeway; Royal National Orthopaedic Hospital; Harrow View Telephone Exchange; Pinner Telephone Exchange; Vernon	Negative effect	X	X	✓	The sites should be required to make contributions to improve the local public transport and active travel network, either on or offsite.



<b>IIA Objective</b>	<b>Sites</b>	<b>Significant Effect</b>	<b>EqIA</b>	<b>HIA</b>	<b>Cumulative Effect? (✓ or X)</b>	<b>Explanation and Mitigation Measures to Minimise or Avoid Potential Effects</b>
	Lodge; and Watling Farm.					
IIA7	Sites located in clusters (e.g. in Harrow and Wealdstone)	Uncertain effect	X	✓	✓	The sites should be required to implement air, noise and light mitigation measures.
IIA8	All residential sites.	Uncertain effect	X	X	✓	Local Plan policy could require a proportionate amount of EV charging points to be provided where car parking is provided in a new development.
IIA12	Harrow School Estate & John Lyon School; Royal National Orthopaedic Hospital; and Watling Farm.	Negative effect	X	X	✓	Loss of Green Belt or Metropolitan Open Land cannot be mitigated against. The developments should be required to maintain 'openness' of these sites in order to minimise the potential negative effect of redevelopment on Green Belt / MOL sites.
IIA13	Royal National Orthopaedic Hospital; and Watling Farm.	Negative effect	X	X	✓	The loss of the best and most versatile agricultural land, and greenfield land, is permanent and irreversible and cannot be mitigated.



## 14.0 Proposed Monitoring Arrangements

The SEA Regulations require monitoring of the significant environmental effects of implementing the Harrow Borough Local Plan. IIA monitoring should cover the significant economic and social effects, as well as the environmental effects.

The monitoring framework presented in Table 14-1 presents indicators for the monitoring of potential significant negative and uncertain effects which could result from the Local Plan.

The Local Plan will include a monitoring strategy containing performance indicators and targets by which the progress of the plan will be monitored and which will be reported on through the Authority Monitoring Report (AMR). The final IIA monitoring programme will be refined to focus specifically on the monitoring of residual significant negative and uncertain effects and will be included in the IIA Adoption Statement (once the Local Plan is adopted).

**Table 14-1: Proposed Monitoring Indicators**

IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
IIA1	Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association.	Uncertain whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites	Employment space delivered within the Borough and percentage of annual targets / projections
	Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road	Uncertain whether development will lead to the loss of existing employment space.	Employment space delivered within the Borough and percentage of annual targets / projections
IIA2	Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association	Uncertain whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites.	Employment space delivered within the Borough and percentage of annual targets / projections
	Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road	Uncertain whether development will lead to the loss of existing employment space, and jobs.	Employment space delivered within the Borough and percentage of annual targets / projections
IIA3	Royal National Orthopaedic Hospital; Vernon Lodge; and Watling Farm.	Sites are not within close walking distance to local services; they lack access to public transport and did not	The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to



IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
		make on site provision for further facilities and services (e.g. retail or community uses).	public transport service associated with development
IIA4	15-29 College Road	Loss of church. Uncertain whether the church has been proven as a facility no longer necessary, or if this infrastructure would be provided elsewhere.	Change in community infrastructure provision
IIA5	Strategic Policy 04: Local Economy	It is not clear how many homes will be provided by mixed use development schemes	Annual number of affordable dwellings delivered and percentage of target  Annual number of housing completions and percentage of annual targets / projections
	Strategic Policy 08: Responding to the Climate and Nature Emergency	The policy places high demand on housing design which could lead to greater costs for developers which could affect delivery.	Annual number of housing completions and percentage of annual targets / projections
IIA6	Brethrens Meeting Hall, The Ridgeway; Royal National Orthopaedic Hospital; Harrow View Telephone Exchange; Pinner Telephone Exchange; Vernon Lodge; and Watling Farm.	The sites do not have good walking distance to a number of local services, and present significant issues with accessibility to public transport.	The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development
IIA12	Harrow School Estate & John Lyon School; Royal National Orthopaedic Hospital; and Watling Farm.	The development of these sites may have an adverse effect against the purposes of the Green Belt and Metropolitan Open Land designations- which include maintaining openness, preventing urban sprawl and encouraging urban regeneration- which may	Change in Green Belt/ Metropolitan Open Land designations per annum



IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
		be contrary to national policies.	
IIA13	Royal National Orthopaedic Hospital; and Watling Farm.	The sites are either fully or partially greenfield land. Development would lead to the permanent and irreversible loss of Grade 3 agricultural land. The sites also contain or lie in close proximity to a number of historic landfills, which suggests that the land is at risk of contamination which would require further investigation.	Proportion of new development on PDL.

## 15.0 Next Steps

This IIA Report is being published for consultation for a 6-week period alongside the Regulation 19 version of the Local Plan. Following consultation with statutory consultees on both this IIA Report and the Draft Local Plan, comments received on both will be considered. Any necessary changes will be made to the IIA Report and to the Local Plan in response to consultee comments and these will be reflected within the next iteration of the Local Plan which will be the Submission Local Plan.

The Local Plan is expected to be submitted in April/May 2025 (see Table 15-1).

An IIA adoption statement will be prepared for publication when the Local Plan is adopted.

**Table 15-1: Harrow Borough Local Plan Timetable**

Local Plan Activity	Timeframe
Consultation on the Proposed Submission Local Plan – Regulation 19	4th November – 17th December 2024 (6 weeks)
Submission	April/May 2025
Examination	TBC
Adoption	TBC



