



# London Borough of Harrow Council Local Plan Integrated Impact Assessment

## Appendix C: Summary of Policy Alternatives Assessment

### London Borough of Harrow Council

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## Basis of Report

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## 1.0 Introduction

This appendix presents the findings of the reasonable alternatives to the Harrow Borough Local Plan Policies. The policies and alternatives assessed are listed in the left-hand column of each summary table. The summary tables contain the performance of reasonable policy alternatives (shown in purple colour and italics) alongside the preferred policies in order to allow comparison. Detailed assessment matrices of the alternative policies can be found within Appendix E.

For completeness, this appendix also presents the findings of new and modified policies included in the Regulation 19 Local Plan, as a result of changes made to the content of policies following Regulation 18 consultation (shown in red colour and italics). No reasonable alternatives to these new policies were identified. Detailed assessment matrices of the preferred policies can be found within Appendix D.

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

- a) Policy GR3: Public Realm and Connecting Places (IIA10 amended from neutral to minor positive);
- b) Policy HE1: Historic Environment (IIA8 and IIA9 amended from neutral to minor positive);
- c) Policy HO6: Accommodation for Older People (IIA4 amended from minor positive to significant positive); and
- d) Strategic Policy 07: Green Infrastructure (IIA11 amended from neutral to minor positive).

Four new policies have also been added to the Local Plan, and subsequently 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 Table C.1.

**Table C1-1: Key to Sustainability Significance Scores**

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

A discussion of the performance of the reasonable alternatives within each chapter is provided under Section 6 of the IIA Report. The alternatives assessed are detailed within Section 10 of this Appendix.

## 2.0 Defining the Spatial Strategy Reasonable Alternatives

The table below provides a justification for the identification of the spatial strategy reasonable alternatives.

**Table C2-1: Spatial Strategy Reasonable Alternatives**

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
<p><b>Spatial Strategy: Preferred Alternative</b></p> <p>Growth directed to H&amp;W Opportunity Area (min. 7,500), Rest of the Borough (min. 2,500), Small Sites (min 4,125), plus windfall.</p>	<p>This growth option would not be a reasonable alternative under preferred spatial strategy, as this will not deliver sufficient housing to address housing needs of circa 16,000 or Local plan evidence indicates the Borough is likely to have sufficient capacity to deliver in excess of 12,000 homes</p>	<p>Reasonable alternative</p>	<p>This is not considered a reasonable alternative, as previously developed sites would have insufficient housing capacity/infrastructure capacity to accommodate this level of housing growth within the locations that are expected to accommodate growth (e.g. Opportunity Area, small sites, edge/within Town Centres). Further, this will be contrary to the spatial strategy that seeks to protect/enhance the character of the area (including suburban location) , historic environment. Overall, this growth option will be undeliverable under this spatial strategy.</p>

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
<p><b>Spatial Strategy: Alternative 1</b>                      Current spatial strategy – growth directed to H&amp;W Opportunity Area</p>	<p>Reasonable alternative.                      This spatial strategy option could accommodate this lower housing growth option. The key difference between existing and the preferred strategy is the small sites policy that may result in development within a larger geographic area.</p>	<p>This is not considered a reasonable alternative because the current spatial strategy planned for a London Plan target of circa 350 homes per year, which has been gradually increased over time with various iterations of the London Plan (currently 802 per year). The indicative housing numbers for site allocations in the current plan are very low / insufficient to deliver growth of 16,040 new homes. The current spatial strategy also doesn't fully address the role of tall buildings in the Opportunity Area which would be required to deliver a 16,040 target.</p>	<p>Is this option not reasonable because there is not enough sites / space to deliver it without small sites, the GB/MOL sites which and employment sites needed to be developed in the spatial strategy As above, this high growth option would not be a reasonable alternative for this spatial strategy, as the Opportunity Area/area of intensification and town centre/edge of locations and small sites would have insufficient capacity to accommodate this level of growth. This level of growth will be undeliverable.</p>
<p><b>Spatial Strategy: Alternative 2</b>                      Accommodating higher growth, redevelopment of employment</p>	<p>This low housing growth option would not be a reasonable for this spatial strategy alternative 2. The key reason is that the Council is</p>	<p>This would not be a reasonable alternative, as the updated call for sites / site allocations process indicates a sufficient capacity to</p>	<p>Reasonable alternative</p>

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
land and development of greenbelt land.	likely to have sufficient capacity to address this level of growth on PDL sites within the existing urban area without the need for release of Green Belt, or employment land to meet housing needs. There would be insufficient justification to release employment land (the evidence base indicates this needs to be retained) and Green Belt / MOL if the outcome was to deliver a lower level of housing and not optimise previously developed land (PDL).	meet/exceed the 16,040 housing target. without needing to redevelop employment land (which the London Plan and evidence base indicates needs to be retained) and / or Green Belt (which the NPPF and London Plan indicates would be inappropriate development unless very special circumstances can be demonstrated).	

### 3.0 Performance of Spatial Strategy Alternatives

**Table C3-1: Summary of Spatial Strategy Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>Spatial Strategy: Alternative 1</i>	++	+	+	+	++	++	0	0	0	+	+	++	+	+
<i>Spatial Strategy: Alternative 2</i>	++	+	+	+	++	++	+	+	0	--	--	--	--	0



## 4.0 Performance of High Quality Growth Alternatives

**Table C4-1: Summary of High Quality Growth Alternative Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>GR3 Public Realm and Connecting Places</i>	0	0	+	+	0	+	+	+	+	+	+	+	0	0
<i>GR3A Inclusive Design</i>	0	0	++	+	+	+	0	0	0	0	+	0	0	0
<i>GR3B Safety, Security and Resilience to Hazards</i>	0	0	0	+	0	0	0	0	0	0	0	0	0	0
<i>GR4A Basement Development</i>	0	0	0	+	+	0	0	0	+	+	0	0	+	0
GR6 Areas of Special Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
<i>GR6 Areas of Special Character: Alternative 1</i>	0	0	0	?	0	0	0	0	0	-	-	-	0	0
GR10 Infill and Backland Sites,	0	0	+	+	+	+	0	0	0	+	0	+	0	+

Policy	IIA Objective														
Back Gardens and Amenity Areas															
<i>GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 1</i>	0	0	0	-	+	0	0	0	0	0	0	0	-	0	0
<i>GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 2</i>	0	0	?	+	?	?	0	0	0	+	0	--	0	+	
<i>GR12 Site Allocations</i>	0	0	+	0	++	+	0	0	0	0	0	+	0	0	

## 5.0 Performance of Heritage Alternatives

Table C5-1: Summary of Heritage Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>HE1 Heritage Assets</i>	+	0	0	0	0	0	0	0	0	+	++	++	0	0

## 6.0 Performance of Housing Alternatives

### 6.1 Strategic Policy 03: Meeting Harrow's Housing Needs

**Table C6-1: Summary of Strategic Policy 03 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 1</i>	?	0	+	+	?	?	--	-	-	--	?	--	--	0
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 2</i>	+	0	+	0	--	+	-	0	0	0	0	-	+	0

## 6.2 Policy HO1 Dwelling Size Mix

**Table C6-2: Summary of Policy HO1 Alternatives Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
HO1 Dwelling Size Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 1</i>	0	0	+	+	-	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 2</i>	0	0	+	+	-	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 3</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 4</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0

### 6.3 Policy HO2 Conversion and Redevelopment of Larger Dwellings

**Table C6-3: Summary of Policy HO2 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
HO2 Conversion and Redevelopment of Larger Dwellings	0	0	+	+	++	+	+	+	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 1</i>	0	0	0	+	?	0	+	0	0	0	0	0	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 2</i>	0	0	+	?	?	+	+	+	0	0	+	?	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 3</i>	0	0	+	-	?	+	+	+	0	0	+	+	+	+
<i>HO2 Conversion and</i>	0	0	-	-	++	-	-	?	0	0	+	+	+	+

Policy	IIA Objective													
<i>Redevelopment of Larger Dwellings: Alternative 4</i>														
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 5</i>	0	0	+	+	--	+	+	0	0	0	--	--	+	-
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 6</i>	0	0	?	?	++	?	+	0	0	0	+	+	+	+

## 6.4 Policy HO4 Genuinely Affordable Housing

**Table C6-4: Summary of Policy HO4 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
Policy HO4 Genuinely Affordable Housing	0	+	0	0	++	0	0	0	0	0	0	0	+	0
<i>Policy HO4 Genuinely Affordable Housing: Alternative 1</i>	0	+	0	0	+	0	0	0	0	0	0	0	+	0



## 6.5 Policy HO5 Housing Estate Renewal and Regeneration

**Table C6-5: Summary of Policy HO5 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
Policy HO5 Housing Estate Renewal and Regeneration	0	0	0	++	++	++	0	+	0	0	0	+	+	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 1</i>	0	0	?	++	?	0	0	0	0	0	0	0	0	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 2</i>	0	0	?	?	?	++	0	+	0	+	0	+	+	0

## 6.6 Policy HO6 Accommodation for Older People

**Table C6-6: Summary of HO6 Policy Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>Policy HO6 Accommodation for Older People</i>	0	0	++	+	++	+	0	+	0	0	0	0	0	0
<i>Policy HO6 Accommodation for Older People: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0
<i>Policy HO6 Accommodation for Older People: Alternative 2</i>	0	0	?	?	++	?	0	?	0	0	0	0	0	0
<i>Policy HO6 Accommodation for Older People: Alternative 3</i>	0	0	+	+	?	+	0	+	0	0	0	0	0	0

## 6.7 Policy HO7 Supported and Sheltered Housing

**Table C6-7: Summary of HO7 Alternative Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
Policy HO7 Supported and Sheltered Housing	0	0	++	+	+	+	0	0	0	0	0	0	+	0
<i>Policy HO7: Supported and Sheltered Housing: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0

## 6.8 Policy HO8 Purpose Built Student Accommodation

**Table C6-8: Summary of Policy HO8 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
Policy HO8 Purpose Built Student Accommodation	+	0	+	+	+	+	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 1</i>	0	0	-	-	+	-	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 2</i>	+	0	+	-	+	+	-	0	0	0	0	0	0	0

## 6.9 Policy HO9 Large Scale Purpose Built Shared Living

**Table C6-9: Summary of Policy HO9 Alternatives Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
HO9 Large Scale Purpose Built Shared Living	+	+	+	+	+	+	0	+	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 1</i>	-	-	0	-	-	?	0	0	0	0	0	-	0	-
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 2</i>	+	+	+	+	-	+	0	0	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 3</i>	+	+	+	+	?	+	0	0	0	0	0	-	0	+
<i>HO9 Large Scale Purpose</i>	+	+	?	+	?	+	0	0	0	0	0	-	0	+

Policy	IIA Objective													
<i>Built Shared Living: Alternative 4</i>	Green	Green	White	Green	White	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Orange	Yellow	Green

## 6.10 Policy HO10 Housing with shared facilities (Houses in Multiple Occupation)

**Table C6-10: Summary of Policy HO10 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
HO10 Housing with shared facilities (Houses in Multiple Occupation)	0	0	+	+	++	+	0	+	+	+	0	+	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1</i>	0	0	+	0	-	+	0	+	0	0	0	?	0	-
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2</i>	0	0	+	+	--	+	0	0	+	+	0	-	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3</i>	0	0	+	+	-	+	0	0	+	+	0	-	0	+

Policy	IIA Objective													
<i>Occupation): Alternative 3</i>														
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 4</i>	0	0	-	+	-	+	0	0	+	+	0	-	0	+



## 6.11 Policy HO12 Gypsy and Traveller Accommodation Needs

**Table C6-11: Summary of Policy HO12 Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
HO12 Gypsy and Traveller Accommodation Needs	0	0	+	+	+	+	0	0	+	+	0	+	+	+
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 1<sup>1</sup></i>	0	0	?	--	-	?	0	0	+	?	0	-	0	0
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 2</i>	0	0	--	--	--	+	0	0	+	+	0	+	+	+

<sup>1</sup> The Government included a revised wider definition for gypsies and travellers in the updated NPPF. The Council will consider the potential implications of this based on the GLA London wide GTANA that is expected to be published during 2024.

## 7.0 Performance of Local Economy Alternatives

Table C7-1: Summary of Local Economy Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
LE1 Development Principles and Town Centre Hierarchy	++	+	+	+	0	+	+	0	0	0	0	+	0	+
<i>LE1 Development Principles and Town Centre Hierarchy: Alternative 1</i>	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE3 Industrial Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 1</i>	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 2</i>	?	+	0	0	+	+	0	+	0	0	0	0	0	+

## 8.0 Performance of Green Infrastructure Alternatives

Table C8-1: Summary of Green Infrastructure Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
<i>Strategic Policy 07: Green Infrastructure</i>	0	0	0	+	0	0	+	0	+	+	+	+	+	0
GI2 Open Space	0	0	+	+	0	0	0	0	+	+	0	0	0	0
<i>GI2 Open Space: Alternative 1</i>	0	0	0	+	0	0	0	0	+	+	0	0	0	0
GI3 Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
<i>GI3 Biodiversity: Alternative 1</i>	0	0	0	+	0	0	0	0	+	++	+	0	+	0

## 9.0 Performance of Climate and Nature Alternatives

**Table C9-1: Summary of Climate and Nature Alternative Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	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
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 1</i>	+	+	0	+	+	0	0	--	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 2</i>	+	+	0	+	0	0	0	+	+	+	+	+	0	0

## 10.0 Alternatives Assessed

This section details the preferred policies and the alternatives which have been assessed.

Not all policies have an identified alternative/s. Where a policy has an identified alternative/s, the preferred policy is reproduced below and the alternative/s are provided below it.

The wording of the preferred policies has been updated following Regulation 18 consultation and is correct at the time of writing (02/10/24). The modified policies have been screened to identify wording that required re-assessment through the IIA. The up-to-date assessments of the preferred policies are reflected in the previous sections of this report and within the detailed assessment matrices in Appendix D.

### Chapter 01: Spatial Vision and Strategy and Strategic Objectives

#### 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 been responding to the climate emergency and seeing the benefits of taking early action to improve our environment. New developments are energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents have cheap, clean energy.

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.

### **Spatial Strategy:**

By 2041, new development and economic growth will provide 16,040 new low-carbon homes, create over 1,000 additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.

The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.

Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 7,500 additional new homes, and 1,000 additional new jobs.

Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.

Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates.

The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.

Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.

The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.

The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.

The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and play space will have been made.

Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected. The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise.

North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

The vitality and character of Pinner High Street will have been conserved and enhanced.

In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.

Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres, and will have provided improved pedestrian and cycle connectivity between Kenton Station and Northwick Park Station.

Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.

The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.

Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.

Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.

Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs.

### **Reasonable Alternatives**

**Alternative 1: Retain existing spatial strategy** – The Harrow Core Strategy (2012) spatial strategy seeks to deliver 6,050 new homes and 4,000 additional jobs (2015-25). The primary focus of growth is within the Harrow Wealdstone Intensification Area (i.e. 2,800 homes and 3,000 jobs), to enable good access to local facilities and services, including public transport, as well as enable the delivery of new/enhanced supporting infrastructure.

The secondary focus of growth is to promote development sites within and on the edges of existing district and local centres, to address local needs and promote their vitality/viability. It seeks to ensure development delivers the regeneration of the centres, via improving the public realm.

The spatial strategy also seeks to support the re-development/ intensification of strategic brownfield suburban sites and regeneration areas (e.g. Council estates) outside the above locations, to deliver additional housing and enable the delivery of new/enhanced supporting infrastructure, as well as to help address deprivation. Most of these areas/sites may have been developed since the adoption of the existing Local Plan.

In addition, this spatial strategy seeks to maintain the existing supply of employment floor space, protect/enhance the Boroughs Green Belt, MOL and open spaces and special character areas, and the character of suburban locations, heritage assets and historic environment.

**Alternative 2: Strategy which delivers a higher level of development than identified in the proposed strategy**– This spatial strategy would accommodate a higher level of growth than the minimum housing targets set for Harrow in the London Plan 2021, and beyond the Objectively Assessed Need for employment, retail and cultural / leisure floorspace and infrastructure capacity . Such an approach would meet a greater proportion of the Borough's

Objectively Assessed for housing (as calculated by the Government's Standard Methodology or the housing growth requirement of 24,266 units identified by the Local Housing Needs Assessment).

In line with the London Plan 2021 this would require the Council to explore all options for accommodating housing growth on previously developed sites within the existing built-up areas of the Borough. This would prioritise accommodating a higher proportion of housing within the Harrow and Wealdstone Opportunity Area, followed by sites within and on the edge of town centres (particularly the larger centres), small sites within locations with good accessibility (PTAL 3-6), sites within proximity (800m) to larger town centres, railway/tube stations, and other locations (i.e. the preferred spatial strategy).

However, this spatial strategy would also require developing green field / Green Belt / Metropolitan Open Land sites, employment land, sites in less sustainable locations within the boroughs, or at densities and heights significantly above the predominantly suburban nature of most of the borough. Such an approach would risk being contrary to the evidence base informing the Local Plan (such as the need to retain open space and employment land, the Characterisation study of the borough, or NPPF / London Plan requirements relating to Green Belt / MOL). This spatial strategy would contribute to closing the gap between the minimum London Plan housing targets for the Borough and the actual Objectively Assessed Needs identified by the standard methodology.

## Chapter 02: High Quality Growth

**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.

**Policy GR6: Areas of Special Character** – one reasonable alternative identified

A. Proposals affecting an area of special character will be assessed regarding:

- a. The impact of the proposal upon the strategic value of the area of special character;
- b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and
- c. The protected views to and from areas of special character.

B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.

C. Proposals that would substantially harm an area of special character, or its setting, will be refused.



**Reasonable Alternative 1: No Policy Option:**

The draft policy seeks to protect the contribution that the elevated parts of the borough make to the distinctive local character of the borough. There is however no formal obligation under the NPPF nor the London Plan to include such a policy nor designate such areas on the Policies Map. It would therefore be a reasonable alternative not to include a policy / designation. Such an alternative would however impact on the Council's ability to set out expectations for development and protect the areas that have been identified within the borough as having special character, and by reason of their elevated nature, harm by new development is likely to be exacerbated over a wider area. Such an option is therefore not the Council's preferred option.

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

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

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

## Reasonable Alternatives:

### **Policy GR10: Infill and backland sites, back gardens and amenity areas**

#### *General*

- A. Proposals on Infill, backland sites, [non-designated] open space, garden land and garage sites will only be acceptable where:
- a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in;
  - b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].
  - c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1
  - d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.
  - e. Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.
  - f. The proposal is accessible to all.
  - g. Addresses any relevant supplementary guidance.

#### *Infill Sites*

- A. Proposals for gap sites located in an established street scene will be supported where they:
- a. Demonstrate compliance with A (a-g) above;
  - b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and
  - c. Satisfactory servicing, waste and cycle storage is provided.

#### *Backland Development*

- B. Proposals that are located on backland sites will be supported where they;
- a. Demonstrate compliance with A (a-g) above;
  - b. Provide satisfactory access to the development;
  - c. Ensure appropriate waste servicing can be provided; and
  - d. Ensure secure by design measures have been addressed.

#### *Non-designated open space*

- C. Proposals for new housing on non-designated open space will be supported where they;
- a. Demonstrate compliance with A (a-g) above;
  - b. Ensure highway safety is maintained; and
  - c. Address any relevant supplementary guidance.

#### *Garden land*

- D. Proposals for new housing on rear gardens will be resisted unless they;
- a. Demonstrate compliance with A (a-g) above; and
  - b. Form part of the comprehensive development of a number of plots.
- E. Housing on individual rear gardens will not be supported.

### *Garage sites*

- F. Proposals that seek to redevelop garage sites within a development will be supported where they:
- a. Demonstrate compliance with A (a-g) above; and
  - b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.

**Alternative 1 - No Policy Option:** This would impact on the Council's ability to set out expectations for development and protect the character and amenity of the Borough, particularly in the predominately suburban areas that are a key characteristic of the borough. Consequently, this alternative is not the Council's preferred option.

**Alternative 2 - More permissive policy:** The Strategic Housing Policy 03 identifies the amount of housing required, and where this is being strategically directed to, which is within the Harrow & Wealdstone Opportunity Area (a minimum of 7,500 dwellings). By strategically directing growth to the most sustainable location within the borough, there would be less requirement to deliver housing within suburban Harrow which would contribute to retaining its low-density, suburban character. A reasonable alternative would however be to include a more permissive policy. This however is not the Council's preferred option as such a policy could result in an inconsistency with overarching approach to direct growth to the most sustainable location within the borough (the Opportunity Area), and area capable to accommodate the most change in the borough having regard to matters such as prevailing character and building heights, and site availability). Furthermore, a more permissive policy may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to a significant amount of change that an overly permissive policy may result in.

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

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

## **Chapter 03: Heritage**

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

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

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

## **Chapter 04: Housing**

### **Strategic Policy 03: Meeting Harrow's Housing Needs– Two Reasonable Alternatives Identified.**

#### **Housing delivery:**

1. The council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the plan period (2021/222 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (policy h1, london plan), to address the future needs within the most sustainable locations of borough. Based on current estimates of borough housing capacity from all sources, the 10-year housing delivery target will be met.

2. The london plan (2021) includes a target to deliver a minimum of 3,750 (net) homes on small sites (below 0.25ha) across the borough between 2019 -2029.

3. The council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations;

A) Harrow and wealdstone opportunity area: a minimum of 7,500 will be delivered through extant permissions and on allocated sites within the opportunity area.

B) Rest of the borough: a minimum of 2,500 will be delivered through extant permissions and on allocated sites across the rest of the borough.

C) Small sites: a minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the plan and windfalls sites, in locations with good public transport accessibility (ptal 3-6) and on sites within 800m of a tube, rail station or major or district town centre boundary, providing they are sensitively designed to protect and enhance the character of the borough, particularly suburban areas. small sites: a minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the plan and windfalls sites, in locations with good public transport accessibility (ptal 3-6) and on sites within 800m of a tube, rail station or metropolitan, major or district town centre boundary, providing they are sensitively designed to protect and enhance the character of the borough, particularly suburban areas.

D) Windfall sites: development of new housing on suitable sites (below/above 0.25ha), not identified within the local plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development plan.

4. New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the borough will change over time. Development within suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations.

#### **Housing choice**

5. Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the borough. This will be achieved through;

A) genuinely affordable housing: over the plan period the council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the borough will be genuinely affordable to those in need, based on assessment of local housing costs and incomes, in line with the london plan. At least 70% of all these will be low cost rented housing and the remainder will

be intermediate products which will be genuinely affordable based on lower quartile/median housing costs and incomes of harrow residents.

B) mix of housing by size: a strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the borough over the plan period.

C) specialist older people housing:

a) The housing needs of older people will be met through:

(i) prioritising the delivery of new conventional residential accommodation in c3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.

(ii) the delivery of specialist older persons accommodation (c3) with different levels of support, and care home accommodation (c2). These should play a supplementary role to conventional c3 housing that are adaptable to the changing needs over time

(iii) the delivery of low-cost rented extra care housing within older person accommodation schemes,

b) The council will work positively with providers, to support the delivery of a minimum 980 units of specialist older person accommodation, comprising of retirement housing units and extra care housing units between 2022- 32, to address the future needs of an ageing population. A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32. The council will monitor the supply of additional older person accommodation to address local needs and undertake an updated needs assessment, if necessary.

D) . Supported and specialist accommodation: the council will work positively with the relevant authorities such as the nhs and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The council will seek to resist the loss of existing accommodation to other uses, unless the proposal is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the plan.

E) **Non-Self-Contained Accommodation:** the council will support the provision of non-self-contained housing such as houses in multiple occupancy (HMOS), hostels, large scale purpose-built shared living (LSPBSL) or purpose-built student accommodation (PBSA). This is providing;

a) A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing

b) Proposals make a positive contribution to housing choice and create mixed and balanced communities.

c) The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future borough needs and support mixed inclusive communities.

F) **Self-Build And Custom Build Housing:** the council will support proposals, for self-build and custom build housing, particularly community led

schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovative design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the development plan, particularly in relation to the provision of affordable and family sized housing.

G) **Build to Rent:** built to rent proposals will be supported within the opportunity area, Edgware major centre and district town centres. This is providing proposals (i) comply with definition and requirements of London Plan Policy H11 (ii) support high quality design that protects, respects the borough's character areas in line with SP1 and GR1. (iii) support balanced, mixed and inclusive communities

H) **Gypsy And Traveller Accommodation:** the council will maintain the existing provision of gypsy and traveller pitches. A total of three additional pitches will be delivered between 2016 – 41. The existing identified needs, and if any additional needs arise, will be addressed within an existing site.

### **Estate regeneration**

6. The council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the plan period. This will play an important role to :

- a) Increase the provision of the right type, size, tenure of housing to address local needs and meet the strategic targets
- b) Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents
- c) Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme)
- d) Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well-being of communities.
- e) Ensure existing and new residential units achieve high quality design standards
- f) Promote social interaction, cohesion between the residents to support mixed and inclusive communities.
- g) Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life

7. The council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm estate regeneration scheme during the life of the plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and development plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.

### **Safeguarding the existing housing stock**

8. Existing self-contained C3 housing will be safeguarded in accordance with London Plan Policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where:

- A. Sub-standard dwellings would be brought in line with London Plan space standards;
- B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of local plan policy H8;

- C. De-conversion of flats would create a family size home (3 bed or more)
- D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere.
- E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted.
- F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.

**Implementation:**

9. The council will monitor the implementation of the plan against the above targets, including through the use of the housing trajectory (appendix 6) and the monitoring implementation framework (appendix 2), to address future housing needs and maintain a five-land supply of deliverable sites.

**Reasonable Alternatives:**

**Alternative 1: High housing growth**

This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2021-41 based on the demographic led approach utilised by the Draft Local Housing Needs Assessment. This is based on 2018 household and population projections and considers factors such as household sizes, mortality, migration, and past suppressed household formation rates of those under 45 years of age.

This approach is not considered the preferred option due to a number of factors. The London Plan (2021) sets a Borough ten-year target of 8020 homes (2019-29) and indicates a target beyond this period should be based on evidence of capacity. Housing monitoring data indicates a total of 8,410 homes were delivered between 2009/10- 2020/21 (i.e. average of 841), which means it is likely to be difficult for the Borough to increase delivery of housing on previously developed sites to meet this within the existing urban area, beyond the London Plan target. This option is likely to require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach. There is a high risk that an insufficient level of housing sites may be submitted for permission and come forward for development in a timely manner to meet the annual target and make it difficult to maintain a five-year land supply of deliverable sites and meet the housing delivery test. This would mean the national policy of presumption in favour of sustainable development would apply, which means the Council would find it more difficult to refuse applications for new housing developments, even though they may be of a poor design, location or fail to meet local needs, or have a harmful impact on the natural/historic environment. This is likely to undermine the Plan led system and the promotion of sustainable development.

**Alternative 2 Low housing growth: Stepped trajectory over a fifteen-year plan period**

This would be based on the London Plan ten-year housing deliver target of 8020 homes (2019-29) and the need beyond this period would be based on the 2017 London SHLAA. This would comprise of the indicative capacity of large sites of 921 homes (phases 4: 2029-34) and 138 homes (phases 5:2034 -41), plus the London Plan small sites allowance of 3750 homes (10 years), all of which would total 4809 homes. Therefore, this approach results in a total housing requirement of 12,829 homes over a 20-year period (2021 -41). This assumes a higher housing requirement/need of 802 homes per annum over the first ten years (2019-29) and a lower need of 481 homes per annum during the final phases of the Plan. It should be noted the NPPF requires Plans to cover a 15-year period from the date of adoption.

The key advantages of option 2 are it may help address housing needs of the Borough in the early years of the Plan period, but there is uncertainty in relation to whether this may result in the delivery of the right size, tenure of housing (i.e. affordable and family) to address local needs, as a large proportion of the target will have been already met by existing permissions, constructions and completions, prior to the Plan being adopted. It may also have less of a potential impact on the infrastructure capacity, natural and historic environment.

This approach is not considered the preferred option, as it would fail to address the acute housing needs of the Borough, particularly for family and affordable housing. The London Plan (2021) states that any capacity beyond 2029 “should draw on the London 2017 SHLAA findings and any local evidence of identified capacity”. Therefore, the housing requirement/target will need to be based on updated local evidence of the housing capacity of the Borough. Further, this option will be highly reliant on windfall housing sites to come forward for development during the final phases of the Plan. This will undermine the Plan led system, make it more difficult for the Council to refuse both poorly designed, and poorly located proposals and to ensure proposals will address local needs, secure and deliver the supporting infrastructure and promote sustainable development.



**Policy HO1: Dwelling Size Mix– Two Reasonable Alternatives Identified.**

**A. Dwelling size mix priorities**

1. All developments for conventional residential must provide a good mix of unit sizes, to adequately address the borough’s housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities:

- i) ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites;
- ii) the remaining dwelling size mix will be determined on a case-by-case basis having regard to:
  - a) Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the local housing needs assessment (or successor documents) and local housing register;
  - b) Site size and its physical characteristics (including any identified constraints on the preferred housing mix);
  - c) Location of the site, the surrounding context, character (including town centre location) and the public transport accessibility levels;
  - d) Need to optimise housing output on previously developed land;
  - e) The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and
  - f) Potential for custom-build and community led schemes.

2. The smallest 2-bedroom dwellings for both market and affordable homes provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding

3. Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.

**B. Flatted Developments**

4. Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family members who may be disabled and elderly or may have other mobility requirements. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the scheme would result in a poor-quality living environment for families; based on the above criteria.

**C. Housing Schemes Solely Comprising Of Smaller Units**

5. Development proposals comprising solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site, will be resisted unless it can be suitably demonstrated that the housing provision:

- A. Is in an area with higher public transport access levels (i.e. Ptal 3-6); and
- B. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the council, which includes

<p>provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or</p> <p>C. Provides for a balance in the mix of unit sizes in the area; or</p> <p>D. Is the only housing format deliverable by reason of site size, site configuration or other development constraints, and where a studio unit is proposed.</p> <p>6. An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.</p> <p><b>D. Monitoring</b></p> <p>7. The council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned. Through the authorities monitoring report (amr) the council will set out progress on delivering these priorities and building the right homes for the next generation. The amr will assist in informing the council's consideration of dwelling mix on a site-by-site basis.</p>
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**Reasonable Alternatives:**

**Alternative 1: Continue with existing policy DM 24 Housing mix**

This is highly permissive. It seeks to ensure mixed and inclusive communities. The mix is determined by target mix for affordable housing, the need to increase delivery of affordable housing, site location, character of surroundings and the need to optimise housing output on previously developed land site. This policy provides no specific requirements for the size of units required for market housing that will form a significant proportion of future housing delivery and will reduce the scope of the Council to secure a higher proportion of larger dwellings or medium sized accommodation that are suitable for addressing the needs of families. This policy is not considered the preferred option, as it is likely to result in the delivery of a larger level of smaller units that will not assist in delivering against the evidenced needs of the borough as set out in the Draft LHNA.

**Alternative 2: 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)**

This approach is not considered the preferred option, as it is likely to reduce the level of family sized dwellings delivered. Key reasons are, it would reduce Councils scope to require a higher proportion of family or medium sized dwellings that are suitable for families, as well require applicants to provide evidence they have considered this. This is likely to encourage developers to build at higher densities and increase the number of smaller units, to maximise development value. Further, this would be contrary to the good planning practice of assessing the effectiveness of policy via the plan, monitor and manage approach.

**Alternative 3: include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing**

The Draft LHNA indicates there is a significant need to increase the delivery of family housing. This indicates 70% of all future housing delivered should be three bed (or more) family dwellings, based on a requirement/target of 16,040 homes during the Plan period. This approach to set a target to deliver family housing in excess of 25% is not considered the preferred option, as there is need to achieve a balance between a set of competing factors such as; the type of sites that are likely to come forward for development, their locations; the need to optimise output of sites to increase the delivery of housing to meet future needs; as well as ensure the deliverability of sites. Further, the Council's Annual Monitoring Report

indicates that the Borough had difficulties in achieving a target of ensuring 25% of all housing are family sized housing during the previous Plan period.

**Alternative 4: Do not apply 25% family housing target to minor development**

This approach is not considered the preferred option, as the London Plan anticipates that 47% of the Borough's future housing supply will come forward from small sites (below 0.25h). Therefore, this will reduce the Council's scope to increase provision of family housing from all the sites that come forward for development and address local needs.

**Policy HO2: Conversion and redevelopment of larger dwellings - six reasonable alternatives identified.**

1. To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of larger homes into smaller self-contained residential units (C3) where the criteria below are met:
  - a) The internal floor area of the existing dwelling should exceed 130m<sup>2</sup> (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed.
  - b) The conversion should provide at least one larger family sized home with a gross internal floor area of at least 74 m<sup>2</sup> and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home.
  - c) The site is within area of PTAL 3-6
2. Proposals will be required to;
  - a) Comply with the minimum internal space standards of the London Plan
  - b) Ensure the converted flat on ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities.
  - c) Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes;
  - d) Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise;
  - e) Make adequate arrangements for the provision of amenity space for future occupiers of the development; via the subdivision of this, to enable satisfactory access to a private space for each unit. In exceptional circumstances, the provision of high quality well designed communal amenity space may be acceptable, if it is demonstrated; (i) the subdivision of amenity space would be unsuitable due to site constraints; (ii) there will be adequate privacy safeguards for ground floor occupants and (ii) robust arrangements for long term their management and maintenance.
  - f) Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers;
  - g) Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;

- h) Demonstrate adequate measures are taken to increase the level of and enhance soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) and limit the need for hard landscaping areas, to ensure proposals do not detract from the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity;
  - i) Make adequate provision for parking (in line with Policy M2) and safe access to and within the site and not lead to any material increase in substandard vehicular access;
  - j) Make sufficient provision for well-designed cycle storage, within a safe, accessible location. This should not result in the visual clutter of the frontage of the property or street scene and an adverse impact on the areas character;
  - k) Ensure that levels of external activity would not be detrimental to residential amenity and character; and
  - l) Demonstrates compliance with any relevant supporting guidance
3. Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
  4. Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused.
  5. The Council will also apply the above criteria to any proposals for the demolition and redevelopment of a larger home to provide 2 flats and the housing mix policy will apply to proposals will result in three (or more) residential units

#### **Reasonable Alternatives:**

##### **Option 1: Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).**

The existing policy generally permits proposals for the conversion of houses to multiple flats, provided they are well designed. The advantages of this are; it may increase the delivery of housing and help meet both the London Plan small sites and Local Plan housing target, as well as help demonstrate a five-year land supply of deliverable sites. Further, the potential impact on the character of the Borough is uncertain, as it could potentially spread them across the area or result in impacts being concentrated to a specific area. However to date this has not been identified as a significant problem.

The disadvantages of this approach are; it may result in the continued loss of family housing, which are required to address the future housing needs of the Borough. It is difficult to provide any family housing that is lost via conversions through new development elsewhere, as new residential developments may consist of high-density schemes close to/within town centres/stations. Further disadvantages are it may result in the loss of smaller sized, housing (i.e. below 130 sqm) that are more affordable and may result in the delivery of poorly designed flats. This approach is not considered the preferred option.

##### **Option 2: Policy should not include a minimum 130m<sup>2</sup> size threshold for the conversion/redevelopment of homes into flats.**

The advantages of this are; it may increase the delivery of a higher level of residential units, to help meet housing targets (including small sites) and ensure a five-year land supply of deliverable housing sites.

The disadvantages are; it may result in; a higher level of loss of family homes, specifically smaller, more affordable stock poorly designed homes, if smaller units below 130m<sup>2</sup> are converted. It may result in the delivery of a higher level of smaller 1/2 bed flats, even though there is a higher need to deliver family housing of 3 beds or more. It may potentially have a greater negative impact on the character of the area In terms of smaller original homes not being able to accommodate all the ancillary infrastructure (bins / cycle etc). This approach is not considered the preferred option..

**Option 3: 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.**

The potential effects of this policy may be similar to option 1. This approach is not considered the preferred option.

**Option 4: Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6**

The potential advantages of this are; it has the potential of increasing the amount of housing units delivered on , to meet the housing target and demonstrate a deliverable supply of housing sites to meet the five-year land supply.

The potential disadvantages of this are; it may result in the increased loss of family housing (.i.e. policy not only apply in PTAL 3-6) and as it may result in conversions in more locations of the Borough. This may have an uncertain impact on the character of the Borough, depending on whether more conversions are implemented within certain locations or not. This approach is not considered the preferred option.

**Option 5: The proposed housing conversions policy should not apply to demolitions of a larger family sized home.**

The points raised for option 2 above apply to this option. Overall, this is likely to result in the net loss of family housing. This approach is not considered the preferred option.

**Option 6: Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map**

The potential positive impacts of this approach are; it could provide clarity for all stakeholders in relation to which areas of the Borough are appropriate for housing conversions to flats; identify, assess the potential adverse impacts and sets out policy measures to address these.

The potential negative impacts of this are; it may be difficult to clearly identify, assess the areas where the conversion policy should apply (or not) and formulating evidence to support this may be a time-consuming exercise. There is a risk that this approach may be contrary to the London Plan Small Sites Policy that supports the incremental intensification of existing residential areas of existing residential areas. This approach is not considered the preferred option.

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

**Policy HO4: Genuinely affordable housing**– one reasonable alternatives identified.

**Targets**

- A. Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (E) below).
- B. Proposals for major residential and mixed-use development (10 units or more gross units) must demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing. Proposals must ensure an initial minimum of 35% of all gross residential development delivered within a scheme are affordable housing (and comply with criteria of Policy H5 C) to apply for the fast track route, as well as demonstrate all options have been explored to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites, will all be expected to deliver at least 50 per cent affordable housing on each site. Where a public sector land owner has an agreement with the Mayor to deliver at least 50 per cent across their portfolio of sites, then the 35 per cent threshold should apply to individual sites.
- C. The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered:
  - a. Their contribution to the Borough's strategic affordable housing target, subject to viability and application of the threshold approach.
  - b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing.
  - c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, in line with the table below.
  - d. Review mechanisms will be utilised to maximise the delivery of affordable housing on major developments.
- D. Development proposals will carry greater planning benefit ,where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan),
- E. Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.
- F. The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more dwelling units will be delivered taking into account of the following:
  - a. New residential units that are proposed which would result in an uplift in the overall number of units on the site;

- b. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites; and
- c. Exception to the above applies, if the applicant demonstrates ownership has changed and no relations with the original landowner/developer.

**Tenure mix (see tenure products definitions in Appendix 1)**

G. Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.

**Table: Identified needs by affordable housing tenure**

Tenure of housing	% required
Low cost rented (Social rented or as per London Plan)	70%
Intermediate: Shared Ownership and / or London Living Rent	30%
Total	100%

- H. The Council will prioritise the delivery of social rented housing over other affordable housing products as this is considered the most genuinely affordable and the most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix:
- a. The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing;
  - b. Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality;
  - c. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;
  - d. Evidence of meaningful discussions with Registered Providers which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing; and
  - e. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a



- I. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and allocated to those on the waiting list in accordance with a local eligibility criteria.
- J. The affordable housing Community-led housing scheme products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.

#### **Viability tested route**

- K. Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.

#### **Review Mechanisms**

- L. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance.

#### **Offsite contributions**

- M. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
  - a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and
  - b. where off-site provision is proposed:
    - i. A higher level of affordable housing can be secured through provision on an alternative site;
    - ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and
    - iii. The provision will better support inclusive and mixed communities.

#### **Vacant building Credit**

- N. The application of the Vacant Building Credit (VBC) will be supported, where applicants demonstrate compliance with the criteria below:
  - a. The building is not in use at the time the application is submitted;
  - b. The building is not covered by an extant or recently expired permission;
  - c. The site is not protected for an alternative land use; and

- d. The building has not been made vacant or abandoned for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.
- O. The affordable housing policy will apply to any net increase in the floor space of the vacant building.

**Mixed and inclusive communities.**

- P. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).
- Q. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be ‘tenure neutral’ in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces.

**Reasonable Alternatives:**

**Alternative 1: To put a greater emphasis on intermediate products.** The current split seeks to meet priority affordable needs as identified in the Draft Local Housing Needs Assessment (LHNA), but also allow for mixed communities by encouraging the provision of some intermediate products. The LHNA shows that intermediate products are essentially the least affordable of all the tenures to address the housing needs of local residents. Intermediate products are more likely to be occupied by people who have a choice within the market for alternative accommodation, e.g. market rent. Given the number of people who are homeless/ in temporary accommodation, living in overcrowded housing, an increase in intermediate proportions is not considered the preferred option.

**Policy HO5: Housing Estate renewal and regeneration** – two reasonable alternatives identified.

- 1. Development proposals involving the renewal and regeneration of the Borough’s Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor’s Good Practice Guide to Estate Regeneration. Proposals must ensure;
  - A. There is no net loss of affordable housing floorspace, and
    - a. replaces like for like tenure and size; or
    - b. meets the needs of returning residents (subject to a decant strategy); or
    - c. complies with the Council’s latest housing needs assessment; and
    - d. the demolition, , replacement of affordable housing follows the viability tested route and seeks to provide an uplift in additional affordable housing, in accordance with Policy H8 of the London Plan

- e. where developments seek to introduce market sale housing to enable the estate regeneration, any further uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan
  - B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6).
  - C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely : Affordable housing; prioritising the need to deliver additional social rented housing.
  - D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing
  - E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities.
  - F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land.
  - G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan.
  - H. Where a net loss of external amenity space is proposed, on a case by basis, consideration will be given in relation to;
    - a. The existing quantum/quality of external amenity space
    - b. Proposed quantum/quality of external amenity space
    - c. Other planning benefits arising as a result of the loss of external amenity space
  - I. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate
  - J. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living
  - K. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated
2. Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits.

3. Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan
4. The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate.
5. The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme

### **Reasonable Alternatives:**

#### **Alternative 1: Alternative approach would be no policy**

The NPPF / London Plan is silent on the some or all of the matters covered by the proposed Local Plan policy, meaning there would be limited guidance to determine planning applications against, impacting upon the effectiveness of the Plan. This approach is not considered the preferred option.

#### **Alternative 2: Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).**

There is a deficiency in accessible open space (external amenity space) within certain parts of the Borough. Many of the Borough estates include designated open space and proposals should seek to ensure, there is no net loss in existing open space provision and where possible seek to meet any standards in relation to the quantity and quantity of provisions. But the potential policy option of ensuring no net loss in existing open space provision (.i.e. no flexibility based on compliance with a criteria) may have adverse impact on the delivery of a higher quality provision, with a range of recreational facilities and the delivery of other planning benefits (e.g. addressing priority housing needs, community needs), as well as may have some impact on the design quality of the scheme and in rare instances the potential deliverability of schemes (.e.g. lower housing output). Due to these factors, option 2 was not considered the preferred option.

#### **Policy HO6: Accommodation for older people**– three reasonable alternatives identified.

1. Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will be supported where:
  - a. It is demonstrated they would meet an identified local need, particularly to enable older people to live independently
  - b. It would deliver specialist older people accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation
  - c. Affordable housing is provided in line with Policy HO5
  - d. it has adequately considered and addressed all design issues in Part 2 or Part 3;
  - e. it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement;

- f. It is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers
  - g. it contributes to mixed and balanced communities.
  - h. It considers and responds positively to the objectives, priorities of the Council's housing and commissioning strategies
2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate the design issues below have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- a. The proposal is for provision of self-contained units which address requirements for private internal space;
  - b. There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.
  - c. Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - d. There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - e. Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - f. Appropriate wheelchair accessibility is provided. At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
  - g. A higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards will be required for specialist older person accommodation products that seek to address the needs of those aged 65+. This will be determined on a site-by-site basis based on factors such as the need to optimise output, viability, site size and other constraints.
  - h. Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities.
  - i. The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community
  - j. Demonstrate how the range of type of units and their design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies
  - k. Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles

- i. Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings<sup>1</sup>
3. Care homes must demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- a. There is an appropriate balance of private residential space and ancillary space associated with the care required for the use
  - b. There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - c. 100% of all habitable and multi-purpose space used by visiting healthcare or other professionals are wheelchair accessible;
  - d. Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission;
  - e. Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off; in line with Policy M2;
  - f. Provision of accessible communal outdoor space including a sensory garden for those who suffer from dementia for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
  - g. Adequate level and range of care facilities and support, communal areas/facilities (.i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site
4. The Council will resist development proposals which involves the loss of floorspace in specialist older peoples and care home accommodation unless:
- a. It can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow.; or
  - b. adequate replacement on-site accommodation will be provided that satisfies Part 2 or Part 3 or
  - c. adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 2 or Part 3; or
  - d. It can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose

### **Reasonable Alternatives:**

#### **Alternative 1: Continue existing Local Plan policy approach (DM 29)**

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. Applying this option is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, tenure older person accommodation, with a sufficient level of care/support, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

#### **Alternative 2: Support proposals within/edge of town centres (excluding neighbourhood centres)**

This approach is not considered the preferred option, as some of the town centres have a low public transport accessibility rating score, particularly those located to the north of the Borough. Therefore, although older residents may be able to access local services facilities, there is a potential risk this option may result in poor access to public transport and result in social isolation of older people from friends, families or experience difficulties accessing essential services like health care.

**Alternative 3: Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period**

This approach is not considered the preferred option, as the Draft Local Housing Needs Assessment indicates that the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information, in addition to the indicative benchmark figure for older people accommodation (within C3 use) included within the former policy. Further, the Plan seeks address older people accommodation needs primarily via the delivery of conventional C3 housing that are well designed to meet the changing needs of the occupants throughout the lives. There is a risk that the potential inclusion of a higher target for older people accommodation may undermine the Council's ability to meet other priority housing needs such as family housing and affordable housing.

**Policy HO7: Supported and sheltered housing** – one reasonable alternatives identified.

1. The Council will support proposals for the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups of the population; providing;
  - a) It is demonstrated the scheme will adequately address a specific local need
  - b) it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence,
  - c) It provides the necessary level of supervision, management and care/support, security and community safety (where necessary)
  - d) it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
  - e) Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted towards
  - f) Proposals must consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies
  - g) It contributes to creation of balanced, mixed and inclusive communities and would not result in the over concentration of supported and sheltered housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area.
  - h) It complies with other relevant policies within the Development Plan
2. The Council will resist the loss of supported and sheltered housing unless:
  - i. adequate replacement accommodation of the same quality and quantity will be provided for the particular group; or
  - ii. it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and
  - iii. it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard



## **Reasonable Alternatives:**

### **Alternative 1: Continue existing Local Plan policy approach (DM 29)**

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. This approach is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, accommodation, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, with adequate level of care/support to cater for the needs of vulnerable individuals/groups and are well located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

**Policy HO8: Purpose built student accommodation**– two reasonable alternatives identified.

1. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation (PBSA) will be supported providing:
  - a. It is demonstrated there is a local or strategic need for the proposal
  - b. Proposals for PBSA must be appropriately located:
    - i. on well-connected sites that are easy to access by walking, cycling and public transport;
    - ii. Within or at the edge (300m) of town centres<sup>1</sup>, which benefit from good provision of shops, services, leisure and community facilities appropriate to the student population,
    - iii. Priority is given to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions
  - c. The majority of the bedrooms in the accommodation are secured for use by students over the lifetime of the PBSA, via a nomination agreement with one or more specific higher education provider (HEP). This evidence must include confirmation the proposed rental levels for PBSA are supported by the linked HEP(s)
  - d. A range of accommodation types, including cluster flats with shared kitchen and bathroom facilities, unless it is demonstrated this would be inappropriate
  - f. It is well-designed, providing appropriate space standards and facilities and it is sustainable by virtue of being adaptable to alternative residential use or other appropriate town centre uses. A satisfactory site management and maintenance plan (secured by planning condition) covering the lifetime of the accommodation is agreed by the Council, to demonstrate an acceptable level of amenity and access to facilities for its occupiers and not give rise to unacceptable impacts on the amenities of the occupants of the accommodations and existing residents, neighbouring uses in the surrounding areas.
  - g. The level of PBSA proposals (individually or cumulatively) in a location should not;
    - i) result in the harmful overconcentration of PBSA within a given location and undermine mixed and inclusive neighbourhoods. This will have regard to the character of the area, mix of uses, potential impacts on neighbouring properties and residents within the surrounding area.
    - ii) compromise the delivery of conventional self-contained housing, particularly family and affordable housing to meet the Borough needs, in line with Strategic Policy HO3:
  - h. The maximum level accommodation is secured as affordable student accommodation on-site in line with Policy H15.
2. Proposals for any potential ancillary or temporary use of the accommodation during vacation periods should be designed at the outset of the scheme and should ensure;
  - i. There is no adverse impacts or risks to the safety, welfare and amenities of the existing students and staff occupying the student accommodation, in compliance with any FE or Council policy/regulations
  - ii. There are adequate design measures to limit/restrict the movement of occupants of the PBSA, temporary /ancillary uses and distinguish between the permanent use

- iii. There is not an over concentration of similar uses, which can impact the balance and mix of uses that can result in potential harmful amenity impacts
3. The loss of existing PBSA will be resisted unless it is demonstrated:
- (a) It no longer caters for current or future needs,
  - (b) It is unsuitable and unviable for operating within the existing use;
  - (c) the floorspace is replaced by another form of residential accommodation that meets other priority Local Plan housing requirements
  - (d) Exception to the above is if the scheme is proposing to replace an existing accommodation with equivalent floor space that meets modern standards.

**Reasonable Alternatives:**

**Alternative 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policy for determining proposals. This will give the Council less control to promote good design, ensure development is located within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

**Alternative 2: Allow PBSA schemes within accessible locations with PTAL 3-6**

This approach is not considered the preferred option, as PBSA tend to be large scale and may adversely impact the character of residential areas. It may result in the loss of family sized housing areas, if clusters of student accommodation occur in areas where PBSA scheme is located/close to it and may result in other harmful amenity impacts on neighbouring properties.

**Policy HO9: Large Scale purpose built shared living**– four reasonable alternatives identified.

1. Proposals for large-scale purpose-built shared living (LSPBSL) will be supported where they comply with London Plan Policy H16 and the following requirements:

a. Proposal will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough

b. Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,

c. Proposals should be located within the boundary of Harrow and Wealdstone Opportunity Area

d. There must not be two LSPBSL schemes within a 250m walking distance of each other, to; avoid an over-concentration of similar uses, unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses.

e. The LSPBSL scheme should not have a detrimental impact to;

i) Residential amenity of the neighbouring properties and surrounding area

ii) The character of the area

iii) The need to support and maintain mixed and inclusive communities

f. Proposal on sites with extant permission or allocated for self-contained dwellings will not be supported, to avoid compromise the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues

g. The ground floor of the scheme should be designed and located to be active street frontage or public realm. It should provide;

i) Flexible workspaces,

ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are suitable for its location. These should be accessible to the wider public, to integrate it into the surroundings area, to support inclusive and sustainable communities.

h. To support a circular economy, proposals must demonstrate a flexible design and layout, to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses (where appropriate) without the need for demolition and rebuild

i) Proposal must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies

j) The applicant must provide a management plan , to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL . This will be secured by way of a S106 agreement.

2. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)

3. Affordable housing contributions will be required, in accordance with London Plan Policy H16

4. The Council will resist any proposals that seek to reduce the quantity, type or access of amenity provisions included within LSPBSL, after permission has been granted.

#### **Reasonable Alternatives:**

**Alternative 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policies for determining proposals. This will give the Council less control to promote development within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

#### **Alternative 2: Do not require applicants to demonstrate a need for LSPBSL**

Although, this approach may provide developers with more scope to determine the type of housing products that should be provided on their site to address a perceived demand in the local housing market, but it will provide less of an incentive to ensure a local housing need is being addressed. Conversely, it will make it more difficult for the Council to require developers to ensure their scheme is addressing the priority needs of the area, which are conventional self-contained C3 housing, particularly affordable housing and family sized dwellings. Further, LSPBSL products tend to be less affordable than other products in the private rental sector and there is uncertainty on the extent to which it may help other issues such as overcrowded housing, under-occupation and freeing up the stock of family sized housing (e.g. properties in HMOs). The NPPF requires Plans to boost the supply of housing of the right, types, size, tenure in order to address the needs of groups with specific housing requirements (para 60, 62). This approach is not considered the preferred option.

#### **Alternative 3: 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**

This approach is not considered the preferred option, even though there are small parts of other town centres within the Borough fall within PTAL 5-6 and Edgware is a Major Town centre. The key reasons are LSPBSL schemes need to be built at a high density, with more than four to five storey height, in order to provide a sufficient quantity of communal facilities, manage/maintain the property at a satisfactory level and maintain viability of it. Whilst the character of the Borough comprises of two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs. This means significant parts of the Borough are unlikely to be suitable for LSPBSL schemes due to the potential impact on the character of the area and the need for economies of scale to apply to ensure viability.

#### **Alternative 4: Do not include distance test for assessing over concentration of LSPBSL**

This approach is not considered the preferred option, as it will make it more difficult to assess, prevent the potential over concentration of the LSPBSL schemes within a given locality, as well as minimise any potential related impacts on residential amenities, the diversity and mixed of uses and the objective of promoting mixed and inclusive communities. A related issue is that this option may undermine the delivery of conventional self-contained residential accommodation and address the priority local housing needs (.i.e. family sized dwellings, affordable housing). However, the policy includes some flexibility to consider proposals that may be contrary to this requirement, in exceptional circumstances

**Policy HO10: Housing with shared facilities (Houses in Multiple Occupation) – four reasonable alternatives identified.**

Development proposals for Houses in Multiple Occupation (HMO)<sup>1/</sup> and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply criteria below:

1. The internal floor area of the dwelling should exceed 130m<sup>2</sup> (as originally built)
2. It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities.
3. It should not be located within a residential street or area that is characterised by family housing
4. There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area.
5. Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas.
6. It is well-designed, high quality accommodation with rooms of an adequate size for their purpose, having regard to internal space standards (set out in the London Plan and supporting guidance) with adequate functional living spaces and layout.
7. Ensure an adequate level and type of ancillary facilities such as kitchen areas, WC's, storage space and communal areas for lounging, dining are provided to address the daily needs for the proposed number of occupants
8. Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape.
9. It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise.
10. It ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene.
11. Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.
12. It contributes to creating an inclusive community and would not result in the over concentration of HMOs/Hostels within a neighbourhood that would harm the mix, balance and well-being of communities. For HMOs, an over concentration is defined as an instance where three or more of the nearest ten properties are HMOs,(i.e. 5 on each side of an application site, on the same side of the highway).
13. The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members of the community, unless
  - a) It is demonstrated there is no local need for the type of accommodation.
  - b) It is for a replacement provision at an equivalent or better standard
  - c) It is demonstrated to be unviable or unsuitable for addressing the needs of its users.

- d) The replacement provision is addressing a more acute local need (e.g. affordable housing)

#### **Large Purpose-built HMO developments**

14. The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the best approach to meeting housing needs in the borough, and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must:
- a. Be located within an accessible location to local facilities, services, transport in accordance with criteria 1
  - b. not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria 2 above .
  - c. prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area ( in accordance with criteria 3). A sufficient evidence – including a detailed management plan – must be provided demonstrate this.
  - d. Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-9 above
  - e. A sufficient level, type, of communal facilities and spaces should be provided to adequately address the needs of the expected level of number occupants. These should not be located in too few locations, conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents, to foster friendships and a sense of community.
  - f. Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria 12.

#### **Reasonable Alternatives:**

##### **Alternative 1: Continue to apply existing policy (DM30)**

The adopted Local Plan Development Management (2013) Policy DM 30 is considered highly permissive for HMO/hostel proposals. It includes a generic criterion requiring proposals to demonstrate; good accessibility to local facilities, compliance with accessible homes standards and satisfactory living conditions and no adverse amenity impacts. Although this option may help in providing a relatively affordable stock of accommodation the continued use of this is considered inappropriate. The key reasons are; it is open to wide interpretation by all stakeholders and does not reflect the most up to date evidence of need. Further, the use of this will make it difficult for the Council to prevent the overconcentration of HMO's and the potential harmful amenity impacts of these, as well as encourage well designed living environments for residents , prevent the loss of family housing and ensure HMOs are located within the most accessible locations. This approach is not considered the preferred option.

##### **Alternative 2: Allow conversion of family houses to HMOs (.i.e. no consideration of the houses internal floor area (130m2) and the character of the area)**

This approach is not considered the preferred option, as it will result in the potential loss housing that is suitable for families, including the stock of smaller housing that may be more affordable for low income or younger households. It is difficult to replace the loss of family sized housing due to the type, location of sites that are likely to come forward for development. Further, the change of use of smaller housing (below 130) may result in a poorly designed living environment for the HMO occupants.

**Alternative 3: Allow HMOS within accessible locations with a PTAL 3-6**

This approach is not considered the preferred option, as this may have an adverse impact on the character and harm the amenities of areas characterised by family housing, as well as increase the potential loss of family housing.

**Alternative 4: Do not include a specific measure to assess the over concentration of HMO's**

This approach is not considered the preferred option, as it won't allow the Council to assess or prevent the potential over concentration of the HMOS schemes within an area, as well as minimise any potential cumulative related impacts on residential amenities, and achieve mixed and inclusive communities. A related issue is that this may reduce the stock of family sized housing accommodation, which is difficult to provide via new development, which tends to be high density due to location of previously developed sites (.i.e. close to town centres) and their high land values. This may result in families residing in unsuitable, overcrowded accommodation or in poor locations that are at a distance from their social networks and local services/facilities (.i.e. schools).

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

**Policy HO12: Gypsy and traveller accommodation**– two reasonable alternatives identified.

- 1) The Council seek to retain the existing Gypsy and Traveller site, at Watling Farm (1.07ha) to provide up to 12 additional pitches, to address future traveller needs between 2022-32;
- 2) The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout, design and contribute to meeting identified local needs and there is no capacity at the existing site at Watling Farm.
- 3) Proposals for new and replacement accommodation must make adequate provision for:
  - a. A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles
  - b. Satisfactory access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services
  - c. basic amenities, including as running water, sewerage/ drainage and waste management
  - d. A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health, public transport
  - e. Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas
  - f. Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.



- g. Measures to minimise any potential impacts on the local environment, including any relevant policy designations for or adjacent to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations
- 4) Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a sites,
- 5) Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties

### **Reasonable Alternatives:**

#### **Alternative 1: No policy**

This approach is not considered the preferred option, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Traveller Sites. This would also mean that the Council would be less able to manage new accommodation as planning applications would be judged against national planning policy rather than locally specific policy criteria.

**Alternative 2: Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015)**

## **Chapter 05: Local Economy**

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

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

**Policy LE1 Development Principles & Town Centre Hierarchy**– one reasonable alternative identified.

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.

- A. The Council will support town centre developments that:
  - a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade;
  - b. Are of a scale and intensity commensurate to the size and role of the centre or parade it is located within;
  - c. Provide an appropriate mix of uses within a shopping area or parade, ensuring an over proliferation of Sui Generis uses does not occur;
  - d. The ground floor would have an accessible and active frontage; and e. Community facilities in town centres are able to be supported by the Council where compliant with Policy CI1.
- B. The Council will support mixed-use developments in town centres and parades where:
  - a. The ground floor element complies with A;
  - b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between the two uses; and
  - c. There is satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)).
- C. Residential uses on the ground floor in any town centres or neighbourhood parades will not be supported.
- D. The loss of appropriate town centre uses, community facilities and infrastructure from town centres will not be supported unless compliance with policy CI1 is demonstrated.
- E. Temporary events such as markets and entertainment uses will be supported where:
  - a) They are supported with a management plan agreed by the Council; and
  - b) They do not impact on residential amenity or highway safety.
- F. The Council will resist the loss of any employment, leisure (excluding Sports and Recreation) or cultural uses within a neighbourhood parade that provides essential day to day amenities. The loss of such uses will only be accepted where 24 months of satisfactory marketing has been undertaken.
- G. Proposals for new retail and leisure development in out of centre locations will be resisted. Any such out of centre developments must:
  - a. Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites;
  - b. Be supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment;

- c) Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network;
  - d) for a leisure use demonstrate that it is located within an identified area of deficiency or an identified area for future need.
- H. The release of office floorspace will be supported where the sequential approach below has been applied in the following order:
- c. Vacant floorspace outside of designated town centres;
  - d. Vacant floorspace within designated Major, District or Local Town Centres;
  - e. Poor quality floorspace within designated Major, District or Local Town Centres; and
  - f. Floorspace within the Harrow Metropolitan Town Centre.

H.1. Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12-month period for office use or other appropriate employment or community uses.

**Alternative 1: Less restrictive policy.** An alternative policy for LE1 could be a 'laissez-faire' approach, which would be not seek to control or protect main town centre uses, rather leaving the market to determine the appropriate mix is uses within the town centres. However, failing to manage and ensure appropriate main town centre uses may detrimentally impact on the vitality and vibrancy of town centres, which is one of the key outcomes sought by the Local Plan. Such approach is therefore not the preferred option. An alternative that was considered was for Policy LE1 to seek to provide a more restrictive approach to town centre uses (than that proposed), similar to the current local plan policy, requiring a percentage cap of non-retail uses within the town centres / shopping parades. This could also include ensuring that there would not be more than three non-retail units in a row. However, by reason of the introduction of new Use Class Order (September 2020) and the new E Use Class incorporated a number of previously separate use classes there is a much wider number of uses that are able to changed from retail, without the need for planning permission (ie; does not constitute development and therefore any restrictive policy would not apply). As such, seeking to control the proportion of specific uses in town centres (rather than the preferred approach of focusing on outcomes such as the contribution of a proposal (where permission is required) to vibrancy and vitality would not be deliverable within a local plan policy. This is therefore not a reasonable alternative.

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

**Policy LE3 Industrial Land** – two reasonable alternatives identified.

The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan.

**A. Strategic Industrial Locations (SIL)**

- a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below;
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates
  - 4) Utilities infrastructure (such as energy and water)
  - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the wider SIL.
- c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
- d. Any net loss of industrial floorspace and premises within a SIL will not be supported, and
- e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.

A1. Co-location of residential within a SIL will not be supported.

**B. Locally Significant Industrial Sites (LSIS)**

- a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below;
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates
  - 4) Utilities infrastructure (such as energy and water)
  - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure

- 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the LSIS.
  - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
  - d. Any net loss of industrial floorspace and premises within a LSIS will not be supported;
  - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- B.1 Co-location of residential within a LSIS will not be supported.
- C. Non-designated Industrial Land**
- a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan;
  - b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.
- D. Non-industrial uses on industrial land.**
- a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development.
  - b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.

**Alternative 1 – allow for the full range of appropriate industrial uses:** An alternative policy could be to allow for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites. By reason of the limited industrial floorspace within LB Harrow, such an approach is not the preferred option as this would mean uses that could occur elsewhere in the borough without adverse impacts would instead occur on the borough’s limited amount of industrial land, at the opportunity cost of industrial uses that are more appropriately located on designated industrial land.

**Alternative 2 – allow for co-location:** An alternative policy approach may be to allow for the co-location of housing on Local Strategic Industrial Sites, which is set out as appropriate (subject to process) within the London Plan (2021). By reason of the limited industrial

floorspace within LB Harrow, which evidence suggests stock should be maintained to ensure a sufficient amount, and the forecasted ability to meet housing targets without requiring such an option. Co-location of residential within a LSIS will only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority.

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

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

## **Chapter 06: Community Infrastructure**

**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.

## **Chapter 07: Green Infrastructure**

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

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

**Policy GI2: Open Space** – one reasonable alternatives identified

- A. Development proposals must:
- a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space, particularly in areas of deficiency;
  - b. Not result in the net-loss of publicly accessible open space;
  - c. Improve access to green space where appropriate, including natural green space, particularly in areas where deficiencies in access have been identified; and
  - d. Enhance biodiversity and improve access to biodiversity and natural capital.
- B. Major development proposals must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required.
- C. Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless:
- a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
  - b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
  - c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
  - d. The proposal is for a small ancillary use (maintenance shed, food & beverage, changing rooms) that would enhance the useability of the space and surrounds, or
  - e. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.

**Alternative 1: More restrictive policy**

One reasonable alternative to this policy is proposed. This policy specifies that Open Space could be used for the development of community infrastructure in exceptional circumstances. A reasonable alternative would be to make this policy more restrictive, removing this specification and not allowing development of community infrastructure on Open Space land. This alternative would however potentially impact upon the provision of community infrastructure required to support development and the ability for the LPA to consider the overall planning balance for individual community infrastructure proposals impacting upon open space.

**Policy GI3: Biodiversity** – one reasonable alternative identified

Protection of Biodiversity & Natural Capital

A) Biodiversity and natural capital must be protected, enhanced, extended and connected. Development proposals must contain a biodiversity plan including an appropriate biodiversity net gain metric, a Preliminary Ecological Assessment (where appropriate) and an on and offsite mitigation and management plan unless exempt under the Environment Act 2021.

B) The Ecological Mitigation Hierarchy, to avoid impact, mitigate, and as a last resort compensate must be followed when considering habitats and protected and priority species.

C) Development proposals must not result in loss of, or pose direct or indirect negative impacts to:

- a) Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees)
- b) Sites nationally or internationally designated for nature conservation or geodiversity
- c) Sites of Importance for Nature Conservation/ Regionally Important Geological Sites
- d) Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire
- e) Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to:
  - i. LNRS areas;
  - ii. Areas of priority habitat;
  - iii. Important features (e.g. historic hedgerows).
  - iv. Green or blue corridors or other functional linkages within the local ecological network; and
  - v. Ecosystem function or resilience.

D) All proposals must consider the presence of protected and priority species and submit up to date surveys where appropriate and appropriate mitigation strategies for their continued protection, within the site if at all possible.

E) Development proposals that would increase deficiencies in access to nature will be resisted.

Biodiversity and nature recovery

F) Development proposals should:

- a. Conserve, enhance, extend and connect Harrow's biodiversity;
- b. Utilise nature-based solutions to manage environmental pressures;
- c. Strengthen the Borough's natural capital;
- d. Improve access to nature where this does not impact important habitats and species.



- A. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:
- a. A minimum of 2 biodiversity units per hectare;
  - b. A minimum net uplift in biodiversity unit value of 15%;
  - c. A minimum of one biodiversity enhancement per dwelling; and
  - d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).

### **Alternative 1: Align with the Environment Act**

One reasonable alternative to this policy is proposed. This policy requires a Biodiversity Net Gain of 20%. A reasonable alternative would be to align with the Environment Act and stipulate that a Biodiversity Net Gain of only 10% is required, this is the status quo for all local authorities. 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.

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

## Chapter 08: Climate and Nature

### Strategic Policy 08: Responding to the Climate and Nature Emergency – no reasonable

#### Policy CN1: Sustainable Design and Retrofitting – one reasonable alternative identified

##### New Buildings

- A. 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.
- B. All new buildings must minimise the use of mains water achieving a maximum consumption of 105 litres per head per day, excluding allowance of up to five litres for external water consumption.
- C. All new buildings should meet the following standards:

##### Space Heating Demand

- a) All dwellings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr; and
- b) All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr;

##### Energy Use Intensity (EUI)

- c) Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m<sup>2</sup>GIA/yr;
- d) Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:

BUILDING TYPOLOGY	EUI STANDARD
Student or keyworker accommodation, care homes, extra care homes	35 kWh/m <sup>2</sup> GIA/yr
Warehouses and light industrial units	35 kWh/m <sup>2</sup> GIA/yr
Schools	65 kWh/m <sup>2</sup> GIA/yr
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr
Hotels	160 kWh/m <sup>2</sup> GIA/yr

#### Offsetting (as last resort)

- e) Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.

#### Retrofit of Existing Buildings

- D. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use.
- E. Development proposals for major residential domestic refurbishment must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme<sup>1</sup>. or future equivalent, unless it can be demonstrated that it is not feasible.
- F. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible.
- G. Development proposals for the refurbishment or retrofit of all buildings should achieve a certified 'Excellent' rating for 'Wat01' or future equivalent, unless it can be demonstrated that it is not feasible.
- H. Proposals for retrofit of existing buildings must consider impacts on the historic environment, and amenity of the building's users and neighbours. Historic England guidelines should be considered when retrofitting older buildings.

### **Alternative 1: Development size threshold**

The policy outlined above applies to all new buildings, with reasonable exclusions for outbuildings. An alternative policy would have an option that just focusses on major applications / development proposals, (i.e 10+ units) or the small site threshold (sites less than 0.25 ha in size). This option has not been pursued as it would likely undermine the strategic intent of the policy for all buildings to meet net zero standards, particularly for smaller housing developments of 9 units or less. If this option were pursued, smaller developments would need to demonstrate that they have aimed to make buildings as close to net zero as possible, within the limits of viability. As Harrow is likely to experience significant incremental development outside of the opportunity area (reflected by the indicative small sites target in the London Plan being a significant proportion of the overarching housing target for Harrow), many buildings in the suburban areas would not be required to be net zero, which would be a missed opportunity to minimise carbon emissions and future proof the borough's buildings.

### **Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations**

Outlined below is an alternative option for the Sustainable Design Policy, based on a continuation of the approach of using Part L of the Building Regulations to define and measure carbon / net zero.

**POLICY OPTION 1 – Part L, Building Regulations (not the preferred option):**

All developments must achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions.

#### **On-site carbon reduction**

All developments must reduce carbon emissions on-site as much as possible. In terms of regulated emissions, the minimum level of on-site performance required is:

- Domestic buildings: 65% better than Part L 2021
- Office buildings: 25% better than Part L 2021
- School buildings: 35% better than Part L 2021
- Industrial buildings: 45% better than Part L 2021
- Hotel: 10% better than Part L 2021
- Other non-domestic buildings: 35% better than Part L 2021 (tbc)

Buildings must also comply with the other requirements of the Building Regulation Part L 2021, e.g. Fabric Energy Efficiency criterion for domestic buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.

Applicants must undertake Part L 2021 modelling to demonstrate compliance.

Unregulated emissions must also be reduced as much as possible.

#### **Carbon offsetting**

On-site carbon reductions should be maximised as far as possible before any remaining emissions are offset. If the Council is satisfied that the development has maximised on-site reductions, but the development is still short of achieving Net Zero Carbon, the developer is expected to make a cash-in-lieu contribution to the Council's carbon offsetting fund at a price of **£880/tCO<sub>2</sub>** per year over a period of 30 years in order to offset any remaining carbon emissions and achieve net zero carbon.

**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.

## **Chapter 09: Managing Waste and Supporting the Circular Economy**

**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.

## **Chapter 10: Transport and Movement**

**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



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