



London Borough Harrow Council Local Plan Integrated Impact Assessment

Integrated Impact Assessment Non-Technical Report

London Borough Harrow Council

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Basis of Report

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Acronyms and Abbreviations

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



LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents.
Local Plan	The Local Plan forms part of the statutory development plan for the Borough and informs decisions on planning applications.
NPPF (National Planning Policy Framework)	Published in March 2021, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. . The NPPF is supported by the National Planning Practice Guidance (NPPG).
Proposals/Policies Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents.
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.



1 Introduction

1.1 This report

This Non-Technical Summary (NTS) summarises the findings of the Integrated Impact Assessment (IIA) of the draft Local Plan for the London Borough of Harrow (referred to in this report as the draft Local Plan). SLR Consulting Ltd were commissioned by London Borough of Harrow Council (LBHC) to undertake the IIA of the draft Local Plan to help integrate sustainable development into the Local Plan and to meet legal requirements.

IIA includes Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulations Assessment (HRA):

- SA: identifies the potential social, environmental and economic effects of the plan;
- SEA: identifies the potential environmental and some social effects (including health) of the plan and involves specific legal requirements relating to consultation and reporting;
- HRA: required by legislation to consider the potential for likely significant effects to occur on important designated Habitats Sites and to put in place measures to avoid adverse effects;
- EqIA: required to meet the requirements placed on LBHC by the Equality Act. Requires consideration of how “protected characteristics¹” could be impacted by the plan having due regard to the need to eliminate discrimination; and
- HIA: encouraged by planning policy and the London Plan 2021. Requires consideration of the potential effects of the plan on health.

As there is overlap between the types of assessment listed above, one IIA can be undertaken to assess the significant environmental, social and economic effects of the Local Plan. The IIA will assess the Local Plan and “reasonable” alternatives to the Plan’s strategy, policies and proposals, and will identify the reasons for discounting alternatives.

HRA follows a slightly different process compared to the other assessments listed above and is driven by specific legislation. The HRA of the Local Plan is currently

¹ age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender (male/female), sexual orientation



integrated with the other assessments but may require separate reporting at a later stage.

1.1 How to comment

The consultation period will be eight weeks from 26th February until 25th April 2024. Your views on this IIA Report are welcomed. A series of questions are set out below in order to guide responses.

Questions to guide responses:

1. Do you agree with the assessment methodology used?
2. Do you agree that all of the reasonable alternatives have been identified?
3. Do you agree that the potential significant effects identified in the assessment and the alternative options are correct?
4. Do you agree with the proposed mitigation?
5. Do you have any other comments regarding the IIA?

How to comment:

PLEASE PROVIDE RESPONSES BY 25TH APRIL 2024 TO PLANNING POLICY TEAM via the email address below:

LOCALPLAN@HARROW.GOV.UK

2 The draft Local Plan

The London Borough of Harrow is preparing a Local Plan for the area, to manage the future development and growth of the area between 2021 and 2041. This is intended to replace the Core Strategy (adopted 2012); Development Management Local Plan (2013); Harrow and Wealdstone Area Action Plan (2013) and Site Allocations Local Plan (2013) document and associated Policies Map; and, potentially, existing Supplementary Planning Documents (SPDs). The draft Local Plan will be produced in general conformity with the London Plan (2021). It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

One of the key requirements for producing a draft Local Plan will be to identify sufficient land for housing, economic development and other uses to meet the identified needs of the Borough, whilst at the same time ensuring that such land can be readily brought forward for development, including to enable LBHC to demonstrate a five-year supply of deliverable housing sites. Provision for future housing and employment growth will be made in conformity with the London Plan (2021). In addition, the plan will include policies to determine applications for development



proposals (and change of use) to ensure; new/enhanced infrastructure (i.e. healthcare facilities, schools, community facilities) is delivered; deliver affordable housing, encourage good design; protect, enhance the natural (i.e. Green belt, Metropolitan Open Land (MOL), built, and historic environment, as well as address the causes and impacts of climate change, in order to promote the sustainable development.

As set out in The London Plan (2021), Harrow Borough is expected to deliver a minimum of 8,020 homes in the period 2019-2029. 3,750 of these are to be delivered on small sites (below 0.25 hectares in size)². LBHC have undertaken a Local Housing Needs Assessment and are proposing to roll forward the London Plan 10 year housing delivery (8,020) and include a housing requirement/target 16,040 within the Local Plan, during the Plan period (2021-41). 3,750 of these are to be delivered on small sites (below 0.25 hectares in size)³. LBHC have undertaken a Local Housing Needs Assessment and are proposing to roll forward the London Plan 10 year housing delivery (8,020) and include a housing requirement/target 16,040 within the Local Plan, during the Plan period (2021-41). The Council are in the process of undertaking further evidence to assess the capacity of potential housing sites and other sources of supply to fully address the proposed housing requirement of 16,040 homes. The details of the findings of this work, including proposed housing allocations will be included within the Local Plan (Regulation 19) consultation document, during the next stage of the plan making process.

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

London Borough of Harrow Council, along with neighbouring London Authorities, have agreed to meet the London Plan housing requirement in full. Hertfordshire authorities

² The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 14/07/23)

³ The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 14/07/23)



to the north are requesting London Boroughs to meet their unmet needs but they still have to demonstrate they have explored all options to fully accommodate their needs within their administrative boundaries. At present there are no neighbourhood plans being progressed in Harrow.

The Local Plan preparation has reached the Regulation 18 stage. The draft Local Plan contains preferred policies. Site allocation options will be considered following consultation on this version of the draft Local Plan and another version (the Regulation 19 version) will be prepared and consulted on before it is submitted for Examination by an Inspector.

The draft Local Plan contains strategic objectives covering local identity, infrastructure, transport, air quality, open space, biodiversity, climate emergency, waste and recycling, housing, affordable housing, housing types, mixed and inclusive communities, local economies and town centres.

2.1 Overview of the Plan area

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

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

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



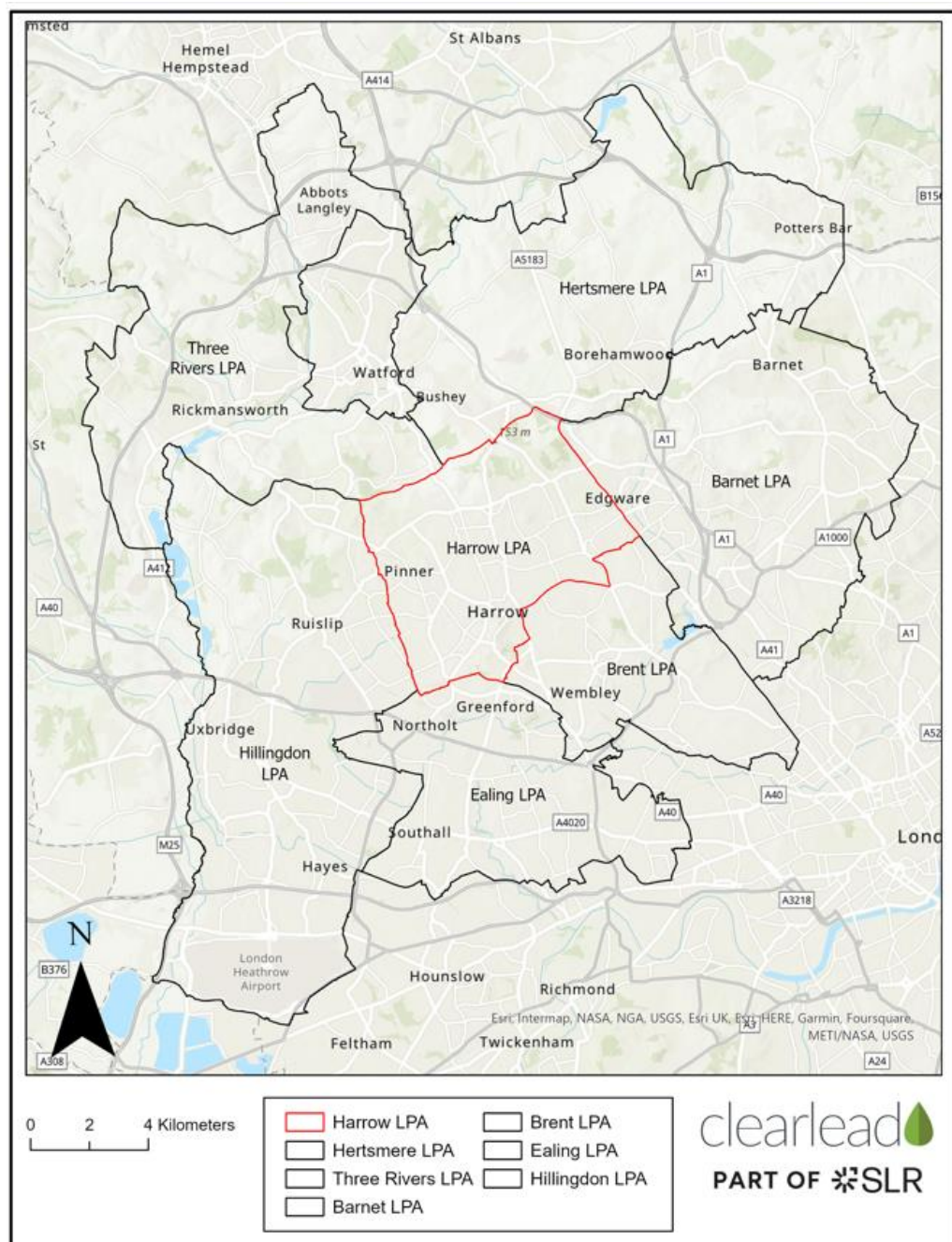


Figure NTS.1: Harrow, and its surrounding Local Planning Authorities



3 How the Plan and its alternatives were assessed

3.1 Assessment methodology

IIA is a staged process that runs alongside the plan making process. The stages in IIA are:

- Stage A setting the scope of the appraisal;
- Stage B testing the sustainability of the plan and its alternatives, identifying ways to mitigate (offset) potential negative effects and develop proposals for monitoring;
- Stage C documenting the process in the IIA Report;
- Stage D consulting on the plan and IIA Report; and
- Stage E post-adoption reporting and monitoring the effects of the plan.

This IIA Report covers Stages B and C of the IIA process, and the draft Local Plan is at the Regulation 18 stage of the plan-making process.

During Stage A, data about the Borough and the context in which the plan is being prepared was collated in a IIA Scoping Report in order to identify the key issues within the Borough and they could be affected by the draft Local Plan. The IIA Scoping Report was consulted on with the statutory consultees (Natural England, the Environment Agency and Historic England, as well as key local stakeholders) in October / November 2023. The information was amended in response to comments received and the final output of stage A is a framework of objectives and assessment questions against which the Local Plan and its reasonable alternatives can be tested. The IIA Framework can be seen in Table NTS.1. Table NTS.2 shows which of the IIA objectives relate to the constituent assessments and therefore how they have been integrated into the IIA.

Preferred policies and reasonable alternatives were provided to SLR in December 2023 / January 2024 for assessment. Assessment involves identifying the significant environmental effects of the Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and presenting the findings within an IIA Report. All Local Plan policies have been assessed against the IIA Framework and reference has been made to the data about the area and key sustainability issues in the Borough identified during the scoping stage. The findings of the assessments are presented within Section 5.



Table NTS.1: The IIA Framework		
IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Economy and Employment	IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	<ul style="list-style-type: none"> • support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development? • support the provision of world class infrastructure and connectivity? • support flexible working practices? • protect and retain an adequate supply of employment floor space to address business needs? • enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use? • safeguard existing town centres? • maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment? • improve existing shopping facilities within town centres and neighbourhood parades? • support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space? • support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?
	IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	<ul style="list-style-type: none"> • create new jobs in high value sectors, including in the green sector? • encourage developers to demonstrate how they are investing in skills and employing local people?



Table NTS.1: The IIA Framework		
IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Population and Equalities	IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	<ul style="list-style-type: none"> • ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: <ul style="list-style-type: none"> ○ education facilities? ○ recreation facilities? ○ health services? • increase the delivery of new or enhanced community and health facilities? • help ensure all children have access to a local school within reasonable walking distance? • increase education facility provision for children with learning disabilities? • ensure local facilities have capacity to accommodate proposed development? • ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity? • avoid an adverse/ discriminatory impact on protected characteristics/equality groups? • ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled, elderly, families with children?
Health	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	<ul style="list-style-type: none"> • use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion? • ensure everyone has access to places to mix and meet such as community facilities (e.g.: community halls and places of worship) and recreation facilities? • increase and improve opportunities for active travel including walking and cycling? • increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities? • ensure everyone has access to open space to help promote healthy lifestyles and wellbeing? • increase provision of private amenity space? • encourage the protection of allotments and encourage the delivery of new spaces to grow food? • ensure all representative groups will be consulted and engaged with?



Table NTS.1: The IIA Framework		
IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Housing	IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	<ul style="list-style-type: none"> • increase the number of additional homes delivered to meet local needs/targets? • increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)? • provide affordable homes of the tenure and size to meet the identified needs? • increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)? • increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children? • provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?
Transport and Accessibility	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	<ul style="list-style-type: none"> • ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport? • encourage intensification in existing residential areas in the most accessible locations within the borough? • improve existing cycling and walking network and provide new routes? • increase and improve opportunities to access public transport including where there are existing issues (such as steps)? • reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?



Table NTS.1: The IIA Framework		
IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Air, Noise & Light	IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	<ul style="list-style-type: none"> • ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development? • avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security? •
Climatic Factors	IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	<ul style="list-style-type: none"> • support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)? • support the shift towards usage of electric and ultralow emissions vehicles? • promote a low carbon local economy? • ensure new developments are energy efficient? • minimise greenhouse gas emissions?
	IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	<ul style="list-style-type: none"> • minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage? • ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity? • encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?



Table NTS.1: The IIA Framework

IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Biodiversity, Geodiversity, Flora & Fauna	IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	<ul style="list-style-type: none"> • avoid adverse effects on European designated habitats sites? • conserve, enhance and repair nationally and locally designated wildlife sites? • conserve, enhance and repair natural and semi natural habitats? • contribute to the delivery of new or safeguard existing BAP priority species and habitats? • achieve biodiversity net gain (BNG) in new developments? • provide new or improved access to greenspaces? • contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)? • protect sites of geological importance?
Cultural Heritage	IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	<ul style="list-style-type: none"> • Conserve and/or enhance heritage assets, cultural and archaeological assets and features, and their settings? • maintain and enhance access to cultural heritage assets? • ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context? • contribute to the better management of heritage assets and contribute to conserving heritage at risk? • improve the quality and condition of the historic environment? • encourage heritage-led regeneration? • help provide solutions to those assets on the Heritage at Risk register?



Table NTS.1: The IIA Framework		
IIA Topic	Proposed IIA Objective	Assessment Question. Does the policy or option...?
Landscape and Townscape	IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	<ul style="list-style-type: none"> • respect, maintain and strengthen local landscape and townscape character and distinctiveness? • promote high quality and contextually successful design? • avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact? • protect sensitive areas and protected views? • safeguard landscape and townscape features such as trees?
Soils, Water & Minerals	IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	<ul style="list-style-type: none"> • seek to improve or remediate contaminated land or reuse previously developed land which has not been restored? • avoid development of greenfield land? • promote the efficient use of minerals? • protect soil quality and avoid soil pollution? • ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments? • protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies? • Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?
Waste	IIA14 Waste: To minimise waste	<ul style="list-style-type: none"> • encourage new developments to provide adequate space for waste separation? • encourage the repurposing and refurbishing of buildings, instead of demolition? • ensure waste is dealt with in line with circular economy principles? • safeguard existing waste management sites?



Table NTS.2: Priority IIA Objectives for Each Constituent Assessment					
IIA Objective	EqIA	HIA	HRA	SEA	SA
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	✓				✓
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	✓	✓			✓
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities and recreational resources (including open spaces and sports facilities)	✓	✓		✓	✓
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	✓	✓		✓	✓
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups	✓	✓		✓	✓
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage	✓	✓		✓	✓
IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	✓	✓		✓	✓
IIA8 Minimising Contributions to Climate Change: To reduce the borough’s contribution towards the emission of climate change gases		✓		✓	✓
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability		✓		✓	✓
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats			✓	✓	✓
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment				✓	✓
IIA12 Landscape and Townscape: To conserve and enhance the borough’s landscape and townscape character				✓	✓
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources		✓		✓	✓
IIA14 Waste: To minimise waste					✓



3.2 Assumptions and limitations

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This has been listed for each topic area in Appendix B of the main IIA Report. Data gaps include assessments and evidence base which is not yet available (e.g. the Harrow Economic Development Needs Assessment and the Local Housing Need Assessment Report). Some data is out dated and some, such as economic data, is updated regularly so the baseline data provided, is based on a snapshot of available data at the time of writing. The data provided through the Harrow Local Plan Authority's Monitoring Report (2017-2019) is outdated. Relevant data will be updated once the next annual report is released. The Harrow Council Infrastructure Delivery Plan is currently being produced. There are likely to be a number of contaminated sites within the Borough, however there is no existing data on this.

The assessment of policies and reasonable alternatives, including spatial policies/alternatives, has been undertaken as a desk-based exercise using the baseline information presented in Appendix B and using published GIS data. No site allocations have been identified within the Regulation 18 version of the Local Plan and therefore no potential site allocation options have been assessed as part of the IIA yet. No site visits have been undertaken specifically for the purposes of the IIA.

Preferred policies and reasonable alternatives were assessed by a number of assessors at the same time. The assessment has been undertaken on the understanding that the preferred policies are to be read in conjunction with the other preferred policies within the draft Local Plan and were not assessed in isolation.

Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the plan will be implemented and limited by understanding of the available data. Given uncertainties there is need to make assumptions. Assumptions are made cautiously and explained within the assessment text. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan and alternatives in more general terms.

Some assumptions and limitations are noted within the assessments of the policies and alternatives, the full details of which can be found within Appendix D of the main IIA Report. For example, the appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain. If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the assessment may alter.



4 What is the borough like now and how may it change in the future?

Detailed data about the Borough is presented within Appendix B of the main IIA Report. This section provides summary of the Borough and the key sustainability issues within Harrow, as well as the likely evolution of such issues over the lifetime of the Plan.



Table NTS.3: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan		
Sustainability Issues	Description	Likely Evolution Without the Plan
Economy and Employment		
Lack of economic activity	There is reduced economic activity across Harrow, including in Harrow town centre and Wealdstone industrial area, and smaller town centres such as Burnt Oak, North Harrow and Rayners Lane.	Without the Local Plan, the economic growth of the Borough is likely to be limited further.
Limited delivery of employment land	Employment land delivery within the Borough has historically been low.	Without the Local Plan, the provision of employment land is likely to be limited due to pressure from housing development. This could result in economic growth of the Borough being limited further.
Population and Equalities		
Population Increase	The population of the Borough will continue to increase significantly.	Without the Local Plan, average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen. A shortfall in primary and secondary school places, as well as specialist schools, is also likely to persist.
Deprivation	Social deprivation is an issue for parts of Harrow, particularly the North, centre, and the South of the Borough.	Without the Local Plan, average house prices are likely to remain high and the provision of affordable housing is likely to remain small. As a result, the baseline situation could continue or worsen.
Dependant population	The Borough has an ageing population, with 19.7% of the Borough's residents predicted to live past 65 by 2031, resulting in an increasingly dependent population with resulting health and social care issues.	Without the Local Plan to encourage and facilitate the delivery of a mix of new, accessible housing and new community facilities, the baseline situation of an ageing population will continue.
Crime	Crime rates within the Borough relatively low, however fear of crime is considered an issue locally.	Without the Local Plan to discourage crime and acquisition across the Borough, the baseline situation is likely to continue.



Table NTS.3: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan		
Sustainability Issues	Description	Likely Evolution Without the Plan
Health		
Life expectancy	Levels of deprivation vary throughout the Borough; life expectancy is 7.8 years lower for men and 5.4 years lower for women in the most deprived areas of Harrow than in the least deprived areas	Without the Local Plan, health prospects may worsen, particularly in the most deprived areas, creating a larger gap in the life expectancy between Borough wards.
Health issues	There are a range of health issues across the Borough. Healthy life expectancy for the Harrow is subsequently lower than neighbouring Boroughs.	Without the Local Plan, health prospects may worsen creating more pressure on the National Health Service and poor health in residents e.g. obesity, tooth decay, and health issues associated with poor air quality.
Access to open space	More than 25% of Harrow is classed as Areas of Deficiency suggesting access to open space in these areas, specifically in the central and Southern section of the Borough where population density is higher, is limited	Policy intervention from the Local Plan could support improving levels of physical activity through walking and cycling, improving access to facilities and services by these modes through improvements to the public realm and improving access to open space, particularly in areas of deprivation.
Housing		
Housing mix and affordability	There is a need for a mix of housing to be provided across the Borough, relating to type, size and tenures. The average house prices across the Borough are high, particularly in relation to low wage levels. There is subsequently a shortage of affordable housing across the Borough to meet the overall needs identified.	Without the Local Plan, the Council is likely to be less effective in encouraging housing in the most sustainable locations, and ensuring the right type, size and tenure of housing is delivered to address local needs. This may adversely impact existing social, economic, environmental, and health inequalities and issues. Average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen.
Sustainable Locations	The London Plan seeks to direct higher levels of housing growth to the most accessible and sustainable locations of the Borough which it has identified as the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre), followed by Edgware	Without the Local Plan, housing delivery could be constrained in the short term, although in the longer-term, requirements in the NPPF to have a five-year supply of housing sites would enable the further delivery of housing sites to meet need, through the planning application process. However, this would be on an ad-hoc basis and may potentially not be located in the most sustainable locations.



Table NTS.3: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan		
Sustainability Issues	Description	Likely Evolution Without the Plan
	Major Centre, and the District and local centres across the Borough.	
Transport and Accessibility		
Poor cycle networks	There are a number of barriers to cycling in the Borough, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft.	Without the Local Plan, poor cycle networks could restrict the expansion of people using cycling as a means to travel, as well as threaten the safety of cyclists. Workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users.
Public transport demand and accessibility	The accessibility of public transport remains an issue within Harrow. Accessibility to public transport is low in some areas of deprivation, particularly to the North of the Borough and accessible, step-free entrances are not available at all tube stations. This is a significant issue as a significant proportion of disabled residents rely on public transport links. Harrow bus station is also operating over capacity.	Without the Local Plan and policy intervention to improve the transport network, workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users. Without investment into the accessibility of public transport, current options may not meet the needs of the future population in the long term, which is expected to increase.
Air, Noise and Light		
Worsening of air quality	Air quality concerns remain an issue within the Borough, and Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues. This is highly likely to be linked to the reliance on private petrol/diesel fuelled vehicles as the primary mode of transport.	Without policy intervention and significant investments, the target to achieve carbon neutrality and therefore improve air quality in the Borough will not be achieved. Development within the AQMA could also exacerbate current air pollution by increasing the number of people travelling by private vehicles.
Noise and Light Pollution	Development could also contribute to the creation of noise and light pollution within the Borough, through construction works or inappropriately located development.	Noise and light pollution levels are likely to worsen without the Local Plan; this is due to uncontrolled development, particularly in rural areas. This is likely to have adverse impacts on wellbeing.



Table NTS.3: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan		
Sustainability Issues	Description	Likely Evolution Without the Plan
Climatic Factors		
Contributions to climate change	Harrow Borough currently has minimal resilience to climate change or renewable energy capacity. Domestic and transport emissions are the main contributors of CO ₂ in the Borough as residents are reliant on petrol/diesel fuelled vehicles.	Without the Local Plan to encourage and facilitate resilience to climate change and the implementation of renewable energy generating developments, the baseline situation is likely to continue, or worsen with development. This will make it unlikely that Harrow Borough achieves its commitment to becoming carbon neutral by 2030.
Flood risk	The Borough is susceptible surface water flood events. Properties in Harrow stand to experience a 97% increase in internal hydraulic sewer flooding and a 35% increase in external hydraulic sewer flooding by 2050.	Flood risk is likely to become worse with climate change and the increased occurrence of extreme weather events, affecting the intensity and frequency of precipitation. Without the Local Plan guiding development to areas of lowest flood risk, the risk of development occurring in areas of higher flood risk could increase. The importance of sustainable adaptation measures to flood risk, such as SUDs, will also be dismissed without the Local Plan.
Biodiversity, Geodiversity, Flora and Fauna		
Pressure on protected species' habitats	There are a range of nature conservation sites and designated water bodies within the Borough which require protection from development. Potential effects on European designated Habitats Sites needs to be considered.	Development pressures could worsen without the Local Plan policies to guide development to the least sensitive parts of the Borough, and provide wildlife corridor zones. This could lead to continued degradation and possible loss of nature conservation sites, designated water bodies, and species. Further population growth could also increase pressure on existing nature areas, due to the lack of access opportunities.
Cultural Heritage		
Threats to the historic environment	There are a number of heritage assets and conservation areas likely to be impacted from development within the Borough. There are 19 assets on the heritage at risk register. There is pressure from development on the settings and significance of heritage assets and on wider historic landscapes and townscapes.	Without the Local Plan policies which protects heritage assets from the potential negative effects of development and encourages enhancements, the baseline situation is likely to continue.



Table NTS.3: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan		
Sustainability Issues	Description	Likely Evolution Without the Plan
Landscape and Townscape		
Threats to landscape	21.5% of the Borough is identified as Green Belt land and 6.2% is protected as Metropolitan Open Land.	Without the Local Plan policies which protect the certain areas of the landscape from the possible impacts of development, the baseline situation is likely to continue. Development pressures on Green Belt and Metropolitan Open Land are likely to contribute to landscape character degradation.
Soils, Water and Minerals		
Water resources	There is high demand for water resources across Harrow, as residents currently use more water per day than the London average. None of the waterbodies within the Borough are currently achieving 'good' overall status, and two waterbodies received an 'poor' overall status.	It is likely that increases to population will drive further water demand within the Borough. This is likely to place strain on both demand, as well as wastewater treatment services. Without the local plan encouraging efficiency measures such as SUDs to reduce flood risk and encourage quality, water resources are likely to be negatively affected.
Waste		
Waste	Less than two fifths of waste is recycled, reused, or composted within the Borough. As a result, the Borough falls within the lowest quartile for recycling in England.	With an increasing population within the Borough, it is likely that the amount of waste produced will continue to rise. Without the local plan, this will result in even less waste being recycled, reused or composted and is likely that the waste hierarchy will not be followed effectively.



5 IIA Assessment Findings

The preferred policies within the draft Local Plan and a number of reasonable alternatives have been assessed, all to the same level of detail to allow comparison of the preferred and rejected options. Please note that the plan authors have not been able to identify reasonable alternatives for all policies. The reasonable alternatives are detailed within Appendix C of the main IIA Report and are listed in Table NTS.4 below.

Table NTS.4: Policies and Alternatives Assessed	
Policies	Alternatives
Spatial Strategy	<ul style="list-style-type: none"> Alternative 1: Retain existing spatial strategy Alternative 2: Seek to go beyond the level of development identified in the proposed strategy
<ul style="list-style-type: none"> Strategic Policy 01: High Quality Growth GR1 Achieving a High Standard of Development GR2 Inclusive Neighbourhoods GR3 Public realm and connecting places GR4 Building Heights GR5 View Management 	No alternatives identified
GR6: Areas of Special Character	<ul style="list-style-type: none"> Reasonable Alternative 1: No Policy Option
<ul style="list-style-type: none"> GR7 External Lighting GR8 Shopfronts & Forecourts GR9 Outdoor advertisements, digital displays and hoardings 	No alternatives identified
GR10: Infill and backland sites, back gardens and amenity areas	<ul style="list-style-type: none"> Alternative 1 - No Policy Option Alternative 2 - More permissive policy
GR11 Planning Obligations	No alternatives identified
<ul style="list-style-type: none"> Strategic Policy 02: Heritage HE1 Heritage Assets HE2 Enabling development 	No alternatives identified
Strategic Policy 03: Meeting Harrow's Housing Needs	<ul style="list-style-type: none"> Alternative 1: High housing growth Alternative 2 Low housing growth: Stepped trajectory over a fifteen-year plan period



Table NTS.4: Policies and Alternatives Assessed	
Policies	Alternatives
HO1: Dwelling Size Mix	<ul style="list-style-type: none"> Alternative 1: Continue with existing policy DM 24 Housing mix 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) Alternative 3: include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing Alternative 4: Do not apply 25% family housing target to minor development
HO2: Conversion and redevelopment of dwellings	<ul style="list-style-type: none"> 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). Option 2: Policy should not include a minimum 130m² size threshold for the conversion/redevelopment of homes into flats. Option 3: Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m² capable of providing a three-bed unit with access to a garden. Option 4: Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6 Option 5: The proposed housing conversions policy should not apply to demolitions of a larger family sized home. 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
HO3: Optimising the use of small housing sites	No alternatives identified
HO4: Genuinely affordable housing	<ul style="list-style-type: none"> Alternative 1: To put a greater emphasis on intermediate products
HO5: Housing estate renewal and regeneration	<ul style="list-style-type: none"> Alternative 1: Alternative approach would be no policy 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).



Table NTS.4: Policies and Alternatives Assessed	
Policies	Alternatives
HO6: Accommodation for Older People	<ul style="list-style-type: none"> Alternative 1: Continue existing Local Plan policy approach (DM 29) Alternative 2: Support proposals within/edge of town centres (excluding neighbourhood centres) 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
HO7 Supported and Sheltered Housing	<ul style="list-style-type: none"> Alternative 1: Continue existing Local Plan policy approach (DM 29)
HO8 Purpose Built Student Accommodation	<ul style="list-style-type: none"> Alternative 1: No Policy Alternative 2: Allow PBSA schemes within accessible locations with PTAL 3-6
HO9 Large Scale Purpose Built Shared Living (LSPBSL)	<ul style="list-style-type: none"> Alternative 1: No Policy Alternative 2: Do not require applicants to demonstrate a need for LSPBSL 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 Alternative 4: Do not include distance test for assessing over concentration of LSPBSL
HO10 Housing with shared facilities (Houses in Multiple Occupation)	<ul style="list-style-type: none"> Alternative 1: Continue to apply existing policy (DM30) 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) Alternative 3: Allow HMOS within accessible locations with a PTAL 3-6 Alternative 4: Do not include a specific measure to assess the over concentration of HMO's
HO11: Self-build and Custom build housing	No alternatives identified.
HO12 Gypsy and Traveller Accommodation Needs	<ul style="list-style-type: none"> Alternative 1: No policy Alternative 2: Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015)



Table NTS.4: Policies and Alternatives Assessed	
Policies	Alternatives
<ul style="list-style-type: none"> Strategic Policy 04: Local Economy Strategic Policy 05: Harrow & Wealdstone Opportunity Area 	No alternatives identified.
LE1 Development Principles & Town Centre Hierarchy	Alternative 1: Less restrictive policy
LE2 Night-time and Evening Economy	No alternatives identified.
LE3 Industrial Land	<ul style="list-style-type: none"> Alternative 1 – allow for the full range of appropriate industrial uses Alternative 2 – allow for co-location
<ul style="list-style-type: none"> LE4 Culture and Creative Industries LE5 Tourism and Visitor Accommodation 	No alternatives identified.
<ul style="list-style-type: none"> Strategic Policy 06: Community Infrastructure CI1 Safeguarding and Securing Social Infrastructure CI2 Play and Informal Leisure CI3 Sport and Recreation CI4 Digital and Communications Infrastructure 	No alternatives identified.
<ul style="list-style-type: none"> Strategic Policy 07: Green Infrastructure GI1 Green Belt and Metropolitan Open Land 	No alternatives identified.
GI2: Open Space	Alternative 1: More restrictive policy
GI3 Biodiversity	Alternative 1: Align with the Environment Act
<ul style="list-style-type: none"> GI4 Urban Greening, Landscaping and Trees GI5 Food Growing 	No alternatives identified.
Strategic Policy 08: Responding to the Climate and Nature Emergency	No alternatives identified.



Table NTS.4: Policies and Alternatives Assessed	
Policies	Alternatives
CN1: Sustainable Design and Retrofitting	<ul style="list-style-type: none"> Alternative 1: Development size threshold Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations
<ul style="list-style-type: none"> CN2 Energy Infrastructure CN3 Reducing Flood Risk CN4 Sustainable Drainage CN5 Waterway Management 	No alternatives identified.
<ul style="list-style-type: none"> Strategic Policy 09: Managing Waste and Supporting the Circular Economy CE1 Reducing and Managing Waste CE2 Design to Support the Circular Economy 	No alternatives identified.
<ul style="list-style-type: none"> Strategic Policy 10: Transport and Movement M1 Sustainable Transport M2 Parking M3 Deliveries, Servicing and Construction 	No alternatives identified.

This section provides an overview of how the preferred plan policies and their alternatives have performed within the assessment. For each group of policies and alternatives, 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 NTS.5. The alternatives are shown in purple italicised text within the summary tables so that they can be differentiated from the preferred policies.

Table NTS.5: Key to Sustainability Significance Scores	
Potential Sustainability Effect	Symbol
Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	--



No potential significant negative effects have been identified in the assessment of the preferred policies (only for some of the alternative policy options which have not been selected).

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

With regards to the High Quality Growth chapter policies, potential significant positive effects being identified in relation to IIA1 (Economy) for Strategic Policy 01: High Quality Growth, IIA7 (Air, Light and Noise Pollution) for Policy GR1 Delivering High Quality Design and Policy GR9 Outdoor Advertisement, Digital Display and Hoardings, and IIA12 (Landscape and Townscape) for Strategic Policy 01: High Quality Growth, Policy GR4 Building Heights and Policy GR5 View Management. However, a number of uncertain effects have been identified. In relation to IIA9 (Climate Change Mitigation) for Strategic Policy 01 High Quality Growth the uncertain effect is identified because the strategic policy does not mention risks from climate change to the economy or the need for the economy of Harrow to be resilient. In relation to IIA13 (Water and Soil) and IIA14 (Waste) for Policy GR1 Delivering High Quality Design, the uncertain effects are identified because the reference to the circular economy could include the reuse of demolition materials, sustainable material etc but it is open to interpretation. Mitigation measures have been identified for these uncertain effects and these are listed in Section 11 of this report.

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

The Housing chapter policies set out the need for housing which will meet the needs of the Borough to predominantly be located within the Harrow and Wealdstone Opportunity Area, followed by locations within/ proximity to town centres, public transport hubs and highly accessible locations with a PTAL score 3-6. As a result, the Housing chapter policies have performed well, particularly against IIA objectives relating to Housing (IIA5), Accessibility (IIA3), Health and Wellbeing (IIA4) and Sustainable Travel (IIA6). Two uncertain effects have been identified, however, in relation to IIA5 (Housing) for policies HO8 (Student Accommodation) as it is unclear if there is a need for such accommodation within the Borough.

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



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

With regards to the Green Infrastructure chapter policies, potential significant positive effects have been identified in relation to IIA10 (Biodiversity and Geodiversity) for GI3 Biodiversity and GI4 Urban Greening, Landscaping and Trees. An uncertain effect has also been identified in relation to IIA10 (Biodiversity and Geodiversity) for GI2 Open Space. This is because the requirements of the policy enhance biodiversity and natural capital, as well as access to biodiversity, whilst ensuring that there is no loss of access to natural greenspace from development. However, as the policy allows for the development of community infrastructure in exceptional circumstances, this could also cause harm to existing biodiversity. A mitigation measure is identified in Section 10 to address the uncertain effect identified.

The policies within the Climate and Nature chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA6 (Sustainable Travel), IIA8 (Climate Change Adaptation), IIA9 (Climate Change Mitigation) and (IIA13 Soil and Water). An uncertain effect has been identified in relation to IIA5 (Housing) for Strategic Policy 08: Responding to the Climate and Nature Emergency as the policy places high demand on housing design which could lead to greater costs for developers which could affect delivery. A viability assessment will be undertaken to ensure the requirement of this, and other policies, does not impact the viability of potential sites and delivery of the Plan.

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

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



Table NTS.6: 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



Table NTS.7: Summary of High Quality Growth 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 01: High Quality Growth	++	0	0	+	0	+	0	0	?	0	+	++	0	0
GR1 Delivering High Quality Design	0	0	+	+	0	0	++	+	+	+	+	+	?	?
GR2 Inclusive Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0
GR3 Public Realm and Connecting Places	0	0	+	+	0	+	+	+	+	0	+	+	0	0
GR4 Building Heights	+	0	0	+	+	0	+	0	0	0	+	++	0	0
GR5 View Management	0	0	+	0	0	0	0	0	0	0	+	++	0	0
GR6 Areas of Special Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
<i>GR6 Areas of Special Character: Alternative 1</i>	0	0	0	?	0	0	0	0	0	-	-	-	0	0
GR7 External Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0



Table NTS.7: Summary of High Quality Growth 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
GR8 Shopfronts and Forecourts	+	0	+	+	0	0	0	0	0	0	+	+	0	0
GR9 Outdoor Advertisement, Digital Display and Hoardings	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10 Infill and Backland Sites, Back Gardens and Amenity Areas	0	0	+	+	+	+	0	0	0	+	0	+	0	+
<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
<i>GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 2</i>	0	0	?	+	?	?	0	0	0	+	0	--	0	+
GR11 Planning Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0



Table NTS.8: Summary of Heritage Policies 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 02: Harrow Heritage Assets	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1 Heritage Assets	+	0	0	0	0	0	0	+	+	+	++	++	0	0
HE2 Enabling Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0



Table NTS.9: Summary of Strategic Policy 03 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



Table NTS.10: Summary of Policy HO1 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



Table NTS.11: Summary of Policy HO2 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 Redevelopment of Larger Dwellings: Alternative 4</i>	0	0	-	-	++	-	-	?	0	0	+	+	+	+



Table NTS.11: Summary of Policy HO2 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>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	+	+	+	+



Table NTS.12: Summary of Policy HO4 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



Table NTS.13: Summary of Policy HO5 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



Table NTS.14: Summary of HO6 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 HO6 Accommodation for Older People	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



Table NTS.15: Summary of HO7 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 Supported Sheltered Housing	HO7 and	0	0	++	+	+	+	0	0	0	0	0	0	+	0
<i>Policy Supported Sheltered Housing: Alternative 1</i>	<i>HO7: and</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0



Table NTS.16: Summary of Policy HO8 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



Table NTS.17: Summary of Policy HO9 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 Built Shared Living: Alternative 4</i>	+	+	?	+	?	+	0	0	0	0	0	-	0	+



Table NTS.18: Summary of Policy HO10 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	+
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1	0	0	+	0	-	+	0	+	0	0	0	?	0	-
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2	0	0	+	+	--	+	0	0	+	+	0	-	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3	0	0	+	+	-	+	0	0	+	+	0	-	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 4	0	0	-	+	-	+	0	0	+	+	0	-	0	+



Table NTS.19: Summary of Policy HO11 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
HO11 Self-build and Custom-build Housing	0	0	+	0	+	0	0	0	0	0	0	0	0	0

Table NTS.20: Summary of Policy HO12 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</i>	0	0	?	--	-	?	0	0	+	?	0	-	0	0



Table NTS.20: Summary of Policy HO12 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>Needs: Alternative 1⁴</i>														
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 2</i>	0	0	--	--	--	+	0	0	+	+	0	+	+	+

⁴ 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.



Table NTS.21: Summary of Local Economy 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 04: Local Economy	++	++	0	0	?	0	0	0	0	0	0	0	0	0
Strategic Policy 05: Harrow & Wealdstone Opportunity Area	++	+	+	+	+	++	0	+	+	+	+	+	0	0
LE1 Development Principles and Town Centre Hierarchy	++	+	+	+	0	+	+	0	0	0	0	+	0	+
<i>LE1 Development Principles and Town Centre Hierarchy: Alternative 1</i>	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE2 Night-time and Evening Economy	++	+	0	0	0	0	+	0	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	+



Table NTS.21: Summary of Local Economy 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>LE3 Industrial Land: Alternative 2</i>	?	+	0	0	+	+	0	+	0	0	0	0	0	+
LE 4 Culture and Creative Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5 Tourism and Visitor Accommodation	++	+	+	+	+	+	+	0	0	0	+	+	0	+



Table NTS.22: Summary of Community Infrastructure Policies 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 06: Social and Community Infrastructure	+	+	+	+	0	0	0	0	+	+	0	0	0	0
CI1 Safeguarding and Securing Social Infrastructure	+	+	+	++	0	+	+	0	0	0	0	0	0	+
CI2 Play and Informal Recreation	0	0	+	++	0	0	0	0	+	+	0	0	0	0
CI3 Sport and Recreation	+	+	+	++	0	+	+	0	0	+	+	+	+	0
CI4 Digital and Communications Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0



Table NTS.23: Summary of Green Infrastructure 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 07: Green Infrastructure	0	0	0	+	0	0	+	0	+	+	0	+	+	0
GI1 Green Belt and Metropolitan Open Land	0	0	0	+	0	0	0	0	0	+	+	+	+	0
GI2 Open Space	0	0	+	+	0	0	0	0	+	?	0	0	0	0
<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
GI4 Urban Greening, Landscaping and Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
GI5 Food Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0



Table NTS.24: Summary of Climate and Nature Policies Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change 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 08: Responding to the Climate and Nature Emergency	0	+	0	+	?	++	+	++	+	+	0	0	+	+
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
CN2 Energy Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0
<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
CN3 Reducing Flood Risk	+	0	0	+	0	0	0	0	++	+	0	0	+	0
CN4 Sustainable Drainage	+	0	0	+	0	0	0	0	++	+	0	0	++	0



Table NTS.24: Summary of Climate and Nature Policies Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change 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
CN5 Waterway Management	0	+	0	0	0	0	0	0	+	+	0	0	+	0

Table NTS.25: Summary of Waste and Circular Economy Policies Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change 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 09: Managing Waste and Supporting the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1 Reducing and Managing Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++



Table NTS.25: Summary of Waste and Circular Economy Policies Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change 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
CE2 Design to Support the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	0	0	++

Table NTS.26: Summary of Movement Policies 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 10: Movement	+	0	+	+	0	++	+	+	0	0	0	0	0	0
M1 Sustainable Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2 Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0



Table NTS.26: Summary of Movement Policies 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
M3 Deliveries, Servicing and Construction	0	0	0	+	0	+	+	+	0	0	0	0	0	0



6 Equalities Impact Assessment

This section summarises the Equalities Impact Assessment (EqIA) part of the IIA. The Equality Act 2010 requires public bodies to:

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

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

Within the IIA the following objectives are relevant to the EqIA: IIA1, IIA2, IIA3, IIA4, IIA5, IIA6 and IIA7. Table NTS.27 summarises the potential significant positive effects the Local Plan policies may create, relating to EqIA. No potential significant negative or uncertain effects were identified in relation to EqIA.



Table NTS.27: EqIA related potential significant positive effects		
Identified Effect	Description	Relevant Policies
Employment Opportunities	<p>Providing equitable access to jobs that provide decent living incomes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups. The diversification and growth of Harrow's business could result in the provision of more skilled jobs that include training and qualification opportunities for its employees.</p> <p>This would create a resilient local economy and a variety of employment opportunities. This would benefit younger and working-age people as well as those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups.</p>	<ul style="list-style-type: none"> Strategic Policy 05: Harrow & Wealdstone Opportunity Area
Improving access to community infrastructure	<p>Improving access to social and community infrastructure would increase access to education/school facilities, as well as other public spaces available for community use, and ensure everyone has equal access to public and/or private recreational space.</p> <p>Improving access to healthcare will positively affect individuals who are relatively prone to health problems and/or require frequent health care, such as those with disabilities, the elderly, and pregnant people.</p>	<ul style="list-style-type: none"> CI1: Safeguarding and Securing Social Infrastructure CI2 Play and Informal Recreation CI3 Sport and Recreation
Development in suitable locations	<p>Housing should be located in close proximity to shops, services, facilities and public transport to allow future residents, especially those with disabilities, to live comfortably within the Borough.</p>	<ul style="list-style-type: none"> Policy HO7 Supported and Sheltered Housing
Provision of accessible housing	<p>The provision of well designed, accessible housing, as well as the provision for the conversion of existing dwellings to adaptable housing, should help to ensure that future residents with disabilities and other needs are able to locate suitable housing within the Borough.</p>	<ul style="list-style-type: none"> HO1 Dwelling Size Mix HO2 Conversion and redevelopment of larger dwellings Policy HO6 Accommodation for Older People



Table NTS.27: EqIA related potential significant positive effects

Identified Effect	Description	Relevant Policies
		<ul style="list-style-type: none"> • Policy HO7 Supported and Sheltered Housing • Policy HO10 Housing with Shared Facilities (HMO)
Provision of affordable housing	The provision of affordable and low cost rent homes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups. This provision should allow residents, especially families, to live in suitable, but affordable accommodation including those with disabilities who may have specialist housing needs; and young people who may disproportionately struggle to afford housing.	<ul style="list-style-type: none"> • HO2 Conversion and redevelopment of larger dwellings • Policy HO4 Genuinely Affordable Housing • Policy HO5 Housing Estate Renewal and Regeneration
Climate change mitigation	Ensuring the development of appropriate energy infrastructure is considered to bring a number of positive benefits for all protected characteristic groups, mainly by decreasing the effects of climate change that would otherwise negatively affect Harrow’s population.	<ul style="list-style-type: none"> • CN2 Energy Infrastructure
Improving public transport access	Improving access to public transport would enable certain groups, such as people with disabilities, people going through pregnancy and maternity as well as younger and older people, to utilise services and amenities within an accessible distance. Enhancing connectivity between the various neighbourhood and town centres would benefit all protected characteristic groups. This will enable people to access more services, amenities and employment opportunities.	<ul style="list-style-type: none"> • Policy HO5 Housing Estate Renewal and Regeneration • Strategic Policy 05: Harrow & Wealdstone Opportunity Area • Strategic Policy 10 Movement • M1 Sustainable Transport • M2 Parking



7 Health Impact Assessment

This section summarises the Health Impact Assessment (HIA) part of the IIA.

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

Within the IIA the following objectives are relevant to the HIA: IIA2, IIA3, IIA4, IIA5, IIA6, IIA7, IIA8, IIA9, and IIA13. Table NTS.28 summarises the potential significant positive effects the Local Plan policies may create, relating to HIA. Table NTS.29 summarises uncertain effects the Local Plan policies may generate relating to HIA and includes some recommended mitigation. No potential significant negative effects were identified in relation to HIA.



Table NTS.28: HIA related potential significant positive effects		
Identified Effect	Description	Relevant Policies
Improving access to community infrastructure	<p>Improving access to community infrastructure, such as formal and informal sport and recreational facilities, encourages physical activity and delivers a range of social, health and wellbeing benefits to communities, which promotes a healthy and high quality lifestyles.</p> <p>The Local Plan would also see the delivery of more direct health interventions such as improved health and social infrastructure provision to meet needs.</p>	<ul style="list-style-type: none"> • Policy HO5 Housing Estate Renewal and Regeneration • CI1 Safeguarding and Securing Social Infrastructure • CI2 Play and Informal Recreation • CI3 Sport and Recreation
Climate change mitigation	<p>Implementing measures to mitigate against the effects of climate change should improve air quality. This would benefit the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.</p> <p>Increasing the resilience of the Borough to climate change, such buildings and infrastructure designed to withstand extreme weather, reduced flood risk and public spaces designed for hotter weather would also help to reduce risks of major health issues caused by episodes of extreme weather.</p> <p>Reducing carbon emissions could reduce the health effects associated with climate change-induced extreme weather events, such as heat-related illnesses as will more energy efficient design which should reduce the risk of overheating in buildings.</p>	<ul style="list-style-type: none"> • CN2 Energy Infrastructure • CN1 Sustainable Design and Retrofitting
Improving access to public transport	<p>Improving access to public transport would reduce reliance on private vehicle usage, and therefore improve air quality. This should benefit the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.</p>	<ul style="list-style-type: none"> • Strategic Policy 05: Harrow & Wealdstone Opportunity Area • Strategic Policy 10 Movement • M1 Sustainable Transport • M2 Parking



Table NTS.28: HIA related potential significant positive effects		
Identified Effect	Description	Relevant Policies
	The Local Plan supports many of the wider determinants of health, including increased employment and active travel options which will likely have a positive impact on both the mental and physical health of residents.	
Improving access to walking and cycling routes	Improving walking and cycle routes would reduce reliance on private vehicle usage, and therefore improve air quality. This would benefit the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality. This would also encourage residents to be more active, which should lead to lower obesity rates.	<ul style="list-style-type: none"> • Strategic Policy 10 Movement • M1 Sustainable Transport • M2 Parking
Provision of open space	The protection and enhancement of open spaces would provide areas within the urban environment further from sources of noise or poor air quality, such as industry or roads. Provision of open space supports delivery of physical and mental health benefits.	<ul style="list-style-type: none"> • GI2: Open Space
Provision of affordable housing	The provision of affordable and low cost rent homes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities. This provision should allow residents to live in suitable, but affordable accommodation including those with disabilities who may have specialist housing needs.	<ul style="list-style-type: none"> • HO2 Conversion and redevelopment of larger dwellings • Policy HO4 Genuinely Affordable Housing • Policy HO5 Housing Estate Renewal and Regeneration

Table NTS.29: HIA related uncertain effects			
Identified Effect	Description	Mitigation Recommendations	Relevant Policies
Pollution	It is unclear how this quantum of development (16,040 dwellings) delivered over the plan period could contribute to air, noise and light pollution. It is noted that this will be dependent on the location	The IAA assessment of the options for site allocations will identify potential for each site to contribute to air pollution with regards to their location. Potential effect will be	<ul style="list-style-type: none"> • Strategic Policy 03: Meeting Harrow's Housing Needs



Table NTS.29: HIA related uncertain effects			
Identified Effect	Description	Mitigation Recommendations	Relevant Policies
	and design of developments. An increase to air pollution may disproportionately affect the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.	revisited once site allocation options have been assessed.	



8 Habitats Regulations Assessment

This section summarises the HRA part of the IIA.

The scope of the HRA was included within the IIA Scoping Report. No European designated Habitat Sites are present within Harrow Borough but the HRA will consider whether there is potential for activities within the Borough of Harrow to affect Habitats Sites outside of the Borough.

Wimbledon Common and Richmond Park are the closest SACs to Harrow, located 20km South of the Borough boundary. South West London Waterbodies is the closest SPA to Harrow, located 23 km South-West of the Borough boundary.

Appendix E (HRA Screening) of the main IIA Report sets out information about these sites including their location, reasons for designation, current condition, vulnerabilities and factors affecting integrity.

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

The screening has identified potential pathways in relation to recreation pressure, air quality, water quality and water resources in relation to a number of the Habitats Sites. None of the Habitats Sites included within the scope of the HRA has been screened out as yet.

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

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

Screening of the Local Plan is ongoing. Further investigation is needed with regards to the potential for impact pathways to undermine the Conservation Objectives of the Habitats Sites and to ascertain whether significant effects can be excluded.



The HRA statement in Appendix E will be updated following the further investigation and the consultation on the Regulation 18 draft Local Plan.

9 Potential Cumulative Effects

The IIA is required to consider whether the effects of the Local Plan could be cumulative.

This section describes potential cumulative effects identified. They include potential effects which could occur through the effects of the policies interacting or combining. Please see Table NTS.32 for these potential cumulative effects. Please note, in Table NTS.32, where a chapter of the draft Local Plan is referred to, all of the policies within that chapter are considered to contribute to the potential cumulative effect, including strategic policies.

Potential cumulative effects could also occur through interaction of the draft Local Plan with other plans and projects in the Borough and in neighbouring areas. The plans considered for potential cumulative effects are:

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

The projects considered for cumulative effects are:

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

A review of the plans identified potential negative cumulative effects arising as a result of the draft Local Plan in combination with the Three Rivers District Core Strategy 2011-2026, the London Borough of Hillingdon Local Plan 2011-2026, the London Borough of Brent Local Plan 2019-2041 and the London Borough of Ealing Development Plan 2011-2026. The growth proposed within the new Harrow Local Plan could combine with growth proposed within these plans and potentially increase traffic and emissions to air, consequently negatively affecting objectives IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution), and IIA8 (Climate Change Mitigation).

However, potential positive cumulative effects were identified as a result of the combination of the draft Harrow Local Plan policies and the projects in relation to IIA6 (Sustainable Travel), IIA7 (Air, Light and Noise Pollution) and IIA8 (Climate Change Mitigation). Both projects could combine with the draft Harrow Local Plan policies to reduce traffic within Harrow.



10 Mitigation Measures

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

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

No potential significant negative effects have been identified in the assessment of the preferred policies. Mitigation measures have been suggested where uncertain effects have been identified within the assessment of the preferred policies (see Table NTS.30).

Specific mitigation measures for development proposals will be dealt with at the planning application stage when further detail on the layout, scale and location of development being proposed will be known. It is also important to emphasise that all proposals will be considered against the policies in the Local Plan.

Table NTS.30: Proposed Mitigation Measures For The Draft Local Plan – Regulation 18

IIA Objective	Policy	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
IIA5	Strategic Policy 04: Local Economy	Uncertain effect: The policy should expand on the benefits mixed use development schemes could bring to housing development.
IIA5	Strategic Policy 08: Responding to the Climate and Nature Emergency	Uncertain effect: A viability assessment should be undertaken to ensure that the policy is deliverable.
IIA7	Strategic Policy 03: Meeting Harrow's Housing Needs	Uncertain effect: Further investigations into the sites available for development would need to be undertaken.
IIA9	Strategic Policy 01	Uncertain effect: Uncertainty surrounding the performance of the policy could be mitigated by referencing the need for climate change resilience to minimise risk to the economy.
IIA10	GI2 Open Space	Uncertain effect: The policy should state that in circumstances where the development of community infrastructure is allowed for on Open Space, there must be no loss/harm to biodiversity, and that the development must meet the Biodiversity Net Gain of 20% as set out in Policy GI3 Biodiversity.
IIA13	GR1 Achieving a High Standard of Development	Uncertain effect: The policy could do more to clarify that the design and layout of the development should incorporate sustainable materials, water efficiency, soil conservation, protection of the water environment and SUDs etc. Cross reference to policy CN1 Sustainable Design & Retrofitting could be added to the policy.
IIA14	GR1 Achieving a High Standard of Development	Uncertain effect: The policy could do more to clarify that the design and layout of the development should incorporate sustainable materials, incorporate space for waste separation, reuse of buildings, and



Table NTS.30: Proposed Mitigation Measures For The Draft Local Plan – Regulation 18		
IIA Objective	Policy	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
		encourage proposal to follow the waste hierarchy. Cross reference to policy CN1 Sustainable Design & Retrofitting could be added to the policy.

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

11 Proposed Monitoring Arrangements

The final stage of the IIA is monitoring the significant effects of the plan after it's adopted. A schedule of proposed indicators to monitor the effects of the plan will be proposed with the next iteration of the IIA Report at the Proposed Submission / Regulation 19 Local Plan stage. The indicators are required to focus on effects which are predicted to be significantly negative or uncertain. The proposed IIA indicators may overlap with those proposed for monitoring the implementation of the Local Plan. Opportunities to streamline and align the monitoring between the IIA and the Local Plan will be taken as far as possible.

12 Next Steps

The IIA Report is being published for consultation for a 8-week period. Following consultation on both the IIA Report and the draft Local Plan, comments received on both will be considered. Any necessary changes will be made to the IIA Report and to the Local Plan in response to consultee comments and these will be reflected within the next iteration of the Local Plan which will be the Proposed Submission / Regulation 19 Local Plan.

The Proposed Submission /Regulation 19 Local Plan is expected to be published in September 2024 and this will be accompanied by an updated version of the IIA Report.

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

Table NTS.31: Harrow Borough Local Plan Timetable	
Local Plan Activity	Timeframe
Consultation on Draft Local Plan - Regulation 18	March–April 2024
Consultation comments considered	April-August 2024
Consultation on the Proposed Submission Local Plan – Regulation 19	September-October 2024 (6 weeks)
Submission	January 2025



Table NTS.31: Harrow Borough Local Plan Timetable

Local Plan Activity	Timeframe
Examination	January-November 2025
Adoption	December 2025

