



# London Borough of Harrow Council Local Plan Integrated Impact Assessment

## Scoping Report

### London Borough of Harrow Council

Harrow Council Hub, Forward Drive, Harrow, London, HA3 8FL

Prepared by:

#### SLR Consulting Limited

Registered Address: 7 Wornal Park, Menmarsh Road, Worminghall, Aylesbury,  
Buckinghamshire, England, HP18 9PH

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## Acronyms and Abbreviations

Glossary	
Development Plan	The statutory framework for planning decisions, comprising the Development Plan Documents prepared by local planning authorities (this includes County Council, District Councils) and in London boroughs such as Harrow 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.



## 1.0 Introduction

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) depending on any Government proposals that impact upon their ongoing use. This 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).

The Harrow Local Plan will be subject to Integrated Impact Assessment (IIA) (see section 1.2) which will be undertaken by SLR Consulting Ltd working closely with the Council's planning policy team.

This Scoping Report is the first output of the IIA. The purpose of the scoping stage is to set out proposals for conducting the IIA, so that the IIA tests the sustainability of the Local Plan using up to date information.

This Scoping Report provides baseline information on the environmental (including Habitat Sites), social (including health and equality), and economic characteristics of the plan area, including the likely evolution of the baseline position which would occur without the plan. The Scoping Report also sets out a methodology and framework for the assessment of the Local Plan and its alternatives. It also identifies the significant effects that the assessment will need to focus on. It has been prepared for consultation with the statutory consultees<sup>1</sup> and key stakeholders in order to agree the scope of the IIA.

### 1.1 What is Sustainability?

International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly<sup>2</sup> defined sustainable development as '*meeting the needs of the present without compromising the ability of future generations to meet their own needs*'.

The UK Sustainable Development Strategy Securing the Future<sup>3</sup> set out five 'guiding principles' of sustainable development:

- Living within the planet's environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

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

<sup>2</sup> United Nations, General Assembly, Report of the World Commission on Environment and Development, 1987

<sup>3</sup> The UK Government Sustainable Development Strategy, Securing the Future, 2005





The National Planning Policy Framework<sup>4</sup> ( ) sets out the Government's planning policies for England and how these are expected to be applied. The whole of the NPPF constitutes the Government's view of what sustainable development in England means in practice for the planning system.

The NPPF states the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across the different objectives):

- An Economic Objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A Social Objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- An Environmental Objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy.

The NPPF also makes clear (Paragraph 153) that policies in Local Plans should address climate change mitigation and adaptation to ensure the future resilience of communities and infrastructure to climate change impacts.

## 1.2 Integrated Impact Assessment

The requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) will be incorporated into one integrated assessment – an IIA. The IIA will test the Local Plan objectives, policies, potential sites and their reasonable alternatives against a suite of environmental, socio-economic, equalities and health objectives to identify whether there is the potential for significant effects (either positive or negative), and thus provide mitigation in order to promote sustainable development. The IIA will identify potential impacts on the protected groups and identify opportunities within the power of the Local Plan for more positive outcomes for protected groups. It will also identify the key health issues of the local population and the links between planning and health. The IIA baseline will contain relevant and sufficient information about health and equalities on which to undertake the IIA. This assessment will help inform the choice of vision, objectives, policies for scale, locations of new development and development management policies, with the objective of producing a more sustainable plan which addresses issues related to health and equalities.

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<sup>4</sup> Department for Communities and Local Government, The National Planning Policy Framework (NPPF), 2021



### 1.3 Sustainability Appraisal and Strategic Environmental Assessment

A Sustainability Appraisal (SA) of Development Plan Documents (DPDs) is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including DPDs. The purpose of the SEA Directive is to ensure a high level of environmental protection, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development. Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process as set out in the Planning Practice Guidance<sup>5</sup> (updated 2019).

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

### 1.4 Equalities Impact Assessment

An Equalities Impact Assessment (EqIA) is 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. This Act places a general duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. The equality duty came into force in April 2011 and covers the following Personal Protected Characteristics:

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

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<sup>5</sup> Planning Practice Guidance <https://www.gov.uk/government/collections/planning-practice-guidance> (Accessed 17/07/23)



- Sexual orientation.

The integrated EqIA will assess the Local Plan options for potential impacts on the protected groups and identify opportunities within the power of the Local Plan for more positive outcomes for protected groups. Such issues could relate to access to transport (inequalities in access to electric vehicles), access to education and high-wage employment.

## 1.5 Health Impact Assessment

A HIA is a means of assessing the potential health impacts of policies, plans and projects. The HIA process is designed to help decision-makers ensure that health and wellbeing is being properly considered in planning policies and proposals. HIA is not a statutory requirement of the plan preparation process, however, Planning Practice Guidance<sup>6</sup> states that 'Local planning authorities should ensure that health & 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'. Non statutory guidance - such as The NHS London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool – has been referred to and will be considered when health impacts are being assessed.

The NPPF states that 'Planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. (Para 92)'. In addition, the London Plan (2021) Policy GG3 Creating a Healthy City states 'To improve Londoners' health and reduce health inequalities, those involved in planning and development must, D. assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of a Health Impact Assessments'. Further the London Plan (2021) states 'HIA is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.'

The integrated HIA will identify the key health issues of the local population and the links between planning and health, identifying if options will affect health through e.g. physical activity, access to affordable housing, access to healthy food, crime reduction, social cohesion and capital, and environment. The baseline will contain sufficient information about these subjects which are of relevance to planning. Opportunities will be sought in the IIA to improve outcomes, such as increasing cycle use for journeys through linking strategic locations together across boroughs. The HIA will follow a qualitative approach and will seek to ensure that expert knowledge

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<sup>6</sup> [\[Withdrawn\] New national planning policy and guidance aims to promote health and reduce inequalities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/new-national-planning-policy-and-guidance-aims-to-promote-health-and-reduce-inequalities)



informs the process by involving a Public Health officer from the Council's Public Health team if practical.

## **1.6 Habitats Regulation Assessment**

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

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

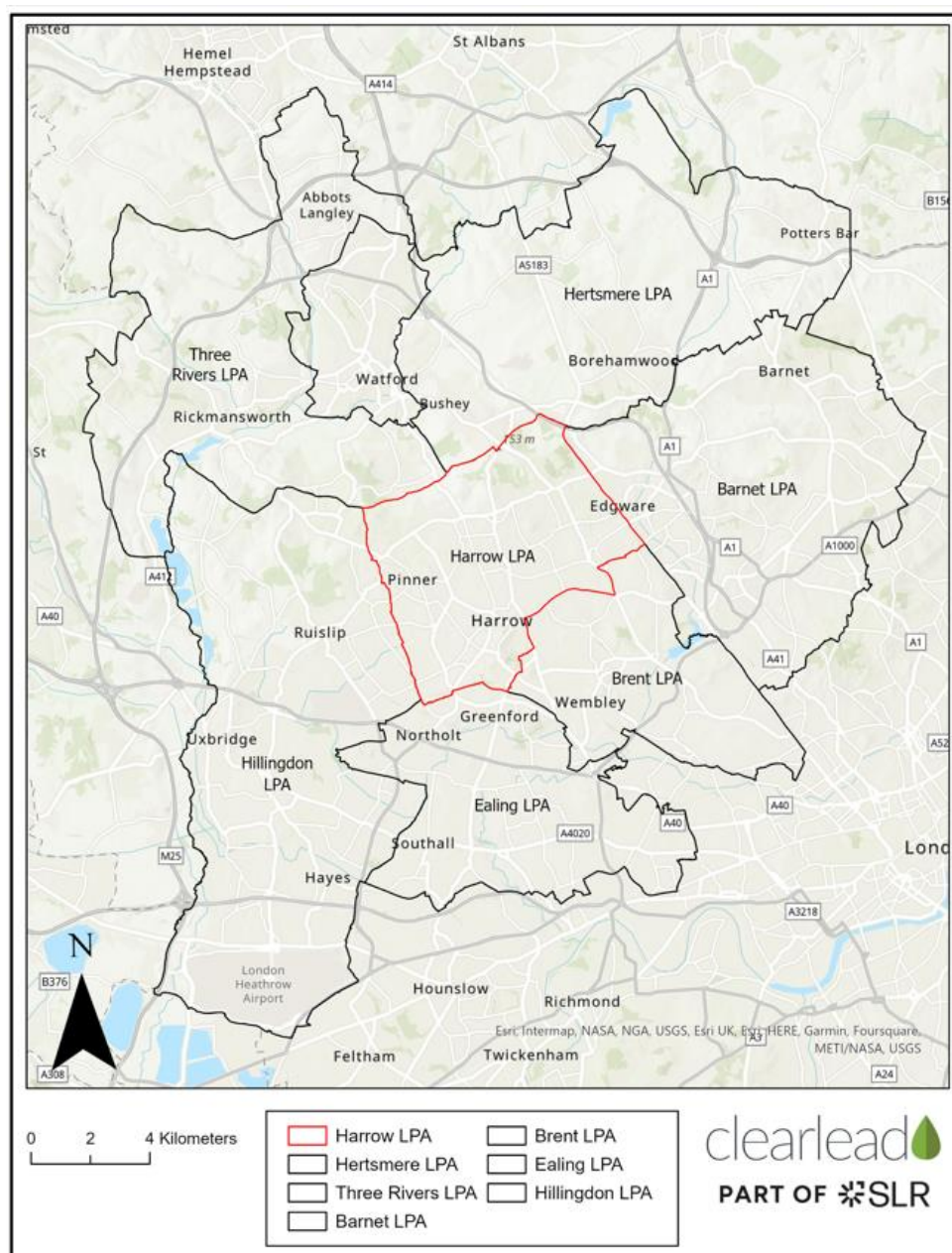
For the London Borough Harrow Council Local Plan an HRA screening exercise will be undertaken to determine if the preferred options (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Habitat Site, in terms of its conservation objectives and qualifying interests. An HRA screening statement will be prepared and the process will be documented in the IIA Report. Natural England will be consulted on the findings of the screening exercise.



## 2.0 The Harrow Local Plan

### 2.1 Harrow Borough

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 12<sup>th</sup> 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 Hertsmeire Borough Council and Three Rivers District Council. Figure 2.1 below showcases Harrow’s location.



**Figure 2.1: Harrow, and its surrounding Local Planning Authorities**

Harrow town centre is one of twelve metropolitan centres in London; it has not experienced the same level of urban growth as neighbouring metropolitan centres,



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 heighten, showcasing an ageing population.

## 2.2 Scope and Content of the Harrow Local Plan

The Borough wide Local Plan will replace the previous Development Plan Documents, which comprise of the Harrow Core Strategy (adopted 2012), Development Management Policies Plan (adopted 2013), Site Allocations Plan (adopted 2013) and the Harrow and Wealdstone Area Action Plan (adopted in 2013). The Harrow Local Plan will be prepared and drafted with the previous Core Strategy<sup>7</sup> and other Development Plan documents in mind, as well as the previous Sustainability Appraisal<sup>8</sup>, Habitats Regulation Assessment<sup>9</sup>, and Inspector's Report<sup>10</sup>.

The Harrow Local Plan will cover the period of 2021-2041. It will set out an overall vision, key objectives and a spatial strategy for the Borough and will include strategic policies accompanied by a range of detailed policies and proposals to support this. Harrow Borough Council have produced draft spatial objectives:

- Our Local Identity- Restoring Pride in Harrow
  - Retain, reinvigorate and reinforce the local distinctive character of Harrow's communities by ensuring new development responds positively to the special attributes of its local context.
  - Respecting the cultural, historic, built and natural environments
  - Ensuring new development is designed, constructed and maintained to a high standard.
  - Conserve and enhance the historic and cultural environment, promoting understanding and appreciation of it. Working with stakeholders to sustain the value of local heritage assets including the international value of Harrow School.
- Infrastructure- a place where those in need are supported
  - Harrow's infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of

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<sup>7</sup> Harrow Core Strategy 2012 [local-plan-core-strategy.pdf \(harrow.gov.uk\)](#) (Accessed 14/07/23)

<sup>8</sup> Harrow Sustainability Appraisal 2012 [Sustainability Appraisal of Submission Development Management, Site Allocations and Area Action Plan DPDs \(harrow.gov.uk\)](#) (Accessed 14/07/23)

<sup>9</sup> Harrow Habitats Regulation Assessment 2012 [Harrow Council](#) (Accessed 14/07/23)

<sup>10</sup> Harrow Local Plan Inspectors Report 2012 [local-plan-site-allocation-inspectors-report.pdf \(harrow.gov.uk\)](#) (Accessed 14/07/23)



social and physical infrastructure, including education, health care, recreation and cultural facilities.

- Transport- a borough that is clean and safe
  - Sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to private vehicles. The council will facilitate modal shift away from fossil fuel car use.
- Air quality- a borough that is clean and safe
  - Air quality improvements will continue to be made through high quality design, spatial planning and sustainable infrastructure improvements.
- Open space- a place where those in need are supported
  - The quality of existing open space will be improved, and new open space provision will be facilitated. Public access to open space will be increased.
- Biodiversity- a borough that is clean and safe
  - The borough's biodiversity will be protected and enhanced, with greenbelt and MOL land becoming a thriving example of biodiversity uplift.
- Climate Emergency- a borough that is clean and safe
  - Harrow will reduce its contribution to climate change through facilitating net zero development where possible, minimising our reliance on fossil fuels, promoting retrofitting and energy efficiency, and utilising sustainable design methods. Harrow will improve its resilience to climate change through adaptation.
- Waste and Recycling- a borough that is clean and safe
  - Harrow will continue to minimise waste and increase recycling rates in line with circular economy principles.
- Housing- a council that puts residents first
  - Harrow will facilitate the delivery of new housing from a range of sources to meet the diverse range of housing needs of a growing population and demographic changes. This will be located within the most sustainable locations of the Borough such as the opportunity area, town centres and sustainable locations to protect, enhance and positively evolve the character of the suburbs.
- Affordable Housing- a council that puts residents first
  - Maximise delivery of genuinely affordable housing to meet the needs of residents.
- Mixed and Inclusive Communities- a council that puts residents first



- Promote inclusive, mixed sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy communities enabling the older population to remain independent and active for longer, as well as providing specialised housing options to meet the needs of vulnerable residents.
- Housing Types- a council that puts residents first
  - Promote a range of well-designed housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families.
- Local Economy- a council that puts residents first
  - Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries.
  - Employment opportunities will be retained and promoted in appropriate employment locations.
- Town Centres- a council that puts residents first
  - Town centres will continue to be attractive, vibrant hubs for investment containing appropriate town centre uses, including thriving evening and night-time economies.

One of the key requirements for producing a new 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 uses) 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, 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)<sup>11</sup>. LBHC are currently in the process of assessing future housing needs beyond the period 2019-2029, as well as the potential capacity to meet these during the period of the Local Plan (2021-2041).

Housing site 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

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<sup>11</sup> The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 14/07/23)





existing residential areas that have good access to local services, facilities and public transport. Employment site 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 not expected to be any need to release any Greenfield sites or sites within the Green Belt or Metropolitan Open Land to meet any residual development needs.

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



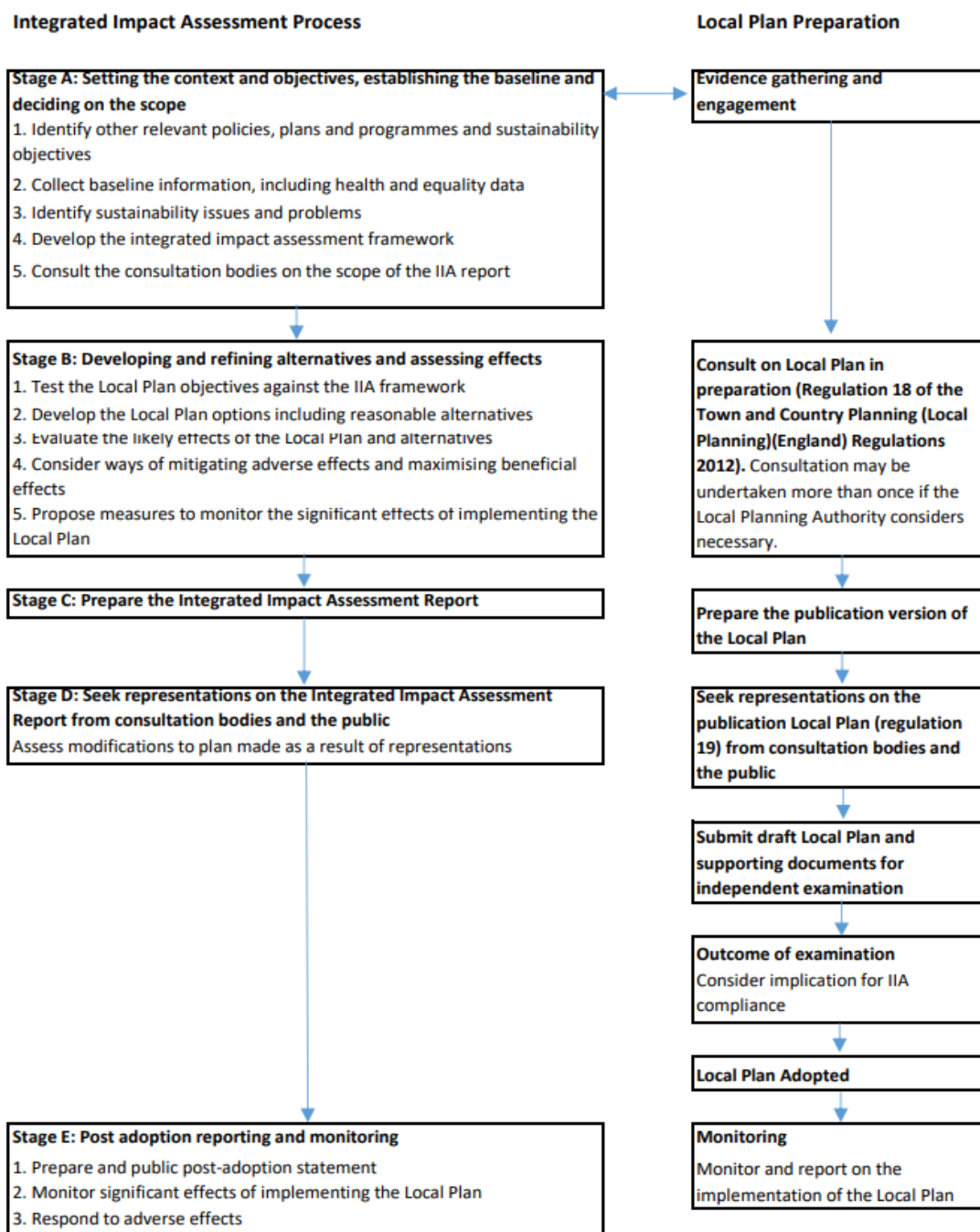
## **3.0 Approach to the IIA**

### **3.1 IIA Process and Requirements for Scoping**

The IIA process is presented in Figure 3.1 and is based on guidance set out in Planning Practice guidance for SEA and SA<sup>12</sup>. The EqIA follows Equality Act 2010 and the Equality Act 2010 (Specific Duties) Regulations 2011; these regulations will be met within this report. The HIA is undertaken to comply with national and regional policy (e.g. The London Plan 2021).

As shown in Figure 3.1, the IIA and plan making processes will occur in tandem, with clear points of feedback between the two processes. Plan making is iterative, thus the IIA will also be an iterative process.





**Figure 3.1: Integrated Impact Assessment Process<sup>12</sup>**

This Scoping Report is a part of Stage A of the IIA process (scoping) and fulfils the requirements to:

- identify environmental, social and economic issues and objectives contained in other strategies, plans and programmes that are relevant to the Local Plan area;

<sup>12</sup> \*Adapted from Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal [sea1\\_013.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671111/sea1_013.pdf)



- provide baseline information on the environmental, social, economic health and equality characteristics of the area; and
- outline an appropriate framework for carrying out the IIA, including objectives and indicators, against which the effect of the plan options and policies will be appraised, mitigated and monitored.

Stage A of the IIA process is carried out in conjunction with evidence gathering and engagement with the Local Plan Preparation.

The requirements of the SEA Regulations with regards to scoping are as follows:

- “when deciding on the scope and level of detail of the information that must be included in the [environmental] report, the responsible authority shall consult the consultation bodies.<sup>13</sup>” (Part 3, Paragraph 5); and
- “where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority’s invitation to engage in the consultation.” (Part 3, Paragraph 6).

These requirements will be met through the consultation on this report.

The EqIA follows Equality Act 2010 and the Equality Act 2010 (Specific Duties) Regulations 2011; these regulations will be met within this report. The HIA is undertaken to comply with national and regional policy (e.g.: The London Plan 2021).

It is considered good practice to ensure the following during the scoping stage:

- provide reasons for eliminating issues from further consideration; and
- provide a methodology to focus the appraisal on significant issues.

These elements of good practice have been addressed through the identification of sustainability issues. The sustainability issues are described at the end of each of the topic Chapters (5 to 16) of this report and are presented in the detailed IIA Framework in Appendix C.

## 3.2 Scoping Methodology

The following text sets out the approach taken to complete the Stage A tasks outlined in Figure 3.1.

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<sup>13</sup> Environment Agency, Historic England and Natural England



## **Task A1: Identifying other relevant policies, plans and programmes, and sustainability, equalities and health objectives**

The legislative context in which the Local Plan is being prepared can best be understood through a review of related policies, plans, and programmes (PPP). The SEA Regulations require information on:

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

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

The review process ensures that the new Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Local Plan and the IIA (therefore focusing on social, economic, health and equalities matters). Carrying out this review at an early stage of plan development allows for any inconsistencies or constraints within the new Local Plan to be addressed. It also provides the context for the IIA and informs the development of the IIA framework (See Chapter 17).

For practical reasons, the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focused to ensure that only policies that are current and have direct relevance to the Local Plan are reviewed. An outline of the policy documents and their objectives are provided in Appendix A and a summary of the key messages / objectives is provided in Table 4.1 in Chapter 4 of this report.

In some cases, where lower-level plans include the objectives set out at a national or international level, then the national and international plans have not been included.

## **Task A2: Collecting baseline information**

The SEA Regulations require<sup>14</sup> a description of the following to be presented:

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<sup>14</sup> Schedule 2 of the Strategic Environmental Assessment Directive 2004



“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Schedule 2, Paragraph 2);

“the environmental characteristics of areas likely to be significantly affected” (Schedule 2, Paragraph 3);” and

“the likely significant effects on the environment... on issues such as (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape (Schedule 2, Paragraph 6).”

Baseline data enables a characterisation of the plan area to be developed, including the sensitivity of the environment. Gaining an understanding of this information allows the impacts of the plan to be assessed and its performance to be monitored after adoption. Baseline information can put the plan area into context in relation to a national or regional situation or in relation to adjacent areas.

It is, therefore, necessary to collect sufficient information about the current baseline state of Harrow Borough and to predict the future environmental and socio-economic trends to allow effects to be adequately predicted and monitored. The detailed baseline information has been compiled in a series of topics in line with published guidance<sup>15</sup> to include comparators, targets, trends and indicators. The most recent SA Report was prepared for the previous London Borough Harrow Core Strategy and other Development Plan Documents and was published when it was submitted for examination in 2012<sup>16</sup>. This document has been reviewed in the preparation of this IIA Scoping Report and any relevant data transferred into this Scoping Report.

Each baseline topic chapter presents baseline data, the evolution of the baseline without the plan, key sustainability issues and data gaps. Data gaps identifies data which is missing, limited or, for example, studies which are due to be updated or published in the future. Data has been collated from published sources available at the time of writing this scoping report.

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<sup>15</sup> A practical guide to the Strategic Environmental Assessment Directive 2005 ODPM ISBN 1851127887

<sup>16</sup> Harrow Sustainability Appraisal 2012 [Sustainability Appraisal of Submission Development Management, Site Allocations and Area Action Plan DPDs \(harrow.gov.uk\)](#) (Accessed 14/07/23)



### **Task A3: Identifying sustainability issues and problems**

Through consideration of the baseline data and the evolution of the baseline without the plan, a set of key sustainability issues have been identified at the end of each of the topic chapters.

### **Task A4: Developing the IIA assessment framework**

The preparation of this Scoping Report has culminated in the presentation of an IIA Framework of objectives in Chapter 17 of this report; against which the Local Plan and its reasonable alternatives will be tested.

### **A5: Consulting on the scope of the IIA**

This Scoping Report for the new London Borough Harrow Council Local Plan will be consulted on with the statutory consultees and other stakeholders for a period of 5 weeks between 5th October and 9th November 2023.

Comments received on the Scoping Report will be used to inform the next stages of the IIA.

## **3.3 Structure of this Report**

The remainder of this report Chapters 5 to 16 is organised into 12 topic chapters with sub-headings which cover baseline data, sustainability issues, likely evolution without the plan and data gaps. Chapter 4 provides a summary of the review of other relevant plans, policies and programmes. Chapter 17 sets out the proposed IIA framework and Chapter 18 provides a summary of the next steps in the IIA process.

The IIA integrates SEA, SA, EqIA and HIA. The SEA Regulations set out topics which must be considered in an SEA and Table 3.1 demonstrates where these are covered by the IIA topics adopted for this IIA.

<b>Table 3.1: Harrow Borough New Local Plan IIA Topics Compared with SEA Topics</b>	
<b>IIA Topics Adopted for this Assessment</b>	<b>SEA Regulations Topics Required to be Considered</b>
Economy & Employment	Not required by SEA regulations
Population & Equalities	Population
Health	Human Health



<b>Table 3.1: Harrow Borough New Local Plan IIA Topics Compared with SEA Topics</b>	
<b>IIA Topics Adopted for this Assessment</b>	<b>SEA Regulations Topics Required to be Considered</b>
Housing	Material Assets
Transport & Accessibility	Material Assets
Air, Noise & Light	Air
Climatic Factors	Climatic Factors
Biodiversity, Geodiversity, Flora & Fauna	Biodiversity, flora and fauna
Cultural Heritage	Cultural heritage, including architectural and archaeological
Landscape	Landscape
Soils, Water & Minerals	Water Soil
Waste	Not required by SEA regulations





## 4.0 Review of Policies, Plans and Programmes

### 4.1 Introduction

This chapter discusses the policy context in which the London Borough Harrow Council Local Plan is being prepared.

A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 4.1 below outlines the key messages of the PPP.

The key messages provide a summary of the PPP review and have been used to inform an IIA Framework of objectives and sub-objectives which will guide the subsequent appraisal process (see Chapter 17).

### 4.2 Summary of Key Messages

Table 4.1 sets out the key messages drawn from the review of PPP. In Appendix A, some topics have been combined because the PPP related to them overlap or are very similar and therefore the IIA Topics listed in Table 3.1 are not entirely the same as those in the topic chapters 5 to 16 of this document.

The messages presented in Table 4.1 are reflected within the detailed proposed IIA Framework which can be found in Appendix C. A simplified version of the proposed IIA Framework can be found in Chapter 17 of this document.

Table 4.1: Key Messages of the PPP	
IIA Topic	Key Messages from Review
Economy and Employment	<ul style="list-style-type: none"> <li>• Drive productivity and growth in the Borough’s priority areas, particularly the Harrow and Wealdstone Opportunity Area.</li> <li>• Create jobs and prosperity.</li> <li>• Support economic growth and productivity, having regard to local industrial strategies and other local policies for economic development and regeneration.</li> <li>• Encourage long term investment in economic capital, including infrastructure, skills and knowledge.</li> <li>• Promote a dynamic economy that encourages innovation.</li> <li>• Planning policies should set a criteria or identify strategic sites for local and inward investment and seek to address potential barriers to investment.</li> <li>• Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices.</li> <li>• The use of previously developed land and sites that are physically well-related to existing settlements should be encouraged.</li> <li>• Securing investment to deliver world class infrastructure and connectivity.</li> </ul>
Population and Equalities	<ul style="list-style-type: none"> <li>• To ensure fair and equal access to services and support irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity.</li> </ul>



**Table 4.1: Key Messages of the PPP**

<b>IIA Topic</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• There is a need to plan for the housing needs of the older population as well as young families</li> <li>• Provide opportunities for members of the community to mix and meet.</li> <li>• Ensure integrated approach to housing and community facilities and services.</li> <li>• Improve social mobility.</li> <li>• Tackle poverty and inequality.</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Planning policies should aim to achieve healthy, inclusive and safe places.</li> <li>• Improve public health and wellbeing by connecting people with nature.</li> <li>• Increase the proportion of people regularly exercising.</li> <li>• Promote healthier lifestyles and reduce obesity.</li> <li>• Deliver high quality open spaces that meet the needs of local residents and are accessible to all.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Meet future housing need. The NPPF requires local authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.</li> <li>• Ensure that housing growth requirements are accommodated in the most sustainable way.</li> <li>• Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local family housing needs.</li> <li>• There is a need for a mix of housing that will be attractive to older people and those with care needs, including new mixed tenure ‘care ready’ age designated housing.</li> <li>• Ensure there is an adequate supply of adapted households, specifically wheelchair user dwellings.</li> <li>• Ensure an adequate supply of affordable housing in line with the London Plan 2021.</li> <li>• Ensure an adequate number of gypsy and traveller pitches.</li> </ul>
Transport and Accessibility	<ul style="list-style-type: none"> <li>• Contribute to tackling climate change by developing and promoting low carbon travel choices.</li> <li>• Support the move to low emission vehicles.</li> </ul>



**Table 4.1: Key Messages of the PPP**

<b>IIA Topic</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• Encourage sustainable transport and reduce the need to travel.</li> <li>• Make the fullest possible use of public transport, walking and cycling; make cycling and walking a natural choice for shorter journeys.</li> <li>• Create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles.</li> <li>• Have an integrated, well managed and inclusive rights of way and access network.</li> <li>• Local planning authorities should support the expansion of electronic communications networks.</li> </ul>
Air, Noise & Light	<ul style="list-style-type: none"> <li>• Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives.</li> <li>• Reduce contributions to climate change by developing and promoting low-carbon travel choices.</li> <li>• Promotion of walking and cycling as healthy and more preferable options to car for local journeys.</li> <li>• Minimise pollution and other adverse effects on the local and natural environment.</li> <li>• Planning policies should limit the impact of light pollution from artificial light, and noise pollution from development, on local amenity and nature conservation.</li> </ul>
Climatic Factors	<ul style="list-style-type: none"> <li>• Increase resilience to climate change impact through the location, mix and design of development.</li> <li>• Adapt to climate change e.g. considering future climate change risks when allocating development sites.</li> <li>• Manage flood risks in an appropriate way taking account of the needs of the communities and the environment.</li> <li>• Reduce the level of flood risk to the residents of Harrow and include natural flood management where possible which would provide additional benefits to residents compared to traditional hard engineered flood solutions.</li> <li>• Avoid development in areas of flood risk.</li> <li>• Improve flood awareness and emergency planning.</li> <li>• Reducing the need to travel and providing sustainable transport to help mitigate climate change by reducing emissions.</li> <li>• Promote low carbon economies and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.</li> <li>• Minimise the effects of climate change.</li> </ul>



**Table 4.1: Key Messages of the PPP**

<b>IIA Topic</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• Increase the resilience of homes and buildings.</li> <li>• Ensure infrastructure is located, planned, designed and maintained to be resilient to climate change.</li> <li>• Support energy efficiency and other sustainability improvements to existing buildings.</li> <li>• Continue to cut greenhouse gas emissions in order to mitigate the climate emergency declared by Harrow Borough Council.</li> <li>• Maximise the potential of Green Infrastructure.</li> <li>• Encourage the provision of renewable energy. Change to 'provide opportunities for renewable and low carbon energy technologies'.</li> <li>• Increase energy efficiency and move towards a low carbon economy.</li> <li>• Support the aims of the London Plan 2021 for becoming a zero-carbon city by 2050.</li> </ul>
Biodiversity, Geodiversity, Flora & Fauna	<ul style="list-style-type: none"> <li>• Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks.</li> <li>• Provide accessible natural greenspace.</li> <li>• Minimise impacts on biodiversity and provide net gains in biodiversity in line with NPPF and the Environment Act 2021</li> <li>• Need to recognise the wider benefits of ecosystem services.</li> <li>• Biodiversity enhancement in and around development should be led by a local understanding of ecological networks.</li> <li>• Create buffer zones around high-quality habitats.</li> <li>• Plant and manage trees, forests, and woodlands so that they are fit for the future.</li> <li>• Maximise the potential of Green Infrastructure and develop it for healthy communities and ecosystems.</li> <li>• Aim to prevent harm to geological conservation interests.</li> <li>• To maintain and enhance geodiversity through the management of sites, areas and wider landscapes.</li> <li>• To increase recognition of our geodiversity in international, national, regional environmental and planning development policies and legislation.</li> <li>• Support the aims of the London Plan 2021 for enriching biodiversity and geodiversity.</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• Conserve and enhance, international, national and local designated heritage assets including locally significant historic buildings and heritage assets.</li> </ul>



**Table 4.1: Key Messages of the PPP**

<b>IIA Topic</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• Protect and conserve the historic environment, heritage assets and their settings.</li> <li>• Improve the condition of heritage 'at risk' in the Borough.</li> <li>• Maintain and enhance access to cultural heritage assets.</li> <li>• Preserve and enhance Conservation Areas in Harrow Borough.</li> <li>• Ensure development in or adjacent to Conservation Areas or Listed buildings (and their settings) respects their character and context and enhances the quality of the built environment.</li> <li>• Ensure that any alterations or repairs to traditional buildings preserve and where possible, improve the character and appearance of the building.</li> <li>• Promote the use of sustainable materials.</li> <li>• Protect the historic environment for the benefit of our own and future generations.</li> <li>• Maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and enhance valued landscapes, biological and geological conservation interests, and soils. Harrow on the Hill and Harrow Ridge Weald are considered as the most important landscape features in Harrow.</li> <li>• Recognise the wider benefits from natural capital and ecosystem services.</li> <li>• Seek to promote or reinforce local distinctiveness.</li> <li>• Recover nature and enhance the beauty of landscapes.</li> <li>• Maintain and enhance the overall quality and diversity of landscape character across the Borough.</li> <li>• Seek to protect Green Belt and Metropolitan Open Land across the Borough.</li> <li>• Maximise the potential of Green Infrastructure.</li> <li>• Promote connectivity between residents and open spaces through the Harrow Green Grid.</li> <li>• There are major economic benefits to be gained from natural capital and their value should be considered and incorporated into decision-making in relation to land use.</li> </ul>
Soils, Water & Minerals	<ul style="list-style-type: none"> <li>• Promote sustainable use of water as a natural resource.</li> <li>• Improve water efficiency.</li> <li>• Promote sustainable and water efficient development.</li> <li>• Ensure that water quality is improved or maintained where possible.</li> <li>• Prevent pollution of groundwater.</li> <li>• Minimise the amount of water lost through leakage each year.</li> </ul>



<b>Table 4.1: Key Messages of the PPP</b>	
<b>IIA Topic</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• Planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.</li> <li>• Meet national and localised water quality and wastewater targets.</li> <li>• Harrow waterways and their corridors will create and nurture high value wildlife habitats and contribute to minimising the impact of climate change.</li> <li>• Remediate land contamination.</li> <li>• Protect soil quality and avoid soil pollution.</li> <li>• Encourage the use of previously developed (brownfield) land.</li> <li>• Effective soil protection during construction.</li> <li>• Sustainable management of soils. To promote the efficient supply and use of minerals.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Ensure the design and layout of new development supports sustainable waste management.</li> <li>• Encourage and support with Circular Economy where possible.</li> <li>• Waste should be managed in line with the waste hierarchy:                             <ul style="list-style-type: none"> <li>○ Prevent or reduce waste;</li> <li>○ Reuse;</li> <li>○ Recycle;</li> <li>○ Other recovery methods; and</li> <li>○ Dispose.</li> </ul> </li> <li>• Meet national, regional and localised waste targets including those on landfill, reuse and recycling.</li> <li>• Safeguard existing waste management sites</li> <li>• To provide protection to the local environment and residents, whilst ensuring the provision of waste management facilities in accordance with Government policy and society’s needs.</li> </ul>

The following chapters set out the current baseline situation for each topic. For each chapter, all collated baseline data of relevance to the IIA of the Local Plan is presented. It is worth noting that whilst every effort has been made to collate all data of relevance, the data presented is not exhaustive due to time constraints. As part of the baseline review key sustainability issues are identified and described. In addition, data gaps and the potential evolution within the Local Plan area without any further action has been detailed for each topic.



## 5.0 Economy and Employment

### 5.1 Baseline

Within the Borough, 81.1% of the working population (16-64 years) were economically active between January 2022 and December 2022. This is higher than the London and national averages of 79.8% and 78.5% respectively<sup>17</sup>. The combination of an increasing Borough population and high levels of economically active residents have produced modest employment growth forecasts; an increase of 8,000 jobs is expected to be created in Harrow over the period 2016-2036. Employment is expected to reach its peak of 93,000 jobs between 2041-2050<sup>18</sup>.

The Harrow Economic Strategy suggests that a disproportionate impact was experienced in Harrow in relation to unemployment during the COVID-19 pandemic. From February 2020 to April 2021 the Borough experienced an increase of over 5% of residents claiming unemployment benefits. 18–24-year-olds were particularly impacted, with claimants increasing by 8%. Residents employed in low paid/skilled jobs- such as in the service industry- experienced the most unemployment. Harrow Council implemented a range of measures to try and get the local economy back on track following the end of the pandemic, including distributing £62 million in grants to over 900 local businesses, and expanding English Speaking for Other Languages (ESOL) and employability provision to deliver outreach services<sup>19</sup>.

Prior to the pandemic, it was estimated that over 22% of residents commuted into Central London, whilst a similar level commuted to neighbouring Boroughs of Brent, Hillingdon, Barnet and Ealing. 40% of Harrow's residents were estimated to work within the Borough<sup>20</sup>. These figures are likely to have changed since the pandemic to reflect an increase in the number of residents working remotely. In 2021 the Census recorded a relatively high proportion of people living and working in the Borough. The proportion of Harrow residents travelling 20km or more to work was very low (5.1%) compared to the London average (30.3%)<sup>21</sup> and the level of homeworking recorded in Harrow in 2021 was 36.1%<sup>22</sup>, a significant increase from 2011 (15.9%)<sup>23</sup>. Within Harrow, 47% of residents that commute, choose to do so by private car. This figure is higher than the London average of 36%<sup>24</sup>.

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<sup>17</sup> Nomis Labour Market Profiles: Harrow. [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk) (Accessed 04/07/23)

<sup>18</sup> Harrow Local Economic Assessment 2019-2020- Issues and Analysis. [issues-and-analysis.pdf \(harrow.gov.uk\)](https://www.harrow.gov.uk) (Accessed 14/07/23)

<sup>19</sup> Harrow Economic Strategy [Draft Economic Strategy - Appendix 1.pdf \(harrow.gov.uk\)](https://www.harrow.gov.uk) (Accessed 18/07/23)

<sup>20</sup> Harrow Local Economic Assessment 2019-2020- Issues and Analysis. [issues-and-analysis.pdf \(harrow.gov.uk\)](https://www.harrow.gov.uk) (Accessed 04/07/23)

<sup>21</sup> Census 2021: Distance Travelled to Work [Distance travelled to work - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk) (Accessed 04/07/23)

<sup>22</sup> Census 2021: Method Used to Travel to Work. [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk) (Accessed 04/07/23)

<sup>23</sup> Travel to Work Data 2011 Census. [ONS published some new population estimates by ethnic group last Thursday \(26 January 2006\) \(harrow.gov.uk\)](https://www.harrow.gov.uk) (Accessed 04/07/23)

<sup>24</sup> Method use to travel to work. [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk) (Accessed 12/07/23)



A key aspect of remote working is having access to reliable and high-speed broadband, to support employment needs. As a result, Harrow Council are aiming to improve the Borough’s digital infrastructure, advance digital inclusion, and enhance digital knowledge, in order to support sections of the economy that now rely on remote working. More specifically, in 2022 a new partnership between Harrow Council and Community Fibre was created to provide 100% full fibre broadband across Harrow. Once works are complete, thousands of Harrow residents can choose faster internet speeds, including wired speeds up to 3 Gbps (up to 650 Mbps over Wi-Fi), which are up to 59x faster than the UK average download speed<sup>25</sup>. These efforts will also support vulnerable or disadvantaged residents that have previously been excluded from access to technology<sup>26</sup>.

As seen in Table 5.1, average weekly earnings in 2022 for people who work full time in Harrow Borough were higher than the average for neighbouring Borough’s Brent and Ealing, as well as London and Great Britain. Average weekly earnings for men were significantly higher for women in the Borough, compared to women. The Mayor’s Economic Development Strategy for London (2018) suggests that despite higher than average earnings, wage growth remains fairly flat, forcing some Londoners into poverty or debt<sup>27</sup>.

Table 5.1: Average Weekly Earnings (£), 2022					
	Harrow (£)	Brent (£)	Ealing (£)	London (£)	Great Britain (£)
Full time	798.8	678.6	711.7	765.4	642.2
Male full time	882.6	722.8	718.9	804.9	687.5
Female full time	695.0	594.8	670.7	713.7	584.5

Source: Nomis Labour Market Profiles: Earnings by Place of Work (2022)

Unemployment rates within the Borough stood at 4.2% between January 2022 and December 2022. Unemployment rates in Harrow are lower than the London average (4.4%), but higher than the Great Britain average (3.6%)<sup>28</sup>. Unemployment amongst long-term benefit claimants is highlighted as a particular issue. There will need to be training opportunities in place for those returning to work after claiming benefits, in order to support them in becoming skilled workers<sup>29</sup>.

<sup>25</sup> [100% Full Fibre Broadband comes to Harrow – London Borough of Harrow](#) (Accessed 29/08/23)

<sup>26</sup> Harrow Economic Strategy. [Draft Economic Strategy - Appendix 1.pdf \(harrow.gov.uk\)](#) (Accessed 18/07/23)

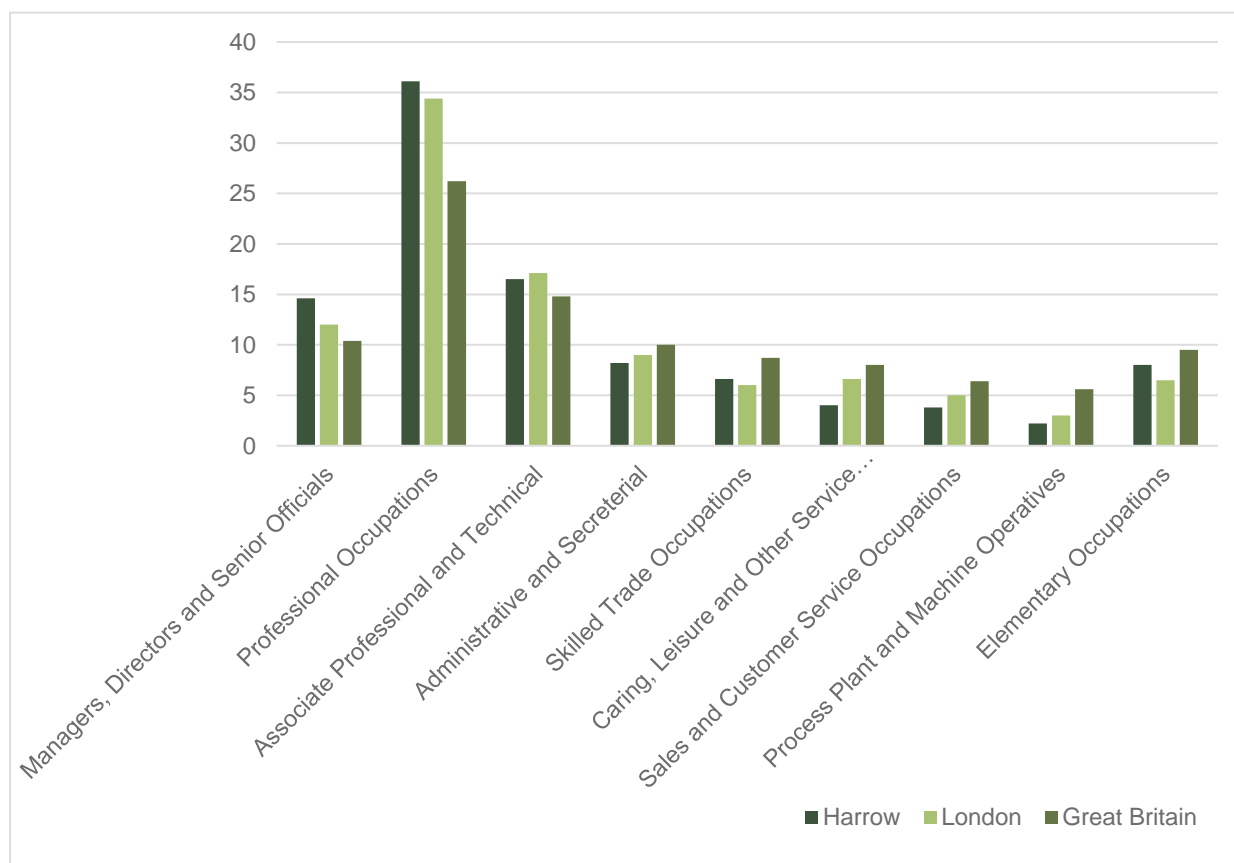
<sup>27</sup> [The Mayor’s Economic Development Strategy for London](#) (Accessed 04/09/23)

<sup>28</sup> Nomis Labour Market Profiles: Harrow. [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#) (Accessed 04/07/23)

<sup>29</sup> Harrow Local Economic Assessment [issues-and-analysis.pdf \(harrow.gov.uk\)](#) (Accessed 04/09/23)







**Figure 5.1: Employment by Occupation within Harrow, London and Great Britain (Source: Nomis Labour Market Profiles: Employment by Occupation 2022)**

Figure 5.1 depicts that a slightly higher proportion of workers in Harrow (14.6%) have senior official and director positions than those in London as a whole (12%), and nationally (10.4%). The highest proportion of workers in the Borough are employed in professional occupations, which includes health, education, and engineering professionals. The proportion of those in Harrow employed in associate professional and technical roles (16.5%) is slightly lower than across London (17.1%), but higher than the national average (14.8%). These figures suggest that the Borough holds a relatively well skilled and qualified workforce. In 2021, there were 15,355 businesses located within Harrow Borough, of which 93.9% employ nine people or less. Around 87% of all businesses in the Borough are considered as micro-enterprises, as they only employ 4 people or less. This is the highest proportion of microbusinesses of all West London Boroughs. Only 20 businesses (around 0.1%) in the Borough employ 250 or more employees<sup>30</sup>. The prevalence of micro, small and medium business in the Borough has allowed for specific objectives to be created. The Harrow Economic Strategy (2021-2030) highlights how these enterprises are being supported in order to in relation to address low productivity, enhance social

<sup>30</sup> Nomis Labour Market Profiles: Harrow. [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk) (Accessed 04/07/23)



value within supply chains, increase businesses' ability to pay London Living Wage, and address income inequality growth and job creation<sup>31</sup>.

Overall, there has been an increase in the number of business start-ups since 2004; in 2018 2,585 businesses were started in Harrow. There were however 2,140 business closures in the same year. Professional, scientific and technical businesses are found to be the most prevalent business start-ups, closely followed by construction services. Despite there being an overall increase in the number of business start-ups in the last 20 years, survival rate has decreased over time. In 2007, business survival rate (based on survival of two years) in Harrow was 84%; the last recorded year (2016) shows that this had reduced to 69.4%<sup>32</sup>. These figures are higher than the London average however, which recorded 79.1% and 68.5% survival rates respectively in the same period.

Wealdstone accommodates most of the Borough's industrial and business land and has strong legacy with key manufacturing firms. Honeypot Lane Strategic Industrial Location is also a large provider of industrial and business land. However, perceived access constraints and competition from industrial locations in neighbouring Boroughs have reduced activity across these sites in recent years. The closing of large manufacturers such as Kodak, has also reduced industrial activity within Harrow<sup>33</sup>.

Similarly, activity in Harrow Metropolitan town centre has reduced over time. Harrow town centre contains a low amount of commercial floorspace, with the Borough holding the smallest level of retail, industrial and office space in West London. Between 2001 and 2019, the total floorspace occupied by offices in the Borough reduced by 41%.<sup>34</sup> This is a result of competition from nearby Boroughs, as well as land use change, such as conversions to housing. As a result, there is a need to maintain and improve the business/employment base in the Borough, and to improve the vibrancy and viability of Harrow Town Centre, in order to maintain its status as a Metropolitan Centre.

There is also a need to provide new office and light industrial accommodation, including a range of size of units for micro-businesses, SMEs and move-on space<sup>34</sup>. However, the Borough has a limited level of employment land and no capacity to provide additional land, except via the redevelopment/intensification of existing sites.

In 2019, it was estimated that Harrow contained 319,000m<sup>3</sup> of retail space<sup>35</sup>. However, this is likely to have decreased following significant retail closures; this is a consequence of reduced footfall related to the COVID-19 pandemic, as well as changes to consumer shopping habits- there has been a surge in online shopping in the past few years. Mid-2021 figures estimate shop frontage vacancy rates to be around 13% across Harrow, compared to 7.2% in early 2020<sup>36</sup>. In 2019, the town

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<sup>31</sup> Harrow Economic Strategy [Public Health Greenspace Report \(harrow.gov.uk\)](#) (Accessed 04/09/23)

<sup>32</sup> Harrow Local Economic Assessment [business-and-enterprise.pdf \(harrow.gov.uk\)](#) (Accessed 04/07/23)

<sup>33</sup> Harrow Local Economic Assessment [town-centres-offices-and-industrial-estates \(harrow.gov.uk\)](#) (Accessed 19/07/23)

<sup>34</sup> Harrow Local Economic Assessment [issues-and-analysis.pdf \(harrow.gov.uk\)](#) (Accessed 04/09/23)

<sup>35</sup> Harrow Local Economic Assessment [town-centres-offices-and-industrial-estates \(harrow.gov.uk\)](#) (Accessed 19/07/23)

<sup>36</sup> Harrow Economic Strategy [Draft Economic Strategy - Appendix 1.pdf \(harrow.gov.uk\)](#) (Accessed 19/07/23)



centres with the highest vacancy rate were Burnt Oak (6.7%), followed by Wealdstone (5.9%), North Harrow (4.9) and Rayners Lane (4.9%)<sup>37</sup>. In order to address issues of retail vacancy, new investment could be attracted into the area.

Figure 5.2 showcases key economic areas within Harrow.

Harrow and Wealdstone Opportunity Area was designated in 2011 with the intention of regenerating and intensifying the central area of Harrow, in order to support growth. Provision was made for at least 3,000 additional jobs. Aims were also created relating to increasing Harrow's office stocks to meet local business needs, and increasing retail, leisure and hotel provision within Harrow and Wealdstone town centres<sup>38</sup>. The area is further highlighted as holding an indicative capacity of 1000 jobs, along the Highspeed 2/Thameslink Growth Corridor<sup>39</sup>.

The London Plan 2021 has also identified Burnt Oak District Centre as a strategic area for regeneration, due to its high residential development potential<sup>40</sup>.

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<sup>37</sup> Harrow Local Economic Assessment [town-centres-offices-and-industrial-estates \(harrow.gov.uk\)](https://www.harrow.gov.uk/town-centres-offices-and-industrial-estates) (Accessed 19/07/23)

<sup>38</sup> Harrow and Wealdstone Area Action Plan [harrow-wealdstone-area-action-plan.pdf](https://www.harrow.gov.uk/harrow-wealdstone-area-action-plan.pdf) (Accessed 02/08/23)

<sup>39</sup> The London Plan 2021. [the london plan 2021.pdf](https://www.london.gov.uk/plan-and-policy/london-plan-2021) (Accessed 02/08/23)

<sup>40</sup> The London Plan 2021. [the london plan 2021.pdf](https://www.london.gov.uk/plan-and-policy/london-plan-2021) (Accessed 04/09/23)



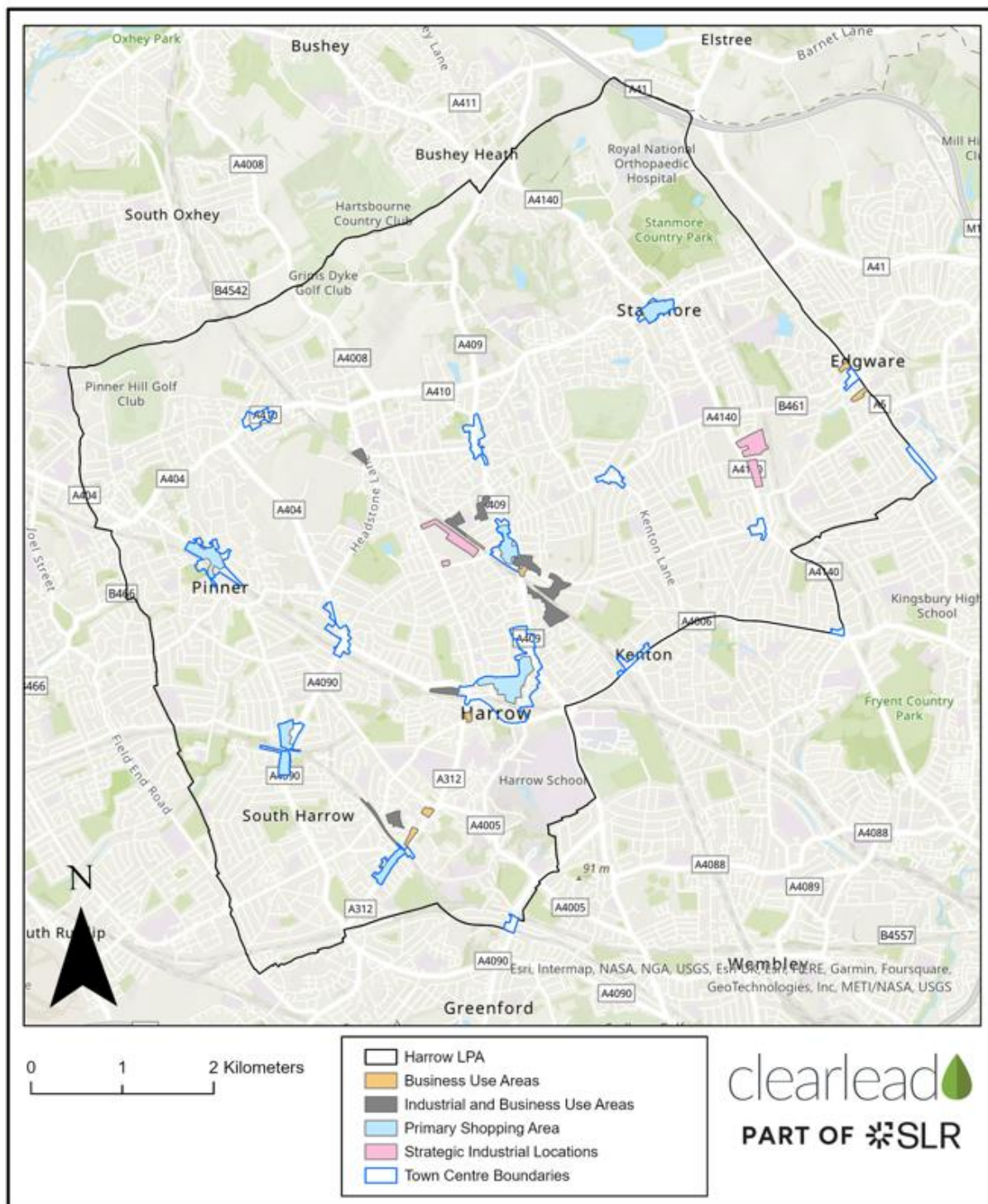


Figure 5.2: Key economic areas within Harrow Borough



## 5.2 Sustainability Issues

The following sustainability issues have been identified:

- Around 9 out of 10 businesses in the Borough employ less than 10 staff;
- In 2022, average weekly earnings for men were significantly higher for women in the Borough, compared to women;
- A disproportionate impact was experienced in Harrow in relation to unemployment during the COVID-19 pandemic. The Borough experienced an increase of over 5% of residents claiming unemployment benefits. 18–24-year-olds were particularly impacted. Residents employed in low paid/skilled jobs- such as in the service industry- experienced the most unemployment;
- There is a need to reduce the number of unemployed residents on claimant benefits, and encourage them to re-enter the workforce;
- There is a small number of large businesses in the Borough, creating vulnerability in the instance of business death and job loss;
- In 2019, the town centres with the highest vacancy rate were Burnt Oak, followed by Wealdstone, North Harrow and Rayners Lane.
- There is a need to attract more investment into the town centres of the Borough, particularly Harrow Town Centre in order to maintain its status as a Metropolitan Town Centre.
- There is reduced economic activity in Harrow town centre and Wealdstone industrial area;
- There is a need to support new and young businesses in the Borough to improve business survival rates; and
- A large number of residents utilise private transport in the form of petrol or diesel cars to commute to work.

## 5.3 Likely Evolution without the Local Plan

Current trends are showing a decline in available retail and commercial floor space due to pressures from housing development. Given the proportion of economically active people within the borough without the plan there is a risk that economic growth could be limited.

## 5.4 Data Gaps

Due to a small sample size, some of the data obtained from Nomis was too small to provide a reliable estimate. Some of the data such as economic data is updated regularly so the baseline data provided in this report is based on a snapshot of available data at the time of writing the report.

Certain data- such remote working rates and retail space- have not been updated since the middle of, or prior to, the pandemic; it is therefore difficult to determine whether data points are reliable.

The Harrow Economic Development Needs Assessment is currently being updated; once complete, relevant data will be incorporated into this report.



## 6.0 Population and Equalities

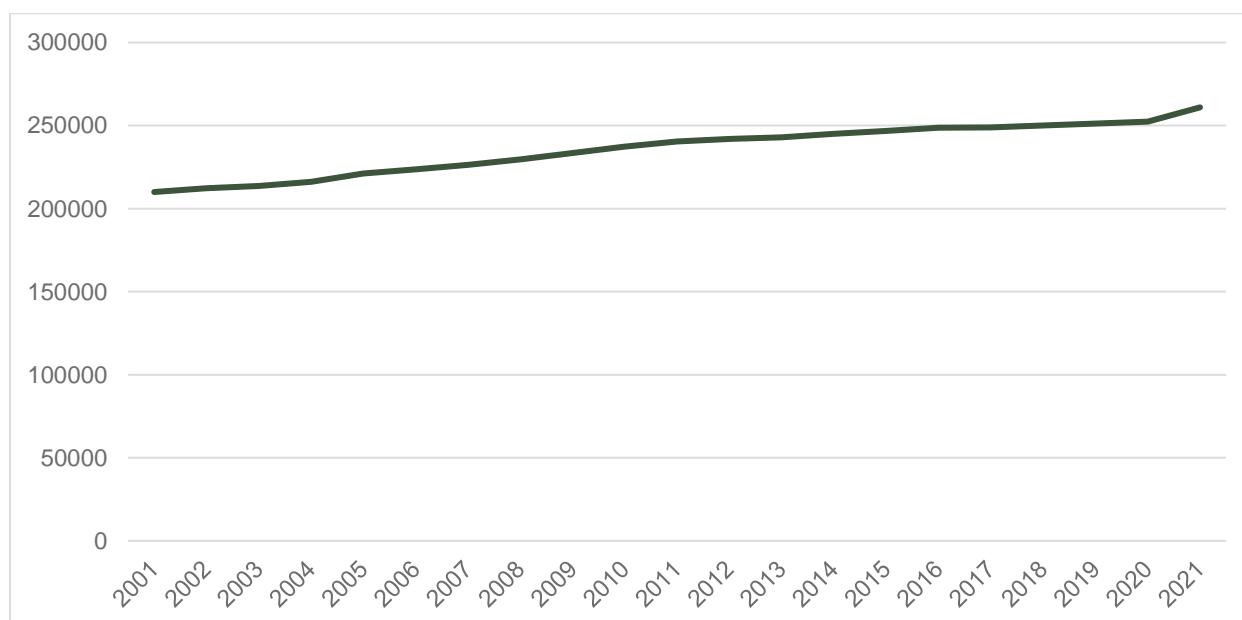
The following section reviews the baseline data related to population and equalities demographics. The following Personal Protected Characteristics are therefore acknowledged in this section: Age; Gender; Marriage and civil partnership; Race; Religion or belief; and Sexual orientation. This baseline data will help to inform the Equalities Impact Assessment (EqIA). The remaining Personal Protected Characteristics of Pregnancy and maternity and Disability are discussed in Section 7 (Health).

### 6.1 Baseline

#### Population

In 2021, the estimated population of Harrow Borough was 261,300. There has been a year-on-year increase since 2011, which has resulted in an overall population increase of 9.3%. This is higher than the increase for London (7.7%)<sup>41</sup>. This growth can be seen in Figure 6.1. The latest population density estimate is 5,178 persons per km<sup>2</sup>; Harrow is more densely populated than Hillingdon (2,644 persons per km<sup>2</sup>), but less densely populated than Brent (7,859 persons per km<sup>2</sup>)<sup>42</sup>. By 2041, Harrow's population is predicted to be 272,536<sup>43</sup>.

There has been an increase in the number of families present in the Borough since 2011; households with dependent and non-dependent children make up for 58% of the increase to households. This suggests that a growing proportion of the population is young families<sup>44</sup>.



<sup>41</sup> [Harrow population change, Census 2021 – ONS](#) (Accessed 05/07/23)

<sup>42</sup> 2021 Census: First Release [2021 Census – Census – London Borough of Harrow](#) (Accessed 05/07/23)

<sup>43</sup> Overview of Harrow's population and changes [Background Paper - 2021 Annexe 2 - Overview of Harrows population and changes.pdf](#) (Accessed 19/07/23)

<sup>44</sup> [Census change over time data, England and Wales - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 02/08/23)



### **Figure 6.1: Population growth in Harrow 2001-2021 (Source: London Borough Harrow Council- Overview of Harrow's Population and Changes)**

#### **Age**

In 2021, 40,200 (15.4%) of residents were aged 65 years and over<sup>45</sup>. Since 2011, the number of Harrow residents falling into this age bracket has increased by 19.4%. By 2031, it is predicted that 19.7% of Harrow's residents will be aged 65 or older<sup>46</sup>. There has been a similar increase in the number of children in the Borough. In 2021, 48,300 (18.5%) of residents were aged 15 years and under. Since 2011, the number of Harrow residents falling into this age bracket has increased by 7.5%. In 2031, it is predicted that 19.5% will be aged 15 or younger.

These figures suggest that by 2031, a relatively large proportion of the population (39.2%) will be non-working dependents. This is likely to impact infrastructure needs in the Borough, with further pressure being created for the provision of suitable housing, as well as school and healthcare places. Radical changes to health and social care systems will be needed in order to provide appropriate care for the ageing population<sup>47</sup>.

Figure 6.2 highlights the predicted age range of Harrow's population in 2030.

#### **Marriage and Civil Partnership**

Since 2011, there has been a slight increase (0.9%) in the percentage of people aged 16 and over who have never been married/in a civil partnership; this accounts for 33.2% of Harrow's adult population. However, the percentage of people who are married/in a civil partnership is higher than those who aren't (53.9%)<sup>48</sup>.

#### **Gender**

In 2021, the estimated female population of Harrow Borough was 132,400, and the male population 128,800<sup>49</sup>. By 2030, 50.8% of residents are predicted to be male, and 49.2% predicted to be female, suggesting that the number of male residents in the Borough is going to overtake the number of female residents in the next decade<sup>50</sup>. Predicted gender split by age can be seen in Figure 6.2.

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<sup>45</sup> [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 27/07/23)

<sup>46</sup> [Population projections – local authorities: SNPP Z1 - Office for National Statistics](#) (Accessed 05/07/23)

<sup>47</sup> Ready for Ageing? [Microsoft Word - FINAL Public Services Report \(parliament.uk\)](#) (Accessed 05/09/23)

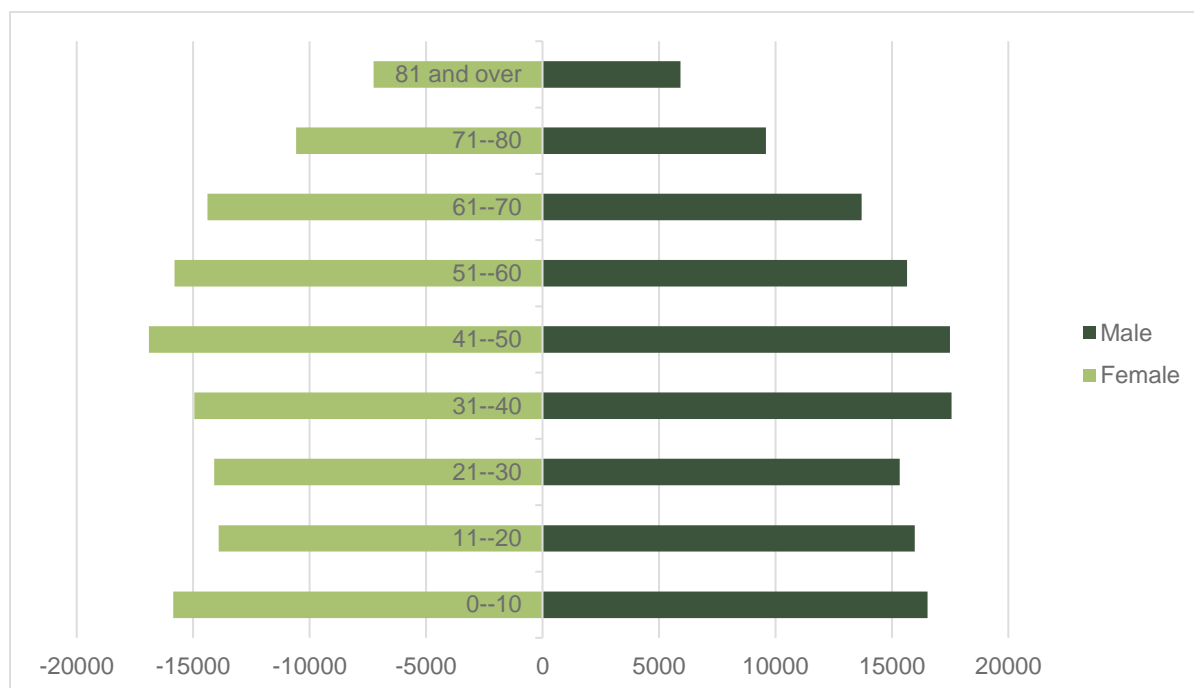
<sup>48</sup> Changing Relationships in Harrow [How life has changed in Harrow: Census 2021 \(ons.gov.uk\)](#) (Accessed 11/07/23)

<sup>49</sup> [Sex - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 29/08/23)

<sup>50</sup> Population Projections for Local Authorities

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2> (Accessed 05/07/23)





**Figure 6.2: 2030 gender predictions in Harrow, split by age category (Source: ONS 2018- Population Projections for Local Authorities)**

### Sexual Orientation

The 2021 Census recorded sexual orientation in Harrow Borough for the first time. 12.8% of residents stated that they belonged to the LGBTQ+ community, with 87.2% regarding themselves as heterosexual<sup>51</sup>.

### Ethnicity

Harrow can be considered as a very diverse community, with more than half of residents identifying as part of an ethnic minority<sup>52</sup>. More specifically, in the 2021 Census, over 45% of Borough residents identified themselves as Asian, Asian British or Asian Welsh, 36.5% identified as White, and 7.3% identified themselves as Black, Black British, Black Welsh, Caribbean or African. The remaining residents identified themselves as being mixed or multiple ethnic groups, or 'other'. This diversity is highlighted in Figure 6.3.

Harrow Borough Council recently undertook an investigation into race inequalities in the workplace and have since published recommendations of actions to eliminate any form of discrimination from the workplace<sup>53</sup>.

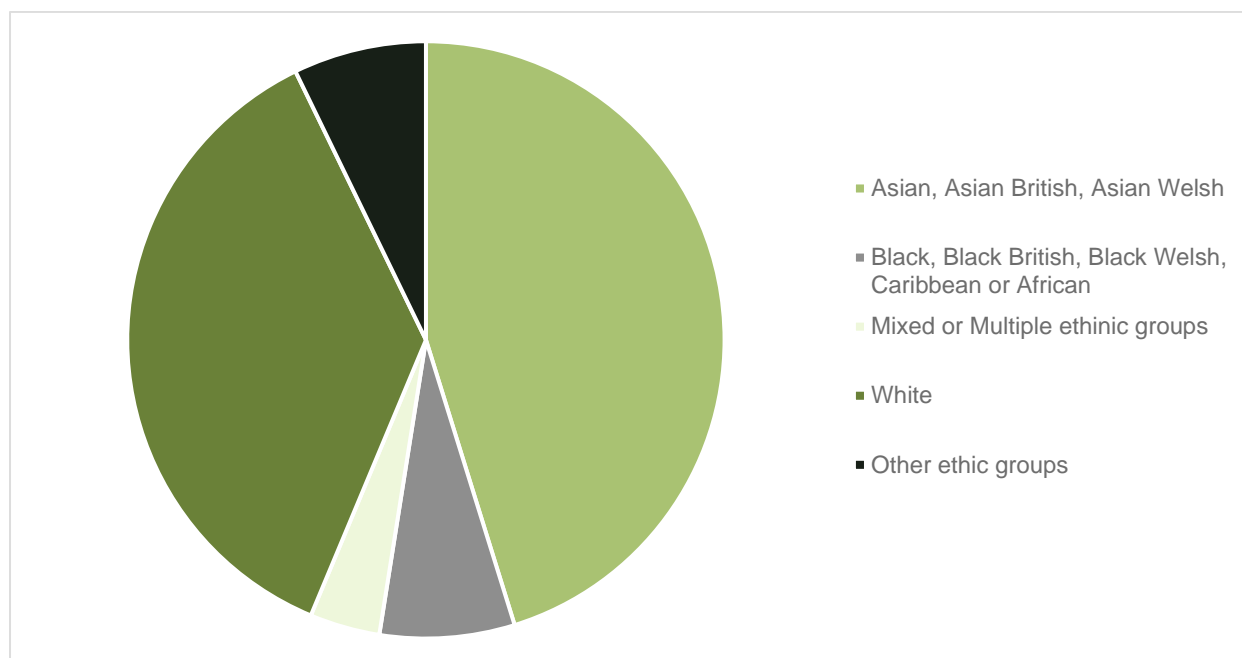
<sup>51</sup> [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 05/07/23)

<sup>52</sup> [How life has changed in Harrow: Census 2021 \(ons.gov.uk\)](https://ons.gov.uk)

<sup>53</sup> Findings of the equalities survey of Harrow staff and internal stakeholders on race. [Background paper 1 - Independent Race Report.pdf \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 02/08/23)







**Figure 6.3: Ethnicity in Harrow (Source: ONS 2021- How Life has Changed in Harrow)**

### Religion/Belief

There are a number of different religions and beliefs present across the Borough. The 2021 Census records 83.5% of Harrow's population hold some form of religion/belief. The most prominent religion held is Christianity (33.9%), followed by Hinduism (25.8%), Islam (15.9%), Judaism (2.8%), and Buddhism (1.1%). Over a tenth of the Borough hold no religion or belief system. The percentage of residents defining themselves as Muslims has increased the most since 2011, with a growth of 3.4%. In contrast, the percentage of residents defining themselves as Christians has declined since 2011<sup>54</sup>.

### Deprivation

The English Indices of Deprivation 2019 attempts to measure a broad concept of multiple deprivation at the small area level. The Indices provide a set of relative measures of deprivation for small areas (LSOAs (Lower Super Output Areas)) across England, based on seven different domains of deprivation:

- Income Deprivation;
- Employment Deprivation;
- Education, Skills and Training Deprivation;
- Health Deprivation and Disability;
- Crime; and
- Barriers to Housing and Services.

<sup>54</sup> Religion in Harrow. [How life has changed in Harrow: Census 2021 \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 11/07/23)



According to the 2019 Indices, Harrow is ranked 207<sup>th</sup> most deprived local authority in England, out of 317 English local authorities nationally (where 1 is the most deprived and 317<sup>th</sup> is the least deprived). This has improved from the previous ranking of 132<sup>nd</sup> out of 326 English local authorities in 2015, and 90<sup>th</sup> in 2010. Overall, Harrow is the seventh least deprived London Borough for this Index<sup>55</sup>.

Table 6.1 shows the average rank of each of the Boroughs surrounding Harrow.

Local Authority	Overall Rank	Income	Employment	Education	Health	Crime	Housing	Environment
Harrow	207	156	227	301	293	163	15	156
Barnet	184	149	205	302	298	113	21	91
Brent	49	65	122	225	207	49	3	54
Ealing	88	94	146	253	189	79	6	46
Hillingdon	151	142	197	209	193	81	27	136

Source: Ministry of Housing, Communities and Local Government 2019- English Indices of Deprivation 2019

The Borough is ranked 156,317 for income deprivation affecting children, indicating that 12.3% of children in Harrow live in families experiencing income deprivation<sup>57</sup>. This is lower than the England average of 17.1%<sup>58</sup>. In 2020/21, 36% of children in the Borough lived in households with an income of less than 60% the UK median (after housing costs have been subtracted)<sup>59</sup>.

As shown in Table 6.1, Housing has a particularly high level of deprivation in Harrow, as well as surrounding Boroughs. This sub-domain measures the physical and financial accessibility of housing and services. This therefore suggests that housing deprivation in Harrow is a result of poor access to services and good quality housing, as well as issues of affordability.

Levels of deprivation can be considered spatially. Clusters of high deprivation exist to the North and South of the Borough, as well as within the Centre. Overall, the most deprived ward is Wealdstone, found in the centre of the Borough. The least deprived ward is Pinner South, found to the West of the Borough. In terms of housing deprivation however, Stanmore Park was the most deprived ward, whereas Headstone North was the least deprived ward<sup>60</sup>. These findings are further supported by the high concentration of social housing in the most deprived

<sup>55</sup> Harrow Vitality Profiles 2018-2019- Deprivation [deprivation.pdf \(harrow.gov.uk\)](#) (Accessed 05/07/23)

<sup>56</sup> [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#) (Accessed 05/07/23)

<sup>57</sup> [harrow-index-of-multiple-deprivation-summary-2019.pdf](#) (Accessed 28/09/23)

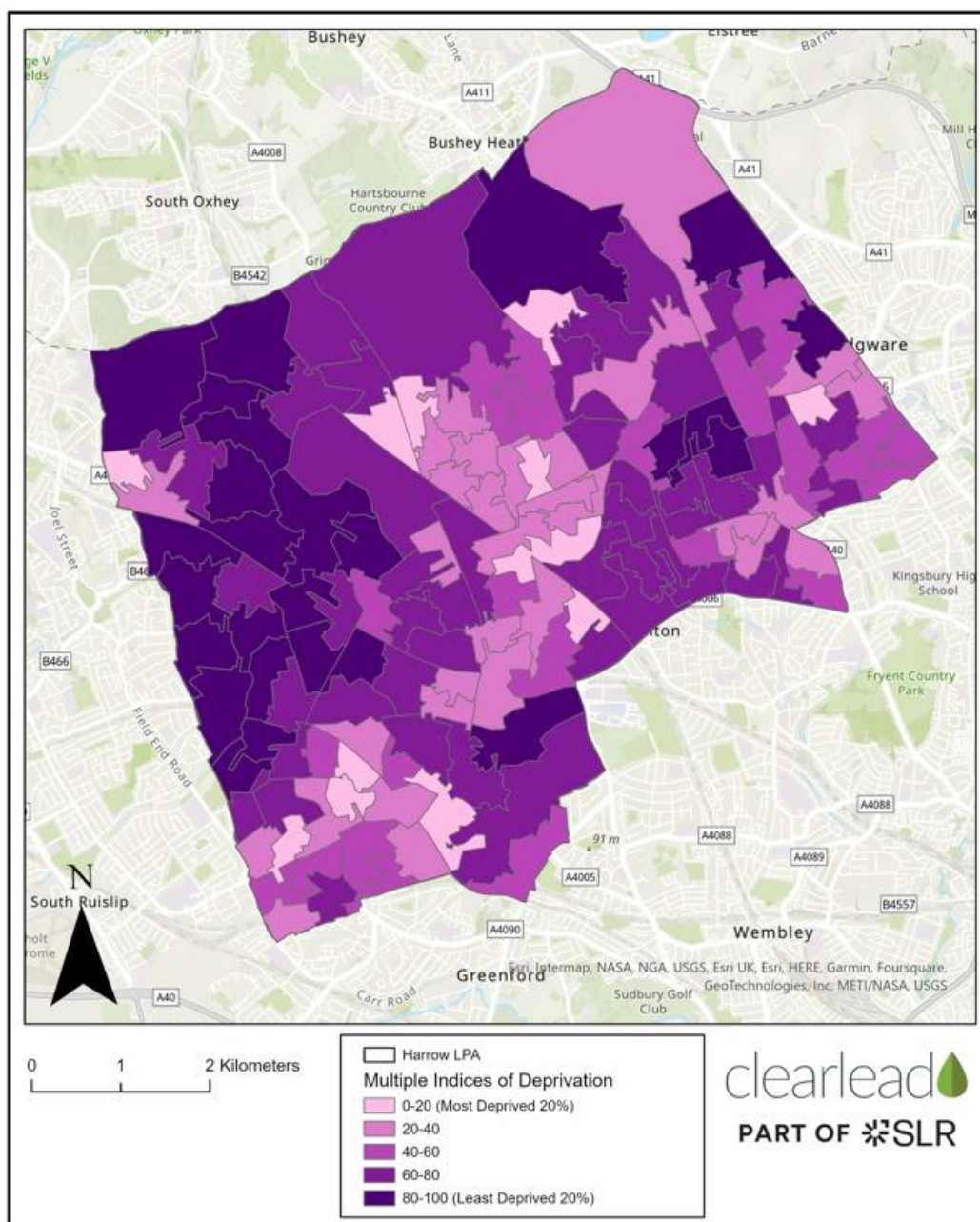
<sup>58</sup> Harrow Public Health Profile. [Public health profiles - OHID \(phe.org.uk\)](#) (Accessed 27/07/23)

<sup>59</sup> Trust for London [Poverty & Inequality Data Harrow | Trust For London | Trust for London](#) (Accessed 27/07/23)

<sup>60</sup> 2019 Indices of Deprivation- Harrow Summary [2019 Indices of deprivation \(harrow.gov.uk\)](#) (Accessed 12/07/23)



neighbourhoods<sup>61</sup>. The differing levels of deprivation within Harrow can be seen in Figure 6.4.



**Figure 6.4: Levels of deprivation across Harrow Borough (Source: Ministry of Housing, Communities and Local Government 2019- English Indices of Deprivation 2019 Mapping Resources)**

## Education

There are 66 schools in Harrow, including 41 primary, 13 secondary and 3 sixth form. Harrow School is well-known independent school founded under Royal Charter

<sup>61</sup> Harrow Vitality Profiles 2018-2019- Deprivation [deprivation.pdf \(harrow.gov.uk\)](https://www.harrow.gov.uk/deprivation.pdf) (Accessed 05/09/23)



in 1572, and has since produced a number of notable alumni, including Winston Churchill.

With regards to educational attainment, 44.9% of residents aged between 16-64 hold level four or higher qualifications. This is higher than the national average, which sits at 33.8%. 13.9% of Borough residents aged between 16-64 have no qualifications, and 8.1% hold level one qualifications<sup>62</sup>.

Over the last 10 years, Harrow has experienced an increased demand for primary and secondary school places, as a result of population increases. This is in line with increased demand across London; 8,728 new school places were needed across London in 2022/23. Within Harrow, the Central Planning Area (Harrow and Wealdstone Opportunity Area) indicates the largest shortfall of pupil places over time, due to being an area of significant housing development. Although the need for primary school places appears to be falling, deficit of both primary and secondary school places in this area is expected to persist until 2035, where it is predicted that there will be around 277 deficit primary school places<sup>63</sup>.

A number of mitigation measures have been put in place in order to alleviate the pressure on schools across the Borough. For example, the development of two new primary schools has been approved in response to this demand- Harrow View Primary School and Hujjat Primary School<sup>64</sup>. Additionally, hundreds of extra permanent school places have been created across the Borough.

There are four Specialist Schools in Harrow, for residents with learning disabilities. These include:

- Kingsley High School: 11-19 year old pupils with severe and complex needs including autism;
- Woodlands School: 3–11-year-old pupils with severe and complex needs including autism;
- Shaftesbury High School: 11–19-year-old pupils with moderate learning difficulties, autism, and/or behaviour, emotional or social difficulties: and
- Alexandra School: 4–11-year-old pupils with moderate learning difficulties, autism, and/or behaviour, emotional or social difficulties

There is also specialist resourced provision at mainstream schools for students with autism, or physical, hearing or language impairments. The Special Education Needs and Disabilities Strategy in Harrow highlights that there is a need to increase provision further, in order to support young residents with disabilities<sup>65</sup>. From September 2021 to September 2026 Harrow will require on average 1215 additional new severe learning difficulties (SLD) places per year<sup>66</sup>.

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<sup>62</sup> Highest level of qualification by local authority. [Highest level of qualification - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 11/07/23)

<sup>63</sup> School Roll Projections [DEMOGRAPHIC INFORMATION \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 05/09/23)

<sup>64</sup> Harrow Annual Monitoring Report [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 05/09/23)

<sup>65</sup> [DRAFT Special Educational Needs and Disability Strategy 2015 – 2020 \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 27/07/23)

<sup>66</sup> Harrow Draft Infrastructure Development Plan (Accessed 29/09/23)



## Crime

Victim based crime rates within the Borough were recorded at 19.89 crimes per 1000 population at the end of 2022. This figure is lower than the London average (24.49 crimes per 1000), the average in neighbouring Brent (28.98 crimes per 1000), and the Ealing average (27.19 crimes per 1000)<sup>67</sup>. Acquisition (particularly vehicle) crime, violence and sexual offences, and anti-social behaviour are the most common crimes across the Borough.

Levels of crime in the Borough are increasing slowly over time, in line with overall increasing crime rates in London<sup>68</sup>. However, Harrow continues to have one of the lowest crime rates in London. As a result of this, Harrow is considered as one of the safest places to live in London. It is believed that the majority of crimes are committed by non-residents, with individuals of the public being drawn to the Borough due to its perceived affluence. Despite these low rates, anecdotal evidence suggests that residents still regard crime as a key issue in the area<sup>69</sup>.

The centre of Harrow holds the highest crime incidence rate within the Borough, with the Town Centre and Greenhill ward being particular areas of issue<sup>70</sup>.

There are several schemes in place across Harrow to tackle crime. Safer Harrow Partnership was developed in 2008, with the aim of making Harrow the safest Borough in London. This scheme is still in place to date, and targets identified aspects of crime in the Borough. In 2014, Harrow police took part in 'Operation Equinox', which aimed to target common venues of offence, including pubs, bars and fast-food outlets. Increased street patrols- especially in winter- were put in place to encourage residents to feel more comfortable in the Borough after dark<sup>71</sup>. Harrow is also running a campaign to deter Violence Against Women and Girls (VAWG) in the Borough. The Autumn Nights Policing Plan was implemented in 2021, which focuses on violence against women and girls, safety in public spaces and street violence. Furthermore, a Borough specific survey has been creating, allowing residents- particularly women and girls- to have their say on where they feel safe/unsafe<sup>72</sup>.

## 6.2 Sustainability Issues

- Harrow is one of the most densely populated Borough's in England;
- The population of the Borough will continue to increase significantly, with a 4.4% increase expected by 2041 (from 2021 levels);

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<sup>67</sup> [Violence against the person \(offences per 1,000 population\) in Harrow | LG Inform \(local.gov.uk\)](#) (Accessed 05/07/23)

<sup>68</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)

<sup>69</sup> Harrow Resident Forum. [Harrow residents discuss crime issues in the borough - Harrow Online](#) (Accessed 18/07/23)

<sup>70</sup> [The most dangerous places to live in Harrow ranked by the latest police stats - MyLondon](#) (05/07/23)

<sup>71</sup> Harrow Borough Plan 2030. [FINAL Borough Plan Key Achievements and Future Intentions Council 240222 .pdf \(harrow.gov.uk\)](#) (Accessed 18/07/23)

<sup>72</sup> [Making Harrow safer for women and girls – London Borough of Harrow](#) (Accessed 29/08/23)



- The Borough has an ageing population, with 19.7% of the Borough's residents predicted to live past 65 by 2031. This is likely to lead to a higher number of residents with increased care and housing needs, and (when combined with the number of children in the Borough) a relatively high proportion of non-working dependents (39.2%);
- The Borough has an increasing number of children and young people, with 19.5% of the Borough's residents expected to be under 15 years by 2031, increasing pressure on schools and health care facilities;
- The Borough population is very diverse with a number of different religions/beliefs present;
- The Borough is generally not deprived although 12.3% of children in Harrow live in families experiencing income deprivation and there are clusters of high deprivation to the North and South of the Borough, as well as within the Centre. The most deprived ward is Wealdstone, found in the centre of the Borough. The least deprived- and therefore the most affluent- ward is Pinner South, found to the West of the Borough. Access to services and good quality housing as well as housing affordability are also contribution to deprivation<sup>73</sup>;
- There is a projected shortfall of primary and secondary school places for pupils in Harrow. There is subsequently a need to expand capacity at existing and new school sites;
- There is a need for further provision of specialist schools and schools supporting pupils with complex learning difficulties;
- Crime rates within Harrow are lower than those elsewhere in London, but fear of crime remains an issue locally; and
- There is a need to encourage safe and well-designed developments with equal accessibility to services and facilities, that cater to the needs of all ages and types of households.

### 6.3 Likely Evolution without the Local Plan

The population of the Borough will continue to increase significantly, and the average age of the population will continue to get older. The proportion of residents aged 65 and over will continue to increase, as residents live longer and birth rates fall. This increase could lead to changes to the types of accommodation required, and how healthcare and leisure facilities are used within the Borough.

General improvement in deprivation levels could be possible which would be consistent with recent trends, but large variations between different parts of the Borough are likely to persist. IMD is derived from seven topic areas including income; employment; health and disability; education, skills and training; barriers to housing services; crime; and living environment deprivation. Multiple agencies are responsible for tackling different forms of deprivation, including healthy lifestyles. This makes prediction difficult.

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<sup>73</sup> 2019 Indices of Deprivation- Harrow Summary [2019 Indices of deprivation \(harrow.gov.uk\)](https://www.harrow.gov.uk/indices-of-deprivation) (Accessed 12/07/23)



Continued improvement in education is likely. A range of organisations are responsible for delivering education and training provision.

There are relatively low crime levels in the Borough. However, fear of crime remains a significant issue within the local community and acquisition crime is still prevalent.

## **6.4 Data Gaps**

There is a need for ongoing monitoring of the number of pupil places within schools, as well as projections for school places. The Local Plan Infrastructure Delivery Plan is currently being prepared and will assess the potential impact of an increase to Student population, and whether there is existing capacity to accommodate the additional demands. Once this information has been obtained, the data in this report will be updated.

In terms of population projections, both the GLA and ONS produce households and population projections, which are used for strategic planning of housing employment, growth and the level of supporting infrastructure required. The Draft Local Housing Need Assessment has considered projections produced by the ONS and GLA, when determining the level of housing that may be required to address future needs of the Borough. This section of the Scoping Report has only included the ONS population projections data, in order to present the population baseline and identify issues.



## 7.0 Health

The following section reviews the baseline data related to health demographics. The following Personal Protected Characteristics are therefore acknowledged in this section: pregnancy and maternity; and disability.

### 7.1 Baseline

#### Life Expectancy and General Health

In 2021, life expectancy for males in the Borough was estimated to be 80.4 years, whilst life expectancy for females in the Borough was estimated to be 84.9 years. These statistics are better than London and England-wide life expectancy, as highlighted in Table 7.1<sup>74</sup>.

Table 7.1: Predicted life expectancies			
	Harrow	London	England
Males (2018-2020)	82.2	80.3	79.4
Females (2018-2020)	85.6	84.3	83.1
Males (2021)	80.4	78.8	78.7
Females (2021)	84.9	83.4	82.7

Source: Public Health England 2023- Local Authority Health Profiles

Life expectancy has decreased slightly in the Borough since 2018. This is not an isolated trend, however, as life expectancy across London and England as a whole has also decreased over time. Life expectancy at birth is a high-level indicator of inequality. Within 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 compared to the least deprived areas.

In 2019, almost 13% of children in Harrow were living in low-income families; this is better than the England average<sup>75</sup>.

The majority of Harrow residents define their health as either ‘very good’ (48.6%) or ‘good’ (35%) according to the 2021 Census. Only 4.5% of residents deemed themselves to be in equal to or less than ‘bad’ health<sup>76</sup>. This may be a consequence of low smoking prevalence in adults (12.4% compared to the London average of 15.4%), and healthy eating (62.5% of residents are meeting their recommended “five a day” compared to an average of 55.8% across London). Under 75 mortality rate- for both cancer and cardiovascular disease- is also better in Harrow than in London and England<sup>77</sup>.

<sup>74</sup> Life Expectancy at Birth. [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://www.phe.org.uk/data/local-authority-health-profiles) (Accessed 05/07/23)

<sup>75</sup> Local Authority Health Profile 2019- Harrow [E09000015 \(phe.org.uk\)](https://www.phe.org.uk/data/local-authority-health-profiles) (Accessed 05/07/23)

<sup>76</sup> Health in Harrow [How life has changed in Harrow: Census 2021 \(ons.gov.uk\)](https://www.ons.gov.uk/census/2021) (Accessed 11/07/23)

<sup>77</sup> Harrow Live Well. [Live Well \(arcgis.com\)](https://www.arcgis.com) (Accessed 19/07/23)





However, the Active Lives Survey (2017/18) estimated that over half of adults and 20% of primary school children in Harrow are overweight or obese. This figure correlates with London's low levels of activity; almost 70% of London residents and 8/10 children in London do not meet the daily minimum of physical activity to stay healthy<sup>78</sup>. Furthermore, 32% of adults in Harrow are classed as physically inactive<sup>79</sup>. As a result, Harrow Council have produced an 'Obesity Plan (2020-2024)' to mitigate these issues.

Increasing activity levels in the Borough is seen as a key mechanism to improving resident health. 'Active Harrow'<sup>80</sup> was utilised as the Borough's physical activity and sports strategy between 2016-2020, with an overarching aim to encourage residents doing no activity, to do some, and residents doing some activity, to do more. Transport for London has also recently created new action plans for walking and cycling, which highlights the city's drive to encourage further physical activity in residents. Policymakers hope by increasing opportunities to walk and cycle, the average level of physical activity individuals conduct will increase. The Mayor's aim is to get every resident conducting an average of 20 minutes of physical activity each day. It is believed that this could save the NHS £1.7 billion over 25 years if achieved, due to a reduction in health issues such as hip fractures, dementia, depression and cardiovascular disease<sup>81</sup>.

The Borough also has a high prevalence of diabetes, with 10.1% of residents suffering from the condition, compared to 6.7% across London, and 7.1% across England.

Key links have been found between obesity and oral health. The rate of tooth decay in young children is high, with 39.6% of five-year-olds in the Borough having one or more decayed/missing teeth. This is higher than both the London and England average (25.7% and 23.3% respectively)<sup>82</sup>.

### **Disability**

In 2021, 5.9% of residents identified themselves as 'disabled and limited a lot', and 7.3% identified themselves as 'disabled and limited a little'. Both of these figures have decreased since 2011. These figures are lower than the London (15.6% of residents identify themselves as disabled to some extent) and national averages (17.7% of residents identify themselves as disabled to some extent)<sup>83</sup>.

In 2017, 2.6% of Harrow's population received Disability Living Allowance. During the same year, 575 residents were receiving long-term social care support for learning disabilities<sup>84</sup>. 52% of those classed as disabled in London do not have access to a car, and thus rely on public transport links<sup>85</sup>.

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<sup>78</sup> Healthy Streets for London. [Healthy Streets for London \(tfl.gov.uk\)](https://tfl.gov.uk) (Accessed 12/07/23)

<sup>79</sup> Harrow Obesity Plan 2020-2024. [Harrow Obesity Plan 2020-24](#) (Accessed 11/07/23)

<sup>80</sup> Active Harrow [physical-activity-and-sports-strategy-2016-to-2020 \(harrow.gov.uk\)](#) (Accessed 20/07/23)

<sup>81</sup> London's Cycling Action Plan (2) [Cycling action plan 2 \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>82</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)

<sup>83</sup> Disability in Harrow [How life has changed in Harrow: Census 2021 \(ons.gov.uk\)](#) (Accessed 11/07/23)

<sup>84</sup> Our Harrow, Our Community- Equality Profile 2017/18 [annual-equalities-data-2017-18.pdf \(harrow.gov.uk\)](#) (Accessed 17/07/23)

<sup>85</sup> Harrow Local Implementation Plan [lip-letter-harrow.pdf \(tfl.gov.uk\)](#) (Accessed 12/7/23)



As the number of residents over 65 years of age increases in Harrow, there is likely to be a rise in the number of people living with long term conditions and disabilities. As a result, there is likely to be an increased need for social care services as older people become the main Adult Social Care service users<sup>86</sup>. There is also a need to provide housing (new and existing) that are built to regulation accessible and adaptable standards, so that the elderly can live comfortably and independently for longer.

Harrow has the highest employment rate for disabled residents (62.4%) of all the West London Boroughs and is substantially above the London and national average rates. This employment rate has risen substantially since 2012, with an increase of 57.9%<sup>87</sup>. This potentially suggests that physical barriers for those with health inequalities may be reducing.

Young residents of Harrow with a disability were found to feel less safe in school/college/work, as well as when travelling, than those without a disability<sup>88</sup>.

### **Pregnancy and Maternity**

In 2016, there were 14.5 live births per 1000 population in Harrow. This was higher than the UK average of 11.8 live births per 1000 population<sup>89</sup>. Over the next 10 years birth rates are expecting to increase by a further 4%. In 2018, Harrow had the lowest levels of births (19.4%) outside of marriage in England<sup>90</sup>. The conception rate for under 18's in Harrow is 8.7 per 1000<sup>91</sup>.

Over time, infant, neonatal and perinatal mortality rates have decreased, and infant mortality rates are now considered average, at 3.8 deaths per 1000<sup>92</sup>. However, the key risk factors still need to be addressed such as reducing the number of children in poverty, as well as homelessness in families with children and pregnant women, and increasing vaccination rates by 1 year of age<sup>93</sup>. The implications of this for the Local Plan are addressing housing need and supporting a healthy economy in Harrow.

### **Air Quality**

In 2019, it is believed that poor air quality, particularly from PM<sub>2.5</sub> and NO<sub>2</sub> contributed to between 3600 and 4100 premature deaths in London. Modelling estimates suggest that this may have included up to 118 deaths in Harrow in 2019. The modelling study conducted by Imperial College London (2021) also found that the greatest pollution related health impacts were being felt in Outer London Boroughs, despite these areas having lower overall pollution levels than Inner London. This is thought to be a result of Outer London having higher proportions of

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<sup>86</sup> Harrow's Age Well. [Age Well \(arcgis.com\)](#) (Accessed 27/07/23)

<sup>87</sup> Harrow Local Economic Assessment 2019-2020. [labour-market.pdf \(harrow.gov.uk\)](#) (Accessed 05/07/23)

<sup>88</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)

<sup>89</sup> Births by mother's usual area of residence in the UK. [Births by mothers' usual area of residence in the UK - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 11/07/23)

<sup>90</sup> [annual-equalities-data-2017-18.pdf \(harrow.gov.uk\)](#)

<sup>91</sup> Local Authority Health Profiles- Child Health. [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](#) (Accessed 11/07/23)

<sup>92</sup> Infant Mortality Rates [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](#) (Accessed 11/07/23)

<sup>93</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)



vulnerable people, such as the elderly and families with children<sup>94</sup>; pregnant women and young children are more likely to suffer from the impacts of air pollution<sup>95</sup>.

There are four areas deemed as Air Quality Focus Areas (AQFAs) within Harrow. These are areas that exceed the EU annual mean limit for nitrogen dioxide (NO<sub>2</sub>) and have high human exposure. These AQFs have also been identified to highlight areas that may never have their air pollution issues fully resolved, despite national, regional, and local air quality measures. It is therefore likely that residents living within these areas will have a disproportionate exposure to air pollution, and thus the associated health impacts<sup>96</sup>.

Further information on air quality within the Borough is provided in Chapter 10.

### **Mental Health**

In 2021, the number of residents suffering from Common Mental Disorders was estimated to be 30,000 (15.6%), with the majority of sufferers being under 65 years of age. This is lower than estimations for London and England (19.3% and 16.6% respectively)<sup>97</sup>. Additionally, 20% of 10–19-year-olds in the Borough say they need mental health support or know someone who does<sup>98</sup>.

10.7% of residents aged over 65 are living alone. This is likely to impact mental health in older people due to the effects of loneliness.

### **Dementia**

An estimated 0.7% of Harrows population are living with dementia<sup>99</sup>. There appears to be a gender disparity in relation to the spread of the disease, with 8.2% of females over the age of 65 having dementia, compared to 6.1% of males. The ageing population in Harrow will likely increase the burden of age-related conditions such as dementia<sup>100</sup>.

### **Open Spaces and Activity**

It is recognised that access to sports and recreational facilities, proximity to and use of green space all contribute to the positive mental wellbeing of people living and working in the Borough<sup>101</sup>. Harrow contains a number of parks, gardens and nature reserves which are managed by the Borough Council. These include<sup>102</sup>:

- Open Spaces: Bentley Priory; Churchfields; The Grove; Grimsdyke; Lake Grove; Weald Village; Whitefriars; Woodlands; Yeading Brook;

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<sup>94</sup> London Health Burden- Air Pollution

[london\\_health\\_burden\\_of\\_current\\_air\\_pollution\\_and\\_future\\_health\\_benefits\\_of\\_mayoral\\_air\\_quality\\_policies\\_january2020.pdf](#) (Accessed 17/07/23)

<sup>95</sup> Children and Air Pollution [Children and air pollution \(who.int\)](#) (Accessed 20/07/23)

<sup>96</sup> The London Plan 2021. [the\\_london\\_plan\\_2021.pdf](#) (Accessed 27/07/23)

<sup>97</sup> Harrow Live Well [Live Well \(arcgis.com\)](#) (Accessed 20/07/23)

<sup>98</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)

<sup>99</sup> Dementia Prevalence [Public health profiles - OHID \(phe.org.uk\)](#) (Accessed 30/08/23)

<sup>100</sup> Harrow Public Health Briefing on Dementia [public-health-dementia-briefing-2019-20 \(harrow.gov.uk\)](#) (accessed 27/07/23)

<sup>101</sup> Harrow Annual Health Report 2021 [Harrow annual public health report 2021](#) (Accessed 20/07/23)

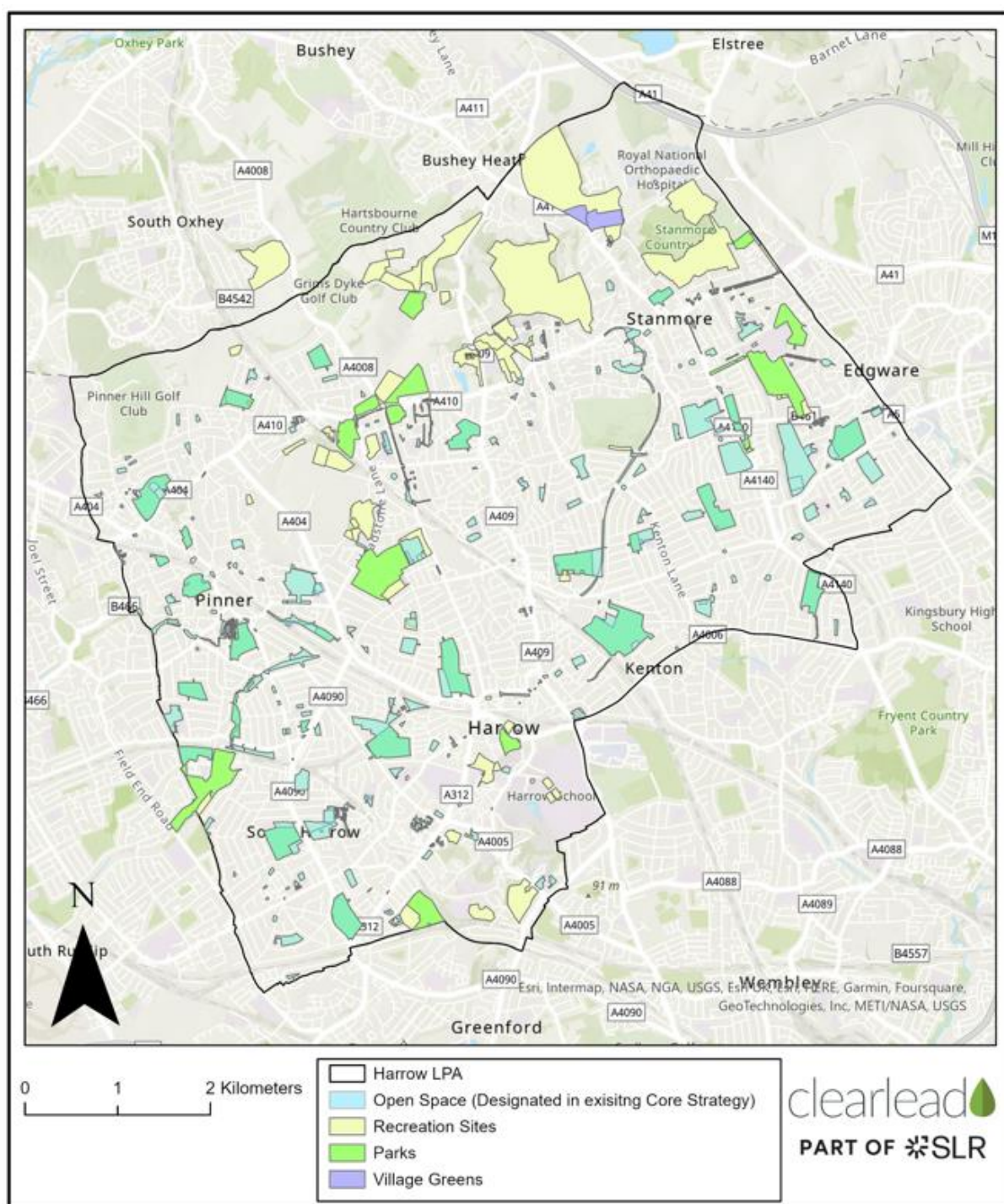
<sup>102</sup> Harrow's green spaces. [Harrow's green spaces – London Borough of Harrow](#) (Accessed 11/07/23)



- Bernays Gardens;
- Playing Fields: Hatch End; The Coft;
- Recreational Grounds: Harrow; Pinner; Priestmead; Roxeth; Kenton;
- Pinner Memorial Park;
- Canons Park;
- Little Common Pinner;
- Newton Farm Ecology Park;
- Stanmore Country Park;
- Stanmore Common; and
- The Viewpoint.

Figure 7.1 shows a fairly even dispersal of open spaces within the Borough, including those designated as recreational sites, parks and village greens.





**Figure 7.1: Designated Open Spaces, parks, recreational sites, and village greens**

GIS analysis highlights that there are 24 tennis courts, 35 outdoor pitches, 25 indoor sports centres and 11 bowling greens in Harrow. For all of these types of active recreational sites, there appears to be deficiency to the North of the Borough, where a high level of deprivation exists. This therefore suggests that access to recreation sites is limited in areas of deprivation.



There are a number of identified Areas of Deficiency (AoD) however. These are Open Spaces with a lack of accessibility, being located more than one kilometre walking distance from an accessible Metropolitan or Borough Site. It is estimated that Areas of Deficiency in Harrow stretch across 1,323.11 ha (26.3% of the total area) and are confined to the central and Southern section of the Borough, stretching from East to West<sup>103</sup>.

## 7.2 Sustainability Issues

- 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;
- Obesity is a significant issue within the Borough. 32% of adults in Harrow are classed as physically inactive<sup>104</sup>, and 8/10 children in London do not meet the daily minimum of physical activity to stay healthy<sup>105</sup>;
- The Borough has a high prevalence of diabetes, with 10.1% of residents suffering from the condition, compared to 6.7% across London, and 7.1% across England Key links have been found between obesity and oral health;
- The rate of tooth decay in young children is high, with 39.6% of five-year-olds in the Borough having one or more decayed/missing teeth;
- 52% of those classed as disabled in London do not have access to a car, and thus rely on public transport links<sup>106</sup> (see section 9.2 transport sustainability issues which identifies a related issue regarding the accessibility of public transport);
- The number of disabled residents, and those requiring Adult Social Care, is likely to increase with the ageing population (see section 8.2 housing sustainability issues which identifies a related issue regarding the design of housing);
- The number of older residents suffering with dementia and loneliness is likely to increase with the ageing population;
- Young residents of Harrow with a disability were found to feel less safe in school/college/work, as well as when travelling, than those without a disability<sup>107</sup>;
- In 2016, there were 14.5 live births per 1000 population in Harrow. This was higher than the UK average of 11.8 live births per 1000 population<sup>108</sup>. Over the next 10 years birth rates are expecting to increase by a further 4%;

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<sup>103</sup> Harrow Local Plan Authority's Monitoring Report (2017-2019). [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](#) (Accessed 27/07/23)

<sup>104</sup> Harrow Obesity Plan 2020-2024. [Harrow Obesity Plan 2020-24](#) (Accessed 11/07/23)

<sup>105</sup> Healthy Streets for London. [Healthy Streets for London \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>106</sup> Harrow Local Implementation Plan [lip-letter-harrow.pdf \(tfl.gov.uk\)](#) (Accessed 12/7/23)

<sup>107</sup> Harrow Start Well [Start Well \(arcgis.com\)](#) (Accessed 19/07/23)

<sup>108</sup> Births by mother's usual area of residence in the UK. [Births by mothers' usual area of residence in the UK - Office for National Statistics \(ons.gov.uk\)](#) (Accessed 11/07/23)



- In 2019, it is believed that poor air quality, particularly from PM<sub>2.5</sub> and NO<sub>2</sub> contributed to between 3600 and 4100 premature deaths in London. Modelling estimates suggest that this may have included up to 118 deaths in Harrow (around 6%;
- Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues;
- Access to recreation sites is limited in areas of deprivation, such as the North of the Borough.
- More than ¼ 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; and
- There is a need to encourage more walking and cycling to encourage further physical activity in residents.

### 7.3 Likely Evolution 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.

Transport for London is promoting more walking and cycling in London. Further policy intervention would 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.

Air quality may worsen with growth in the Borough. Worsening air quality would exacerbate existing health issues, as well as increase the number of individuals suffering with conditions such as asthma<sup>109</sup>.

### 7.4 Data Gaps

Disability data (how residents identify themselves) is age standardised; it is therefore difficult to understand whether disabilities are equally spread across the Borough's population.

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.

A Recreation Study is currently being carried out in the Borough. Relevant data will be updated once the next annual report is released.

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<sup>109</sup> Cycling Action Plan (2) [Cycling action plan 2 \(tfl.gov.uk\)](https://www.tfl.gov.uk) (Accessed 20/07/23)



## 8.0 Housing

### 8.1 Baseline

In 2021, there were 89,624 households in Harrow. There has been an increase of 6.3% in the number of households present in the Borough since 2011. Across this timescale, the number of three person households saw the largest increase of 15.2%, followed by the number of five person households with an increase of 9.1%. This is likely due to an increasing number of families in the Borough; 58% of the increase to households is accounted for by households with dependent and non-dependent children.

As shown in Figure 8.1, since 2011 there has been a reduction of 10% in the number of households being owned through a mortgage, loan or shared ownership and a large increase in the number of households being privately rented (36%). The number of households owned outright have increased by just 3% since 2011.

Table 8.1: Tenure of Households in Harrow			
Tenure	2011	2021	% Change 2011-2021
Owned (outright)	26,246	26,947	3
Owned (mortgage, loan or shared ownership)	29,576	26,750	-10
Rented (social rented)	8,923	9,298	4
Private rented/lives rent free	19,523	26,647	36

Source: ONS 2021- Tenure of Households

Between 2011 and 2021 there was little change to the housing stock in Harrow, with just a 3% increase in the number of dwellings. The number of detached, semi-detached and terraced households has decreased over this period, however the stock of flats has increased by 17%<sup>110</sup>. Despite these changes, semi-detached housing remains the most common household type within Harrow. Table 8.2 highlights how housing is comprised in Harrow<sup>111</sup>.

Table 8.2: Types of Dwelling Present in Harrow		
Type of Dwelling	Number	Percentage (%)
Detached	10,174	11%
Semi-detached	33,281	37%
Terraced	15,136	17%

<sup>110</sup> Harrow [Census change over time data, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/census/change-over-time/data/england-and-wales) (Accessed 27/07/23)

<sup>111</sup> [Accommodation type - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/accommodation/type) (Accessed 05/07/23)





Table 8.2: Types of Dwelling Present in Harrow		
Flats	23,528	26%
Other	7,523	8%

**Source: ONS 2021- Accommodation Type**

The London Plan (2021) indicates that there is a need to deliver a total of 66,000 homes per annum (2016-41) across Greater London, in order to meet growing housing demand. However, the 2017 London SHLAA suggests that there is only capacity for 52,000 homes per year (12,000 of those being on small sites), highlighting a shortfall in capacity to address the future housing needs of London. Since 2016, an average of 36,000 homes have been built per annum across London. This includes affordable and council housing, with over 18,000 affordable homes being developed in 2022 alone<sup>112</sup>. As of March 2022, 186 new council homes were under development in Harrow<sup>113</sup>.

The Harrow Core Strategy (2012) established a minimum housing target of 6,050 net additional homes to be provided in Harrow from 2009-2026. This was achieved with 8410 additional homes being delivered in total. 17.3% of the homes developed during this period being affordable housing. However, this fell below the target of 40% of all homes developed during this period being affordable housing. 15.6% of the additional homes delivered were 3 bed or larger, in order to provide for family housing demand. This figure also fell below the Local Plan target of 25% being family specific. The key reason for this was that a significant proportion of total dwellings completed during this period (82%) were one/two bed or studio flats, mainly located within the Harrow and Wealdstone Opportunity area. Furthermore, a number of homes (11%) were delivered via the prior approval route, meaning the Council had no control in relation the size of these units<sup>114</sup>.

Minimum housing targets for Harrow have since been updated; according to the London Plan (2021), in order to meet the minimum local housing requirement for Harrow, the Borough Council will need to deliver 8,020<sup>115</sup> dwellings over the next 10 years (2019-2029), based on capacity. 3,750 of these are anticipated to be delivered on small sites (below 0.25 hectares in size)<sup>116</sup>. The 2022 Harrow Local Housing Needs Assessment doubled the London Plan’s 10 year housing target, to create a 20 year housing target of 16,040 dwellings (for the period 2021-2041). However, an alternative approach within the same Local Housing Needs Assessment suggested a housing need figure greater than this. The Council is undertaking further evidence to assess the housing capacity to address the future housing needs.

The Harrow Draft Local Housing Needs Assessment also suggested that a significant proportion (i.e. in excess of 50%) of all additional homes delivered should

<sup>112</sup> Cycle Action Plan. [Cycling action plan 2 \(tfl.gov.uk\)](https://tfl.gov.uk/cycling-action-plan-2) (Accessed 12/07/23)

<sup>113</sup> Housebuilding in Harrow. [Housebuilding in Harrow \(2\) | London City Hall](https://www.london.gov.uk/what-we-do/what-services/housing/housing-policy/housebuilding-in-harrow) (Accessed 11/07/23)

<sup>114</sup> Annual Monitoring Report [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](https://www.harrow.gov.uk/authority-s-monitoring-report-amr-2017-18-2018-19) (Accessed 30/08/23)

<sup>115</sup> NB the London Plan (2016) 10 year housing delivery target was 5927 (593 homes per annum) between 2015-2025)

<sup>116</sup> The London Plan 2021. [the london plan 2021.pdf](https://www.london.gov.uk/what-we-do/what-services/housing/housing-policy/the-london-plan-2021) (Accessed 14/07/23)



consist of family housing (3 bed dwellings or larger) in order to provide for a significant increase in the number of families with children and larger sized families (such as multi generation households) that are expected to occur between 2021-41, as well as to address the existing imbalance between the excess demand for family sized housing (rise in larger sized families, families with children) compared to the supply (.i.e. lack of additional larger dwellings)<sup>117</sup>.

In 2012, Harrow and Wealdstone Opportunity Area was designated as a key area for housing growth, with provision being made for 2,800 net new homes<sup>118</sup>. This target has now been updated as a result of the London Plan (2021) which highlights the area as holding an indicative capacity of 5000 homes, along the Highspeed 2/Thameslink Growth Corridor<sup>119</sup>.

The London Plan (2021) seeks to direct the higher levels of housing growth to the most accessible and sustainable locations of the Borough:

- Policy SD1 (Opportunity Areas) indicates that the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre) is expected to experience major change and accommodate a significant level of the housing. After this, it prioritises housing growth at Edgware Major Centre, followed by the District and local centres across the Borough.
- The supporting text of Policy H2 (Small Sites) of the London Plan indicates "For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority." It also indicates that the incremental intensification of existing residential areas within the most accessible locations (PTAL 3-6, 800m of a tube station, railway station and town centres such as Metropolitan centres, Major Centres and District Centres) of the Borough will play an increasingly important role towards meeting the small sites (below 0.25ha) target of 375 homes per annum.

Housing affordability has become a significant concern in recent years. Since 2018, average house prices for all property types within the Borough have risen by almost £50,000<sup>120</sup>. The biggest price change has occurred for detached homes, with the average selling price in the Borough increasing by more than £205,000 in the last five years. Similarly, ONS data indicates that lower quartile house prices increased from £230,000 to £427,500 (86%) for a 2 bed dwelling between 2011 and 2021. In Harrow, the annual lower quartile work placed earnings increased from £17,888 - £23,635 (32%). Due to this, the lower quartile house prices to annual earnings ratio- which is an important indicator for housing affordability- increased from 12.79 to 18.09 (41%) in the Borough. This means the affordability of housing in Harrow has

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<sup>117</sup> Harrow Draft Local Housing Need Assessment (2022) (Accessed 27/07/23)

<sup>118</sup> Harrow and Wealdstone Area Action Plan [harrow-wealdstone-area-action-plan.pdf](#) (Accessed 02/08/23)

<sup>119</sup> The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 02/08/23)

<sup>120</sup> [UK House Price Index \(data.gov.uk\)](#) (Accessed 05/07/23)



worsened over time; lower income groups could now expect to spend 18 times their work based annual earnings on purchasing a home<sup>121</sup>.

Table 8.3 highlights the average annual income required for different housing products in Harrow. As highlighted within the table, a significantly lower income is required to reside within social rented housing and London living rented accommodation, compared to intermediate products like London Shared ownership and First homes.

Table 8.3: Annual Income Required for Different Affordable Housing Tenures w				
Number of Bedrooms	London Social Rent	London Living Rent	London Shared Ownership	First Homes
1 bedroom	Less than £32,000	£32,000-£46,000	£46,000-£90,000	£35,000-£90,000
2 bedrooms	Less than £36,000	£36,000-£68,000	£68,000-£90,000	£53,000-£90,000
3 bedrooms	Less than £38,000	£38,000-£80,000	£80,000-£90,000	£85,000-£90,000
4+ bedrooms	Less than £44,000	£44,000-£80,000	£80,000-£90,000	£86,000-£90,000

Source: Draft Harrow Local Housing Needs Assessment (GLA and ORS Housing Model)

Issues of affordability are further exacerbated by a lack of affordable housing development in the Borough. In total, Harrow has delivered 1,454 (net) affordable homes, which is equal to 17.3% of the total new homes (8,410) delivered between 2009/10 – 2020/21. This is below the Core Strategy (2013) target of 40% of all new homes being affordable (equivalent to the delivery of 2,420 homes during the Plan period (2009-26)). The key reason for this under delivery is viability issues related to the delivery of affordable housing; a number of new homes (1,130) were delivered by permitted development rights (e.g. office to residential) which did not require the delivery of affordable housing. Some level of assistance is provided through the 'Help to Buy' scheme, however.

Affordability issues can be considered a spatial issue across the Borough. Housing deprivation is particularly high in the north of Harrow, specifically in Stanmore Park. As this sub-domain measures the physical and financial accessibility of housing and services, this suggests that housing deprivation in Harrow is a result of poor access to services and good quality housing, as well as issues of affordability<sup>122</sup>. These findings are further supported by the high concentration of social housing in the most deprived neighbourhoods<sup>123</sup>.

<sup>121</sup> [UK House Price Index - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 11/09/23)

<sup>122</sup> 2019 Indices of Deprivation- Harrow Summary [2019 Indices of deprivation \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 12/07/23)

<sup>123</sup> Harrow Vitality Profiles 2018-2019- Deprivation [deprivation.pdf \(harrow.gov.uk\)](https://harrow.gov.uk) (Accessed 05/09/23)



The Harrow Draft Local Housing Needs Assessment indicates that 50% of all additional homes delivered should be affordable. This translates to a minimum of 4,010 affordable houses being built each year within the Borough. This figure considered the number of homeless, overcrowded and temporary households in the Borough. The assessment also suggests that a significant proportion of housing delivered should be low-cost rented housing (London Social Rent and London Living Rent)<sup>124</sup>.

Harrow has an ageing population, with 19.8% of the Borough's predicted population in 2030 being aged 65 and over. This may increase the need to provide additional accommodation that is suitable for the needs of older people with different requirements. , Policy H13 of the London Plan, which sets an indicative benchmark target of 165 specialist older persons homes annually (2017-2029)<sup>125</sup>. Developing to the Building Regulations (2010) Standards (Part M)- specifically relating to accessible and adaptable dwellings, as well as wheelchairs user access- would help to support these residents further and enable them to live independently for longer.

## 8.2 Sustainability Issues

The following sustainability issues have been identified:

- The housing delivery target for the Borough is expected to increase from 6050 (2009-26) to 8020 (2019-29);
- Housing affordability is a key issue, meaning there is a need to increase the supply of affordable housing (particularly social rented housing);
- The population of the Borough is aging which is likely to lead to a higher number of residents living with increased care needs;
- A significant proportion of all additional homes to be delivered should consist of family housing (3 bed dwellings or larger) in order to provide for a significant increase in the number of families with children and larger sized families (such as multi generation households) that are expected to occur between 2021-41, as well as to address the existing imbalance between the excess demand for family sized housing (rise in larger sized families, families with children) compared to the supply (.i.e. lack of additional larger dwellings);
- Housing development must take into account the needs of those with accessibility issues (including those with disabilities and older people) by building with accessibility in mind, to The Building Regulations (2010) standards (Part M), as well as increasing the provision of accommodation that is suitable for the needs of older people with different requirements There is a need for a mix of housing types, sizes and tenures to be provided to meet the requirements of different groups in the community (e.g.: affordable housing, suitable accommodation for the needs of an aging population; larger family homes etc); and

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<sup>124</sup> Harrow Draft Local Housing Need Assessment (2022) (Accessed 27/07/23)

<sup>125</sup> The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 14/07/23)



- There is need to supply a range of different sized housing sites, as larger sites have a longer lead in time and built out rate, to maintain a stable supply and five-year land supply of deliverable sites; and
- The London Plan seeks to direct higher levels of housing growth to the most accessible and sustainable locations of the Borough which it has identified as the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre), followed by Edgware Major Centre, and the District and local centres across the Borough. It also suggests the intensification of existing residential areas within the most accessible locations (PTAL 3-6, 800m of a tube station, railway station and town centres such as Metropolitan centres, Major Centres and District Centres) of the Borough will play an increasingly important role towards meeting the small sites (below 0.25ha) target of 375 homes per annum.

### **8.3 Likely Evolution 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.

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.

Housing affordability is largely determined by house prices (themselves largely based on economic cycles and housing supply), and the ability of households to buy property (household income, availability of credit). Given the difficulty in forecasting economic trends and recent uncertainty surrounding inflation, it is difficult to predict whether housing affordability will change in the near term and which direction such change could take. Increased housing provision in the long-term could address the persistent under delivery of homes which supports higher house prices and could therefore help improve the affordability of housing.

### **8.4 Data Gaps**

A finalised Local Housing Need Assessment Report is to be made publicly available and highlight the chosen housing target in Harrow for the period 2021-2041. 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.



## 9.0 Transport and Accessibility

### 9.1 Baseline

There are a number of key roads passing through, and surrounding, Harrow. To the North, the Borough is surrounded by the M25, A1 and A41, and to the South the Borough is surrounded by the A40, A406, M40 and M4.

There are approximately 1,615 roads in the Borough, stretching over 457 km in length<sup>126</sup>. In 2021, 380 million vehicle miles were travelled on roads in Harrow<sup>127</sup>. None of the roads within Harrow are part of the Transport for London Road Network, meaning the Borough is responsible for its own maintenance and management. There is known to be a significant backlog in the structural maintenance of roads within Harrow, valued at £100 million. Harrow Council aims to eliminate all road deaths and serious injuries by 2041. In 2019, there were 56 individuals killed or seriously injured as a result of traffic collision<sup>128</sup>.

Public transport in Harrow is diverse, with a number of options for travel. Within the Borough, there are 10 Tube stations, 3 Overground stations and around 430 bus stops<sup>129</sup>. Four London Underground lines are accessible in Harrow, including the Metropolitan, Bakerloo, Jubilee and Piccadilly lines. There is currently adequate capacity on Underground services in Harrow, however Harrow bus station is operating over capacity<sup>130</sup>. TFL have subsequently indicated an intention to redevelop the bus station site, in order to address capacity issues.

Public Transport Access Levels (PTAL) are varied however, as seen in Figure 9.1. Despite having a large number of tube stations and bus stops, a significant proportion of the Borough-particularly to the North- is shown to have poor access to public transport. Harrow Metropolitan Centre, is shown to have the best PTAL in the Borough, followed by Pinner, Burnt Oak, Rayners Lane and Stanmore District Centres<sup>131</sup>.

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<sup>126</sup> Harrow Highway Repairs and Maintenance [Harrow's highways – Highway repairs and maintenance – London Borough of Harrow](#) (Accessed 12/07/23)

<sup>127</sup> Harrow Traffic Statistics. [Road traffic statistics - Local authority: Harrow \(dft.gov.uk\)](#) (Accessed 12/07/23)

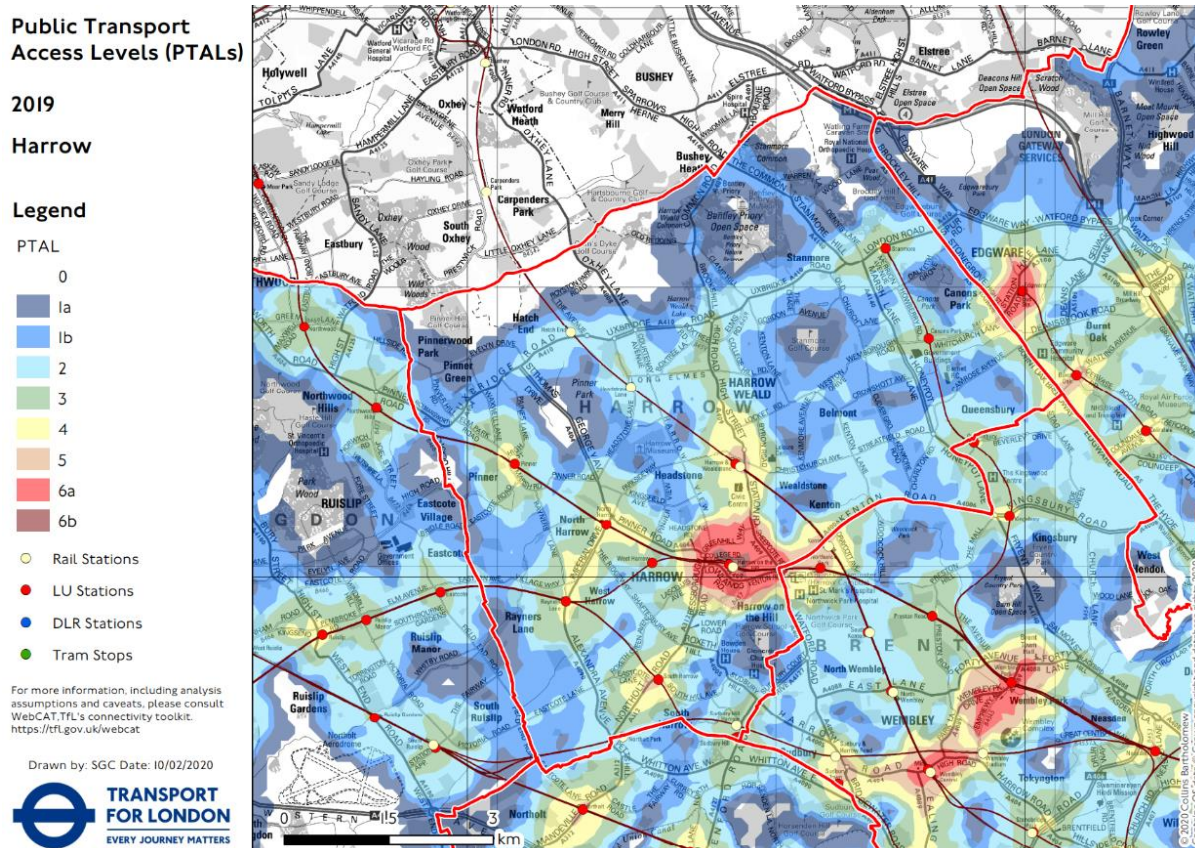
<sup>128</sup> Harrow TFL [Harrow - Transport for London \(tfl.gov.uk\)](#) (Accessed 20/07/23)

<sup>129</sup> Harrow TFL [Harrow - Transport for London \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>130</sup> Harrow Transport Local Implementation Plan (2019-2021) [harrow-transport-local-implementation-plan.pdf](#) (Accessed 27/07/23)

<sup>131</sup> Harrow PTAL [Public Transport Access Levels - Harrow \(tfl.gov.uk\)](#) (Accessed 20/07/23)





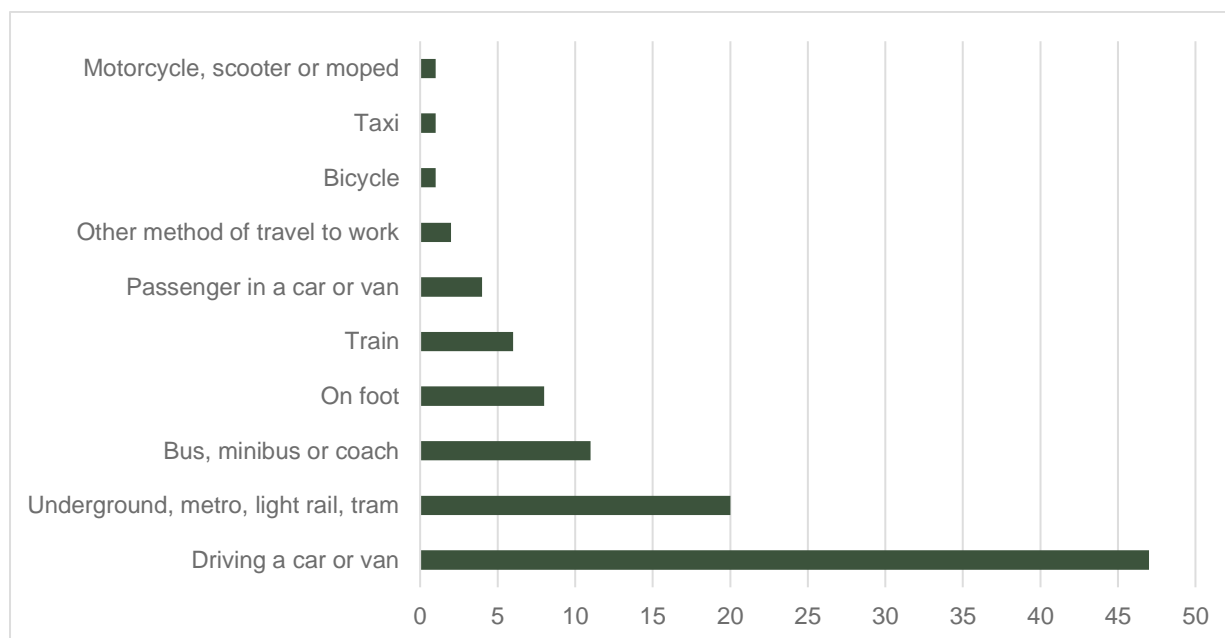
**Figure 9.1: Public Transport Access Levels in Harrow (Source: Transport for London- Public Transport Access Levels)**

In Harrow, driving a car or van is the most common method of travel to work, accounting for almost half of all commutes. This is unsurprising as 75.2% of households in the Borough own at least one car<sup>132</sup>. Public transport use via the tube, train or bus accounts for 31% of all commutes, followed by 8% on foot. Just 1% of commutes in Harrow are undertaken by bike<sup>133</sup>. This is highlighted in Figure 9.2.

<sup>132</sup> Harrow [Car or van availability - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 27/07/23)

<sup>133</sup> Method use to travel to work. [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (Accessed 12/07/23)





**Figure 9.2: Methods of Travel to Work in Harrow (Source: ONS 2021- Methods Used to Travel to Work)**

Although there are high levels of vehicle use across Harrow, residents are rapidly transitioning to plug-in vehicles as an alternative to petrol/diesel power. Between 2017 and 2022, there has been an 11.7% increase in the number of plug-in vehicles registered in Harrow. Similarly, across London there has been a 13.2% increase in the number of plug-in vehicles registered in the same timeframe<sup>134</sup>. There is also a growing number of electric vehicle charging points being implemented across the Borough, in order to accommodate this change. Although a large number of chargers are clustered towards the centre of Harrow, chargers are available across the Borough<sup>135</sup>. As shown in Table 9.1, Harrow is lagging behind neighbouring Borough's in regards to the installation of EV charging points. As a result, Harrow is just one of two London Borough's (the other being Bexley) to fall into the bottom 20% of local authorities in regards to EV charging point prevalence<sup>136</sup>.

**Table 9.1: Number of EV charging points per 100,00 people<sup>137</sup>**

Borough	Number of EV Charging Points per 100,000 people
Harrow	23.4
Brent	240.2
Barnet	89.8

<sup>134</sup> Licensed ULEZ at the end of the quarter [Vehicle licensing statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/vehicle-licensing-statistics-data-tables) (Accessed 29/08/23)

<sup>135</sup> Electric vehicle charging points [Electric vehicle charging points – London Borough of Harrow](#) (Accessed 20/07/23)

<sup>136</sup> Electric Vehicle charging device by local authority [Markdown map LocalAuthority publication template.knit \(dft.gov.uk\)](#) (Accessed 29/08/23)

<sup>137</sup> Electric Vehicle charging device by local authority [Markdown map LocalAuthority publication template.knit \(dft.gov.uk\)](#) (Accessed 29/08/23)





Borough	Number of EV Charging Points per 100,000 people
Ealing	113.1
Hillingdon	63.0

Source: Department for Transport- Electric vehicle charging devices by local authority

The Mayor’s Transport Plan (2018) sets out a target that by 2041, 80% of journeys in London will be achieved by sustainable modes of transport, including walking, cycling and public transport in order to reduce dependency on cars. Approximately six million bus journeys are made each day in London, representing around one in five journeys made within the city. This is unsurprising when it is considered that 96% of Londoners live within 400 metres of a bus stop. As part of the Transport Plan, a new ‘Superloop’ bus network is being created. As part of this network, a new route is proposed (X183) linking Harrow to North Finchley, adding to the existing 39 routes across the Borough<sup>138</sup>.

Buses are crucial methods of transport for low-income households, and those with health issues. Affordability is another pull towards bus usage, with free travel being offered to children under 18, the elderly, and those with disabilities. Discounted travel is also offered for students, apprentices, and jobseekers. It is estimated that a third of bus users in London are residents with annual household incomes of less than £20,000<sup>139</sup>. However, despite affordability being one of the biggest pulls to the use of public transport, deprived areas do not always have the best access. For example, some areas of Wealdstone- deemed the most deprived area of Harrow Borough- have PTAL ratings of 1b and lower, suggesting that poor access to public transport may be more prevalent in areas of deprivation.

The London Plan (2021) indicates that there is a potential growth corridor in Harrow and Wealdstone related to transport developments such as Highspeed 2 (HS2) and improvements to the Thameslink, if a new station were to be opened in Old Oak Common. The West London Orbital - a proposed strategy to open a rail freight link to passenger services - is also likely to increase connectivity for Harrow residents<sup>140</sup>.

Transport for London have dedicated £8.1 billion over three and a half years (2023-2027) to support the Mayor’s Transport Plan, as well as tackle the climate emergency<sup>141</sup>. This plan utilises a ‘Healthy Streets Approach’, with policies and strategies being developed to help Londoners reduce their car usage and increase use of public transport and walking/cycling networks. It is estimated that the current volume of cars in London must be reduced by at least 27% by 2030 to meet climate targets. Reducing the number of cars on the road will also be economically

<sup>138</sup> London Superloop Bus Network. [TfL releases new detailed maps of the Superloop - Transport for London](#) (Accessed 12/07/23)

<sup>139</sup> Harrow Local implementation Plan. [lip-letter-harrow.pdf \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>140</sup> Harrow Local Plan Authority’s Monitoring Report (2017-2019) [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](#) (Accessed 27/07/23)

<sup>141</sup> [TfL publishes new draft Business Plan to support London’s recovery from the pandemic - Transport for London](#) (Accessed 29/08/23)



beneficial; it is predicted that traffic congestion costs London's economy £5.1 billion<sup>142</sup>.

A new London wide Cycling Action Plan 2 has been created in conjunction with the Mayor's Transport Plan, which includes targets of reaching 1.6 million daily cycle journeys by 2030 (a 33% increase from the 1.2 million journeys made in 2022), as well as achieving ensuring 40% of Londoners are living within 400 metres of a cycle network by 2030 (an 18% increase from 2022)<sup>143</sup>. Between 2005-2008, 3,500 cycle trips were carried out in Harrow. 126,900 potential cycle trips were calculated, however, suggesting only 3% of cycling potential had been realised<sup>144</sup>. This is likely to be a result of a number of identified barriers, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft<sup>145</sup>. In 2019, there were a total of 41km cycle lanes in Harrow<sup>146</sup>.

A new Walking Action Plan has also been produced, in an attempt to make London the most walkable city. This plan targets outer London with a focus on reducing the dominance of motorised transport. As well as being affordable methods of transport, policymakers hope that improving cycling and walking networks will improve overall resident health, as individuals are encouraged to partake in more exercise. This action plan should help decrease the current low levels of walking in the Borough.

Harrow's Annual Monitoring Report (2019) highlighted that public transport accessibility for those with disabilities was an issue across the Borough, due to a lack of step-free access at tube stations<sup>147</sup>. As part of the Mayor's Transport Plan, overall accessibility of London's transport system is also looking to be improved, with aims of halving the average additional time taken to make a journey on the step-free network, compared to the full network<sup>148</sup>. Harrow-on-the-Hill and Sudbury Hill stations have recently undergone work to improve step-free access.

There is increasing pressure to park on public highways within Harrow. As a result, Controlled Parking Zones (CPZ) have been implemented and now cover around 37% of roads in the Borough. CPZ' improve safety and access and assist parking management in town centres. They also support residential amenity through the introduction of 'residential permit restricted' developments<sup>149</sup>. The Harrow Parking Management Programme (2022-2023) highlighted a number of areas within the Borough showing support for the introduction of new CPZ's and residential parking schemes<sup>150</sup>.

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<sup>142</sup> London Cycling Action Plan (2) [Cycling action plan 2 \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>143</sup> London Cycling Action Plan (2). [Cycling action plan 2 \(tfl.gov.uk\)](#) (Accessed 12/07/23)

<sup>144</sup> Analysis of Cycling Potential 2010 [Analysis of Cycling Potential \(tfl.gov.uk\)](#) (Accessed 17/07/23)

<sup>145</sup> Harrow Sustainable Transport Strategy 2013 [Microsoft Word - TARSAP Report - Sustainable Transport strategy - Appx A - Feb 13.doc \(harrow.gov.uk\)](#) (Accessed 02/08/23)

<sup>146</sup> Harrow Transport Local Implementation Plan [harrow-transport-local-implementation-plan](#) (Accessed 12/07/23)

<sup>147</sup> Harrow Authority Monitoring Report (2017-2019) [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](#) (Accessed 26/07/23)

<sup>148</sup> Mayor's Transport Plan 2018 [Mayor's Transport Strategy \(london.gov.uk\)](#) (Accessed 12/07/23)

<sup>149</sup> Parking Management Programme 2022/23 [REPORT FOR: \(harrow.gov.uk\)](#) (Accessed 02/08/23)

<sup>150</sup> Proposed Parking Management Programme 2022/23. [Appendix D \(harrow.gov.uk\)](#) (Accessed 02/08/23)



## 9.2 Sustainability Issues

The following sustainability issues have been identified:

- A backlog on road maintenance suggests that road conditions are remaining in poor condition for long periods of time, creating issues for vehicles and cyclists;
- Accessibility to public transport is low in some areas of deprivation, particularly to the North of the Borough; creating a significant reliance on the petrol or diesel-fuelled private car as the main mode of transport within the Borough;
- The proportion of workers using sustainable transport mode to get to work can be improved;
- There are a number of barriers to cycling in the Borough, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft;
- Uncertain growth in private car ownership could contribute to further air pollution, and associated impacts on climate, human health and biodiversity;
- Harrow bus station is operating over capacity;
- Accessible, step-free entrances are not available at all tube stations;
- Increasing parking pressure in the Borough; and
- There is a need to encourage more walking and cycling, including making improvements to safe and direct cycling routes across the Borough, to reduce high levels of private car use and existing congestion issues

## 9.3 Likely Evolution without the Local Plan

Poor cycle networks could restrict the expansion of people using cycling as a means to travel. Most of the cycle networks are currently focused on recreational use rather than for those who need to use them to gain access to work or local amenities. 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. Use of plug-in vehicles is increasing rapidly and will likely continue with the expansion of the ULEZ into the Borough. Current public and sustainable transport options may not meet the needs of the future population in the long term, which is expected to increase.

## 9.4 Data Gaps

identified. The Harrow Council Infrastructure Delivery Plan is currently being produced. This may assess capacity of transport infrastructure and whether new/enhanced cycling, walking, bus, road infrastructure may be required.



## 10.0 Air, Noise and Light

### 10.1 Baseline

#### Air

Harrow's air quality levels are moderate, with levels of NO<sub>2</sub> sitting at 25.8 (ug/m<sup>3</sup>)<sup>151</sup>, levels of PM<sub>10</sub> between 19-22 (ug/m<sup>3</sup>), and levels of PM<sub>2.5</sub> at 10.9 (ug/m<sup>3</sup>)<sup>152</sup>. The entirety of Harrow Borough has been a designated Air Quality Management Area (AQMA) since 2002. This is declared due to previous exceedance of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>)<sup>153</sup>. It is also designated as an AQMA as authorities believe that it is unlikely to reach, and stick to, emissions targets, such as for PM<sub>2.5</sub> (10 µg/m<sup>3</sup> or below) and NO<sub>2</sub> (40µg/m<sup>3</sup> or below). The main sources of air pollution are highlighted in Section 11 (Climatic Factors).

There are four areas deemed as Air Quality Focus Areas (AQFAs) within Harrow. These areas are highlighted in Figure 10.1, and can be found in:

- Harrow and Wealdstone (St George Gange Way)
- Harrow-on-the-Hill (College Road/Greenhill Way/Lowlands Road)
- Stanmore (The Broadway)
- Burnt Oak (A5 Broadway/Watling Avenue)

These are areas that exceed the EU annual mean limit for nitrogen dioxide (NO<sub>2</sub>) and have high human exposure. These AQFAs have also been identified to highlight areas that may not fully resolve their poor air pollution issues, despite national, regional, and local air quality measures<sup>154</sup>.

The Borough aims to improve its emissions to air from transport<sup>155</sup>. An Ultra Low Emission Zone (ULEZ) is currently in operation in Inner London, charging vehicles that do not meet required emission standards to enter the city. The ULEZ has been extended at the end of August 2023 to include all Boroughs of London, including Harrow<sup>156</sup>.

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<sup>151</sup> London Health Burden- Air Pollution

[london health burden of current air pollution and future health benefits of mayoral air quality policies january2020.pdf](#) (Accessed 17/07/23)

<sup>152</sup> Annual Pollution Maps [London Air Quality Network » Annual Pollution Maps](#) (Accessed 13/07/23)

<sup>153</sup> Air Quality Management Areas (AQMA) [Local Authority Details - Defra, UK](#) (Accessed 13/07/23)

<sup>154</sup> The London Plan 2021. [the london plan 2021.pdf](#) (Accessed 27/07/23)

<sup>155</sup> The Climate and Ecological Emergency- Harrow's Interim Strategy and Actions [Appendix Interim Strategy and Action Plan.pdf \(harrow.gov.uk\)](#) (Accessed 13/07/23)

<sup>156</sup> [Harrow - Transport for London \(tfl.gov.uk\)](#) (Accessed 12/07/23)



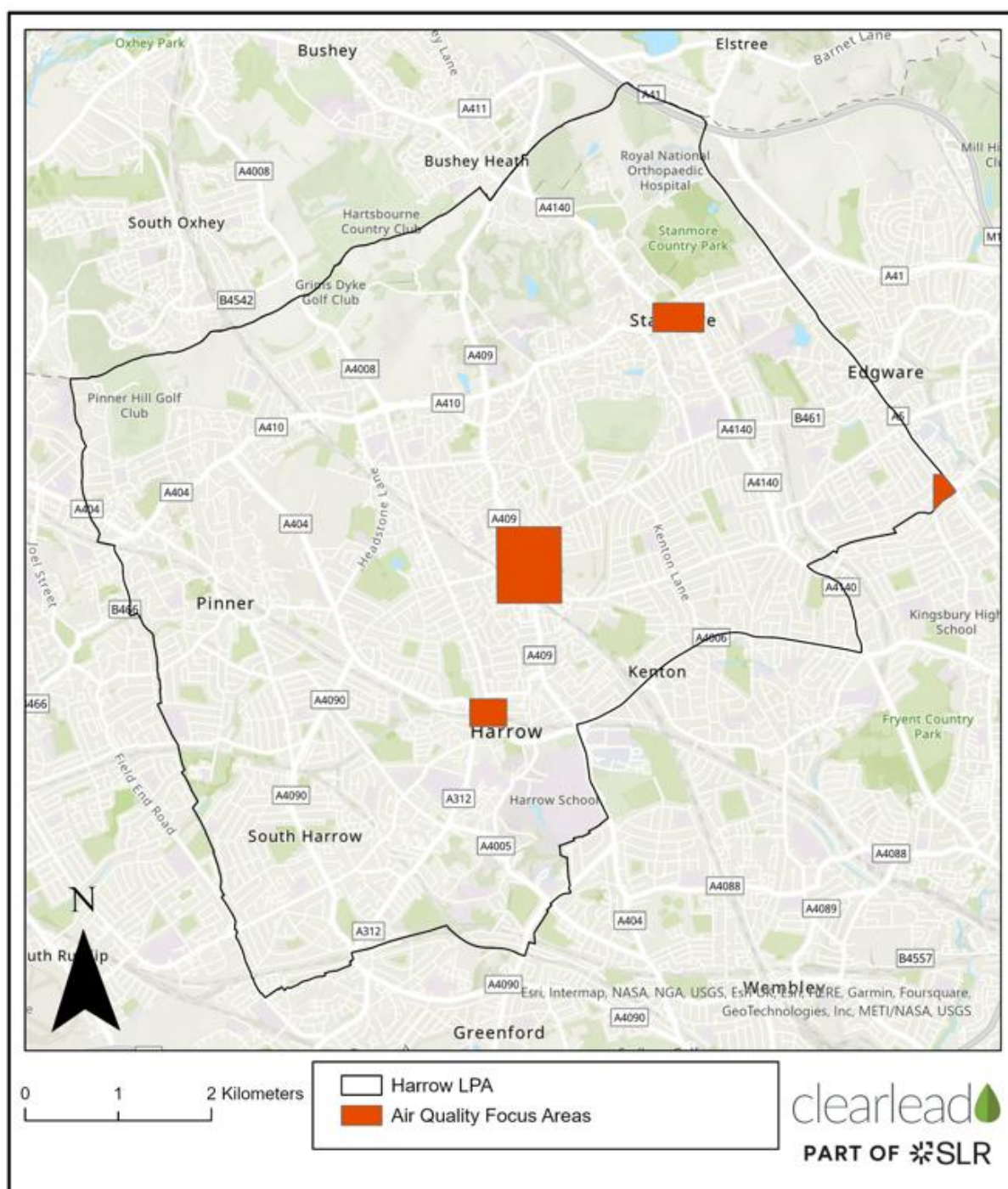


Figure 10.1: Air Quality Focus Areas in Harrow (Source: London Datastore, 2019)

### Noise

Generally, higher levels of noise pollution are experienced in the centre of the Borough, where there is greater urbanisation and key transport links. Noise across the Borough is generally associated with roads and rail (national and tube line) links. Significant noise pollution is currently an issue surrounding the A409, Watford Road



and Kenton Road, with average noise levels reaching over 75.0 dB<sup>157</sup>. Noise pollution can also be generated by development and industrial use. The Agent of Change Principle in the London Plan highlights that any new developments should incorporate measures to mitigate and manage any noise impacts for neighbouring residents and businesses<sup>158</sup>.

## Light

Light pollution is caused by excessive or intrusive artificial light arising from poor or insensitive design. Light pollution can have a detrimental effect on character and amenity of an area, as well as the wildlife present, after dark. London is considered as the brightest region in the UK, with a mean brightness value of 30.53; this value is almost 10 times higher than the 2<sup>nd</sup> brightest region's average<sup>159</sup>.

Light pollution is focused towards the centre, and the north of the Borough, with levels exceeding 32 NanoWatts/cm<sup>2</sup>/sr. The East and West of the Borough experience between 16-32 NanoWatts/cm<sup>2</sup>/sr. The smallest levels of light pollution are focused towards the South of the Borough- notably Harrow on the Hill- with standard pollution levels sitting between 8-16 NanoWatts/cm<sup>2</sup>/sr<sup>160</sup>.

Harrow is currently in the process of replacing old street lighting with LED bulbs, in order to increase energy efficiency.

## 10.2 Sustainability Issues

- There is significant reliance on the petrol or diesel-fuelled private car as the main mode of transport within the Borough;
- The entire Borough is an AQMA and air pollution levels could be improved;
- Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues;
- There is the potential for adverse impacts on wellbeing if inappropriate new development is located near a major source of noise, including any existing or new major roads;
- There is a need to reduce light pollution and restrict further intensification of light pollution from new developments; and
- Noise, air and light pollution could be generated through construction works, as well as the development of new homes, in the Borough, resulting from growth proposed in the Local Plan.

## 10.3 Likely Evolution without the Local Plan

Uncontrolled development could lead to development in areas which currently experience manageable levels of noise and light pollution. Without policy intervention and significant investments, the target to achieve carbon neutrality and therefore

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<sup>157</sup> Harrow Noise Levels [Extrium > England Noise and Air Quality Viewer](#)

<sup>158</sup> The London Plan (2021) [london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://london.gov.uk/sites/default/files/the_london_plan_2021.pdf) (Accessed 28/09/23)

<sup>159</sup> CPRE- England's Light Pollution and Dark Skies 2016 [Microsoft Word - CPRE Light Pollution Mapping](#) (Accessed 06/07/23)

<sup>160</sup> England's Light Pollution and Dark Skies. [England's Light Pollution and Dark Skies \(cpre.org.uk\)](https://cpre.org.uk) (Accessed 13/07/23)



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.

#### **10.4 Data Gaps**

No data gaps have been identified.



## 11.0 Climatic Factors

### 11.1 Baseline

#### Flood Risk

There are approximately 80kms of rivers and watercourses within Harrow Borough. The Borough lies within a number of river catchments, including the Crane, the Colne and the Brent.

- Yeading Brook rises near Headstone Manor and flows to join the River Crane;
- The River Pinn rises in Harrow Weald Common and flows Eastward to join the River Colne, and eventually the River Thames; and
- Wealdstone Brook rises in Headstone and flows Southward to join the River Brent.

The presence of these waterbodies has created areas of medium and high flood risk areas within the Borough. As shown in Figure 11.1, Harrow has Flood Zone 2 (medium probability of flooding- equivalent to between 0.1-1.0% annual probability of flooding) and Flood Zone 3 (high probability of flooding- equivalent to greater than 1% annual probability of flooding) The location of the flood zones highlights that the areas at a higher risk of flooding exist to the East and West of the Borough.





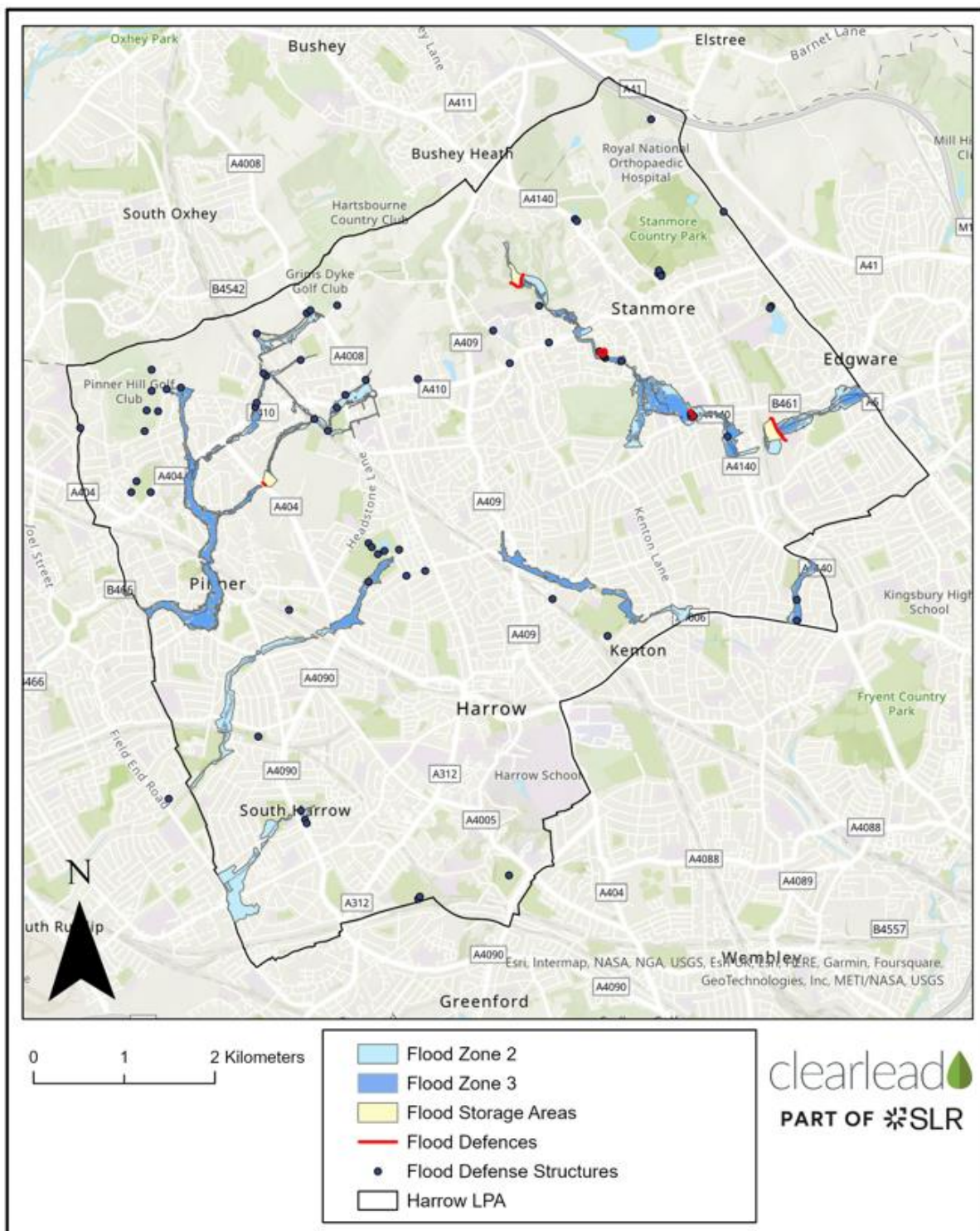
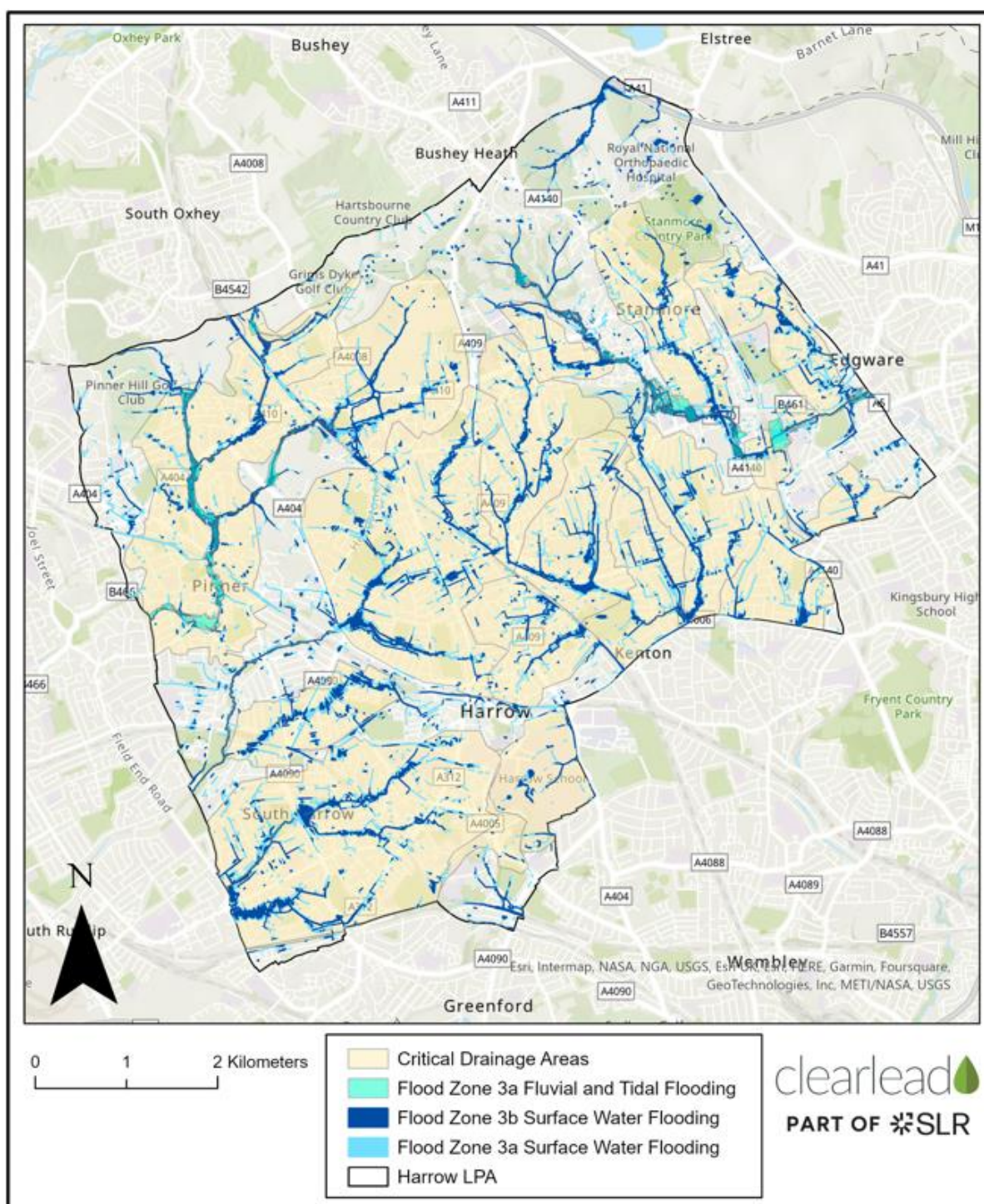


Figure 11.1: Flood risk areas and flood defences in Harrow





**Figure 11.2: Critical Drainage Areas, and areas at risk of fluvial, tidal and surface water flooding.**

As shown in Figure 11.2, Harrow is at a high risk of surface flooding across the Borough. This is mostly a result of increased urbanisation, loss of green space/natural permeable surfaces, and the increased volume of surface water



draining directly and rapidly into the surface water network<sup>161</sup>. According to the Harrow Council 2014 Flood Investigation Report [Error! Bookmark not defined.](#), the underlying causes of flood risk in the Borough included drainage network issues, public foul, and surface water problems with insufficient capacity and poorly maintained assets (e.g. pumping stations). Highway drainage issues also cause many flood-related calls, due to poorly maintained roadside gullies which prevents surface water from flowing away<sup>162</sup>.

Figure 11.2 also highlights Critical Drainage Areas (CDAs). These areas were locally defined by Harrow Borough and do not include areas with critical drainage problems as designated by the Environment Agency. Severe weather- such as heavy rainfall- leaves CDAs at risk from multiple types of flood risk but surface water flooding is most commonly associated<sup>163</sup>.

Although mentioned in Figure 11.2, the Borough is not likely to be impacted by tidal flooding due to its distance from the River Thames. Other Boroughs in the sub-region of West London are at risk from tidal flooding, however the Thames Tidal Defences (TTD) and the Thames Barrier provide protection within the floodplain up to a 1 in 1000-year event. Harrow is however at risk of fluvial flooding, which is represented in Figure 11.2. As mentioned above, this is due to Harrow being located within three river catchments- the River Crane, the River Colne (fed into by the River Pinn), and the River Brent. When high rainfall exceeds the drainage capacity of these waterbodies, flash flooding can occur quickly. These rivers can be seen in Figure 11.3

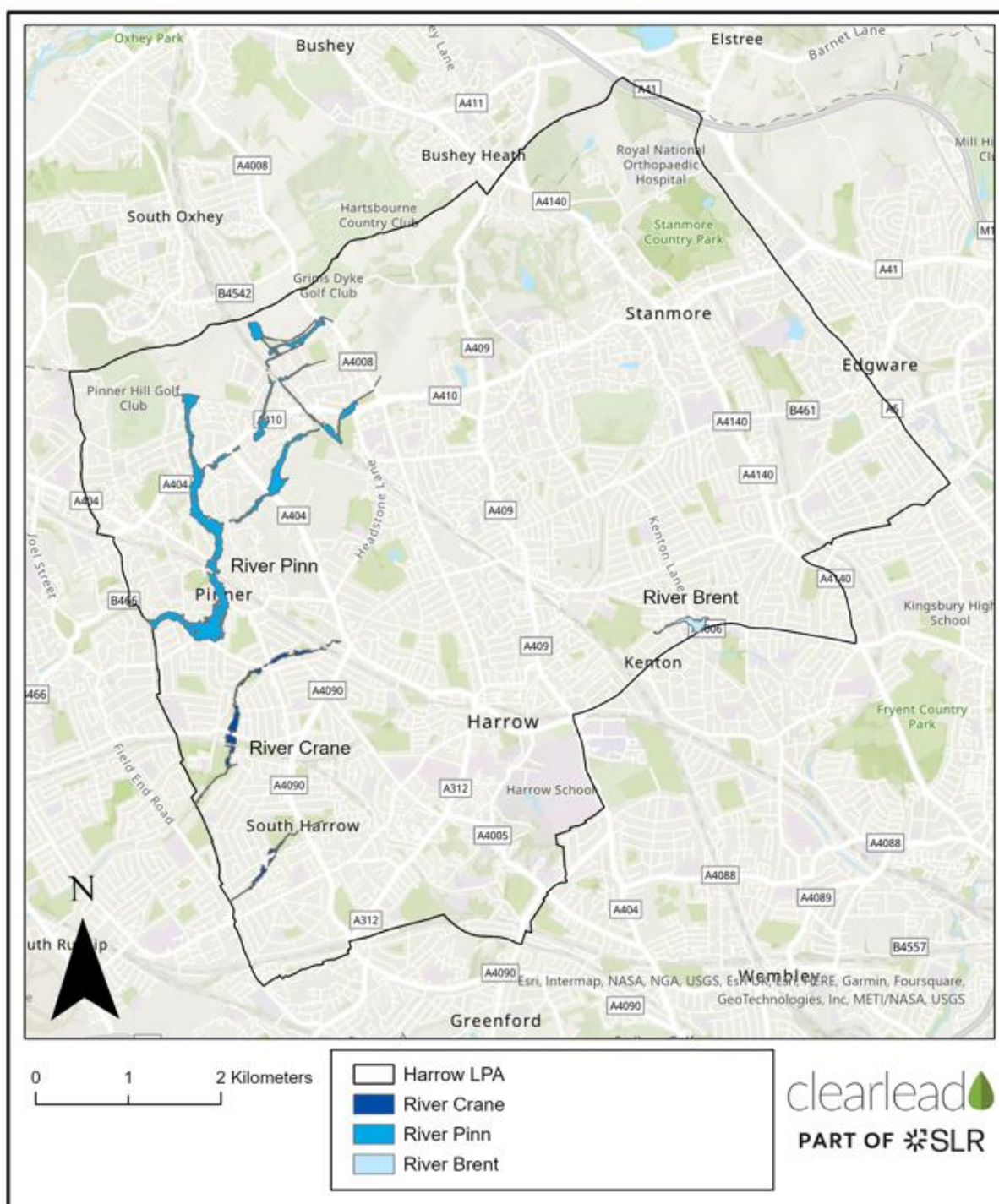
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<sup>161</sup> [3. Sources and Assessment of Flood Risk - West London Strategic Flood Risk Assessment \(westlondonsfra.london\)](#) (Accessed 05/09/23)

<sup>162</sup> Flood Investigation Report Harrow Winter 2013/14. [S.19 Flood Investigation Report \(harrow.gov.uk\)](#) (Accessed 12/07/2023)

<sup>163</sup> [3. Sources and Assessment of Flood Risk - West London Strategic Flood Risk Assessment \(westlondonsfra.london\)](#) (Accessed 05/09/23)





**Figure 11.3: Rivers in Harrow**

Climate change is expected to increase the likelihood of flooding in the sub-region. Harrow is expected to become increasingly vulnerable to fluvial, surface water and ordinary watercourse flooding, as extreme weather events become more frequent.



The risk of tidal flooding in the Borough is not expected to increase as a result of climate change<sup>164</sup>

Harrow Council, in partnership with neighbouring Boroughs and other stakeholders have established a number of initiatives to address flood risk issues in the wider area. The ‘Action for the Silk Stream’ resilience project was created in partnership with Barnet Council and aims to utilise nature-based solutions to restore the Silk Stream tributary of the River Brent. This is expected to reduce flood risk and increase biodiversity prospects. Within Harrow there is potential to install an overflow channel next to Boot Pond in Bentley Priory, create shallow basins and rain gardens in Morecambe Gardens, and de-culvert a piped watercourse and create natural flood basins in the green space on Beatty Road<sup>165</sup>. A number of flood defences have also been constructed within the Borough, in order to mitigate flood risk; 70 flood defence structures, 1 dry impounding reservoir and 2 statutory reservoirs have been put in place across Harrow. These defences can also be seen in Figure 11.1.

### Emissions Contributing to Climate Change

Per capita CO<sub>2</sub> emissions within Harrow were estimated to be 2.5 t/CO<sub>2</sub> in 2020. Table 11.1 highlights the level of Emissions released per category within the Borough, London and England. The table highlights that domestic CO<sub>2</sub> emissions were the most significant contributor within Harrow, followed by transport. Figure 11.4 highlights how different emissions categories have changed over time in Harrow.

Table 11.1 : Carbon Dioxide Emission Estimates, 2020 <sup>166</sup>			
Emissions Category	Harrow Borough	London	England
Industry (kt CO <sub>2</sub> )	21.2	1878.0	50566.9
Commercial (kt CO <sub>2</sub> )	42.4	4545.4	20447.2
Domestic (kt CO <sub>2</sub> )	342.4	10272.8	76632.3
Transport (kt CO <sub>2</sub> )	186.2	8085.6	89510.9
Total (kt CO <sub>2</sub> )	592.2	24781.8	237157.3
Per Capita Emissions (t)	2.5	3.2	5.1

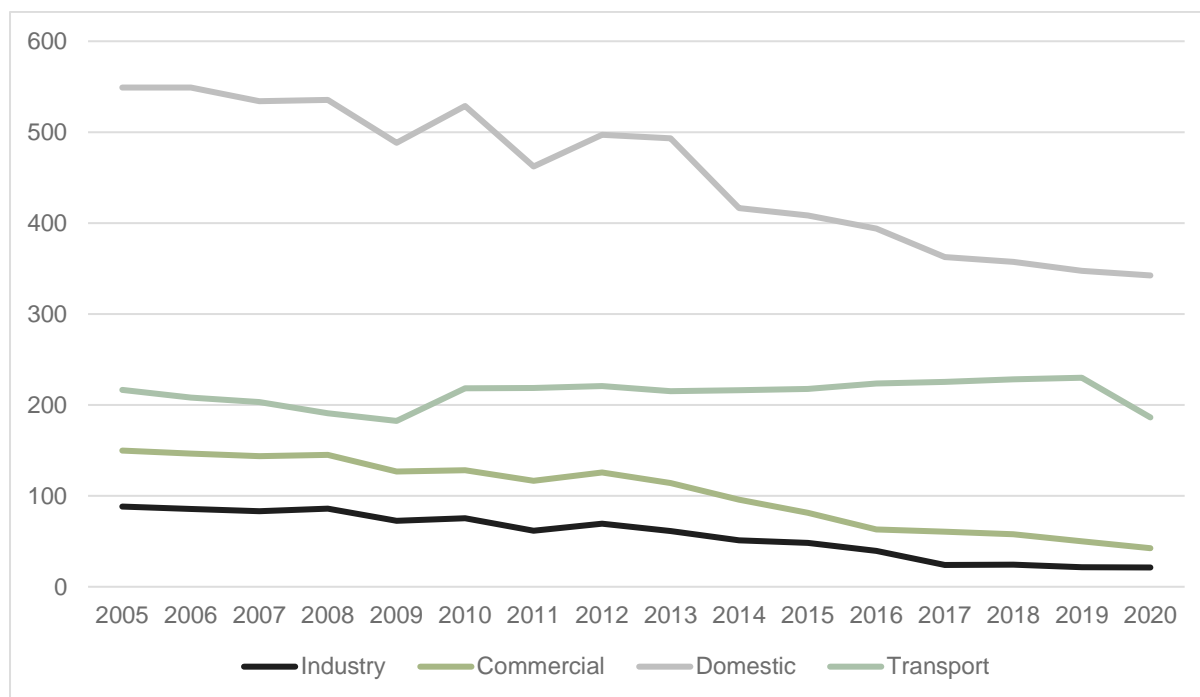
Source: Department for Energy Security and Net Zero- UK Local Authority and Regional Greenhouse Gas Emissions)

<sup>164</sup> Fluvial and Tidal Flood Risk Map [Fluvial & Tidal Flood Risk \(arcgis.com\)](https://arcgis.com) (Accessed 20/07/2023)

<sup>165</sup> Action for Silk Stream, Thames 21. [Action for Silk Stream - Thames21 Action for Silk Stream Project Booklet \(thames21.org.uk\)](https://thames21.org.uk) (Accessed 13/07/2023)

<sup>166</sup> Greenhouse Gas Emissions UK. [UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (Accessed 06/07/23)





**Figure 11.4: Total CO<sub>2</sub> emissions (kt CO<sub>2</sub>) per category in Harrow Borough (Source: Department for Energy Security and Net Zero- UK Local Authority and Regional Greenhouse Gas Emissions)**

Housing in Harrow is likely to be a large contributor to CO<sub>2</sub> emissions; it is suggested that Harrow’s housing stock has poor energy efficiency, due to the age of many of the buildings<sup>167</sup>. Energy improvements are taking place across the Borough however, with a recent £2.1 million being allocated from the Government’s Social Housing Decarbonisation fund to improve council homes within Harrow. This funding, alongside £3 million of investment from London Borough Harrow Council, will improve 236 council homes across the Borough. The scheme is also piloting new green technologies, including the installation of solar panels, under floor insulation, and low energy lighting<sup>168</sup>.

The London Plan (2021) addresses building energy efficiency in Policy S12 (Minimising greenhouse gas emissions); it highlights that major new developments should meet a minimum on-site reduction of at least 35% beyond Building Regulations. More specifically, residential development should achieve 10% reduction, and commercial development should achieve 15% reduction through energy efficiency measures<sup>169</sup>

There were 1265 out of 89,800 homes recorded with solar photovoltaics installed across Harrow at the end of 2021. Solar photovoltaics are the only source of

<sup>167</sup> Harrow Local Economic Assessment 2019-2020, Environmental Infrastructure and Sustainability [environmental-infrastructure-and-sustainability.pdf \(harrow.gov.uk\)](https://www.harrow.gov.uk/sites/default/files/2021-08/environmental-infrastructure-and-sustainability.pdf) (Accessed 29/08/23)

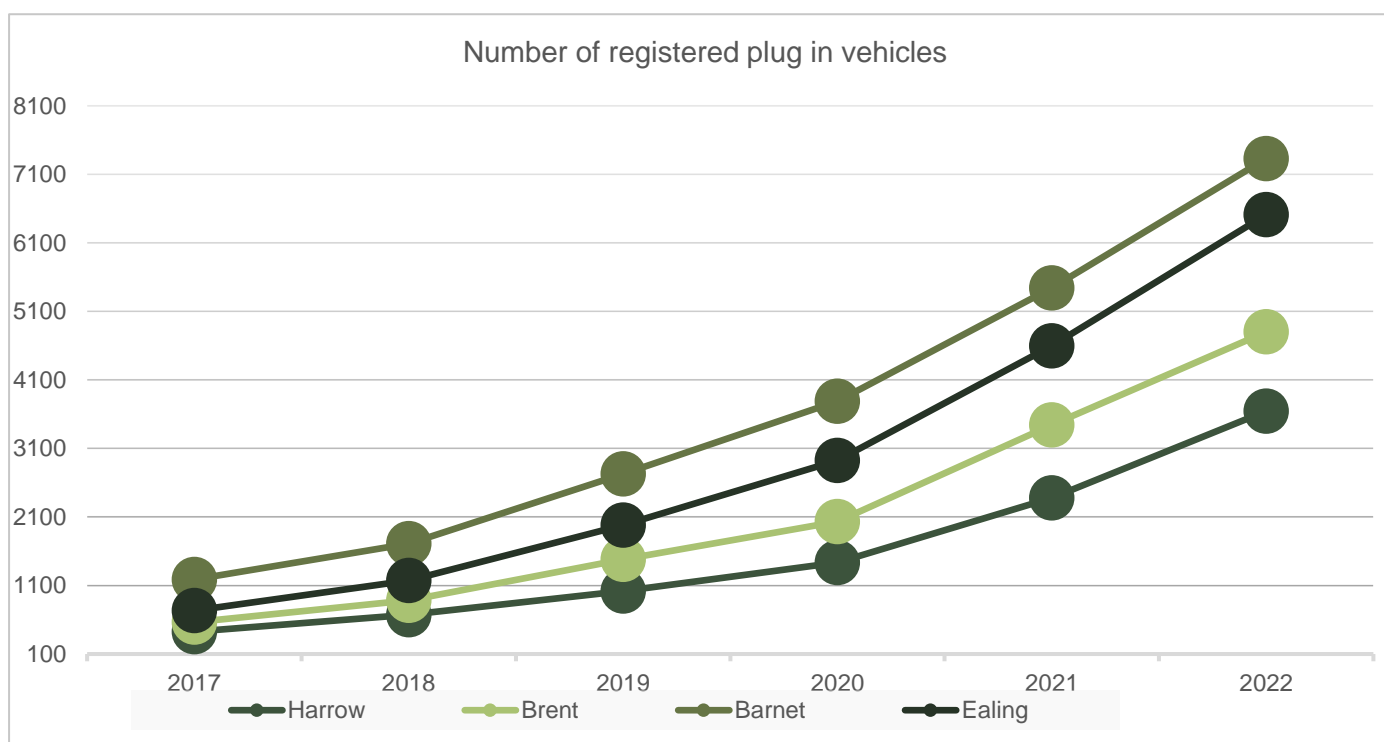
<sup>168</sup> [Council homes set for millions of pounds in energy improvements – London Borough of Harrow](https://www.harrow.gov.uk/news/council-homes-set-for-millions-of-pounds-in-energy-improvements-london-borough-of-harrow) (Accessed 29/08/23)

<sup>169</sup> The London Plan (2021) [the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/plan-and-policy/the-london-plan-2021) (Accessed 29/08/23)



renewable energy generation in the Borough, providing a capacity of 5.4MW<sup>170</sup>. The London Plan (2021) states that major developments within Heat Network Priority Areas should be developed with a communal low-temperature heating system in mind, that utilises low emission CHP and ultra-low NOx gas boilers<sup>171</sup>.

There has been a significant increase in low emission plug-in vehicles (both cars and light goods) within Harrow and its surrounding Boroughs between 2017 and 2022. Figure 11.5 shows that by the end of 2022, there were 3,645 plug-in vehicles registered in Harrow. This is significantly higher than in 2017, when 427 plug-in vehicles were registered in the Borough. As shown by the graph, there is a general upward trend in the ownership of plug-in vehicles across London Boroughs<sup>172</sup>.



**Figure 11.5: The number of registered plug-in vehicles in Harrow, and neighbouring Borough’s, since 2017 (Source: Department of Transport- Vehicle Licensing Statistics Data Tables)**

In 2019, Harrow adopted a climate emergency declaration, and as a result has set a target of carbon neutrality by 2030<sup>173</sup>. Following the development of London’s Climate Change Strategy, a Joint Statement on Climate Change was produced containing seven ambitions, including: retrofit London; low carbon development; low

<sup>170</sup> Renewable Energy by Local Authority 2005-2021. [Regional Renewable Statistics - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/regional-renewable-statistics) (Accessed 06/07/23)

<sup>171</sup> The London Plan (2021) [the london plan 2021.pdf](#) (Accessed 30/08/23)

<sup>172</sup> Department for Transport- Plug-in cars and light goods vehicles licensed [Vehicle licensing statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/vehicle-licensing-statistics-data-tables) (Accessed 06/07/23)

<sup>173</sup> London Councils- Borough Climate Actions Plans and Targets [Borough Climate Action Plans and Targets | London Councils](#) (Accessed 06/07/23)



carbon transport; renewable power for London; one world living; building the green economy; and creating a resilient and green London. Harrow has been appointed the lead Borough in the fight to reduce consumption emissions by two thirds, focusing on food, textiles, electricals and plastics<sup>174</sup>.

### Climate Change Impacts

Climate change could lead to changes in the natural environment due to changing climate such as increased temperatures, extreme weather events- particularly heavy rainfall/flooding and heat waves- and water scarcity. This may affect the environment directly, by changing the distribution of local species, or indirectly through changes to land management and local habitats. Water scarcity is expected to become more common as temperatures increase. In developed countries such as the UK, this is likely to take the form of physical water stress (e.g. there is not enough water to meet the populations needs). As Harrow is already within a water stressed area- the South East of England is determined as permanently water stressed<sup>175</sup>- a worsening of this due to climate change could have large implications for residents. New development planned over the Local Plan period should provide opportunities to manage the effects of climate change, through ensuring that flood risk is managed effectively (for example through the provision of sustainable drainage systems, reconnecting rivers to the floodplains and improved land management), by helping to offset carbon emissions (tree planting in new development or within large scale green infrastructure projects) and through the provision of green spaces to influence local (micro) climates (urban cooling). New development would also be likely to improve the overall energy efficiency of the Borough's housing stock. However, the Local Plan will not be able to deliver energy efficiency improvements beyond those set out in Part L of the Building Regulations.

Climate risk refers to the exposure and vulnerability of populations to climate change. London Climate Risk Maps highlight Harrow has relatively low climate risk, particularly in comparison to neighbouring Borough's such as Brent. Impact is spatial however, as shown in Figure 11.6 - areas within central Harrow, as well as south-east of the Borough, appear to be at higher risk of climate change than areas in the North and West<sup>176</sup>. High climate risk usually coincides with areas of low income and health inequalities, and this appears to be the case in Harrow with areas to the South and Centre of the Borough being some of the most deprived.

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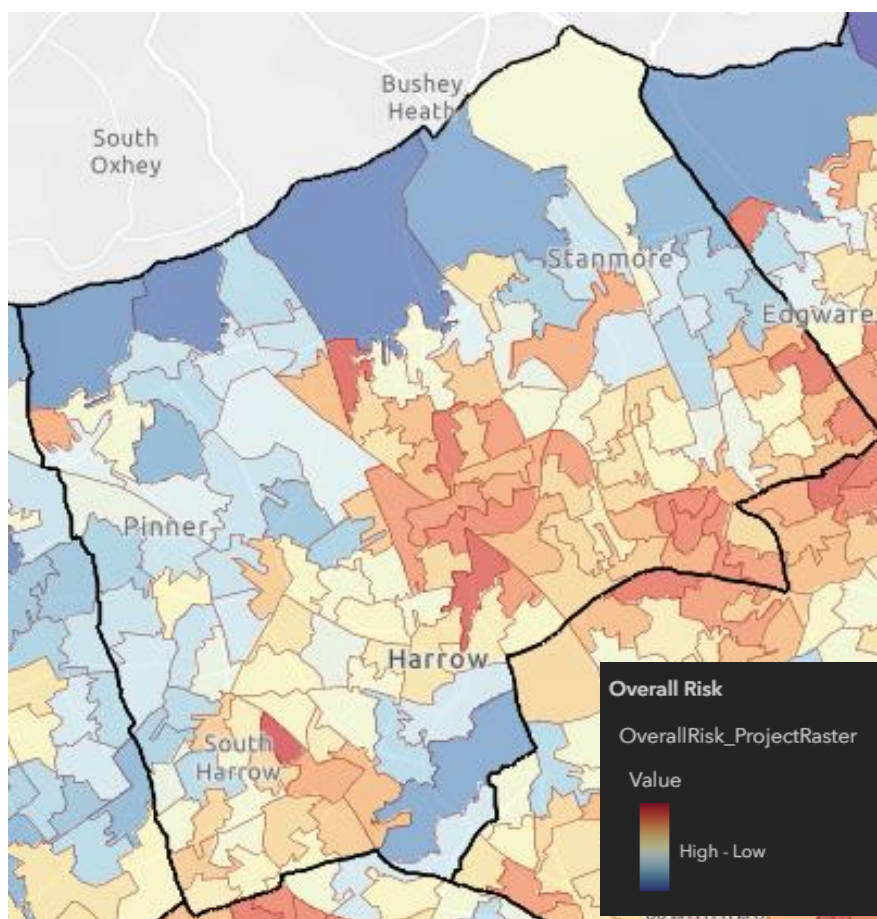
<sup>174</sup> London Councils- Climate Change [Climate change | London Councils](#) (Accessed 06/07/23)

<sup>175</sup> [Water stressed areas – 2021 classification - GOV.UK \(www.gov.uk\)](#) (Accessed 29/09/23)

<sup>176</sup> London Climate Risk Maps, London Assembly [Climate Risk Map | London City Hall](#) (Accessed 29/08/23)







**Figure 11.6: Climate Risk in Harrow Borough (Source: London Assembly- London Climate Risk Maps)**

## 11.2 Sustainability Issues

- It is important to become more resilient to the wider effects of climate change through adaptation measures. New developments need to minimise vulnerability and provide resilience to climate change, including implementing adaptation measures in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding and heat waves;
- Surface flooding is a particular issue in the Borough;
- Green Infrastructure presents opportunities to address multiple issues through multifunctional spaces;
- New development will need to incorporate sustainable drainage systems to sustainably reduce flood risk;
- New developments will need to incorporate low-carbon and renewable energy to minimise carbon emissions;
- Solar is currently the only form of renewable energy generation in the Borough;
- Domestic and transport emissions are the main contributors of CO<sub>2</sub> in the Borough; and



- Need to work with communities to help tackle climate change.

### 11.3 Likely Evolution without the Local Plan

Continual growth in the Borough both from development and population growth may increase the effects of climate change. Climate change could increase the number of properties at risk from flooding as more extreme rainfall events take place. National Policy is likely to restrict significant large-scale growth from coming forward in areas subject to flood risk even in the absence of a Local Plan, unless developers can demonstrate that no areas at lower risk are available to meet development needs and schemes can be made safe in the event of flooding.

There is likely to be continued and increasing pressure on water resources. Water resources will be squeezed in the short to long term as a result of increased development, coupled with climate change impacts, and reductions in water resources available (to protect environmentally sensitive areas).

Given the reliance on the private car as the main mode of transport within the Borough, ongoing increases in vehicle ownership, and the requirement for additional residential development, it could be considered likely that greenhouse gas emissions will rise in the future. The increasing use of electric vehicles could counteract this, however, local policy will be needed to reduce car-based development and encourage modal shift. Moreover, infrastructure to support electric vehicle use will need to be implemented, such as public charging points.

The current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

### 11.4 Data Gaps

No data gaps have been identified.



## 12.0 Biodiversity, Geodiversity, Flora and Fauna

### 12.1 Baseline

The term biodiversity refers to both the species richness and genetic diversity of flora and fauna present within a given area.

Around a fifth of land in Harrow is considered green open space<sup>177</sup>, some of which is designated locally and nationally for wildlife and geological value, which can be seen in Figure 12.1.

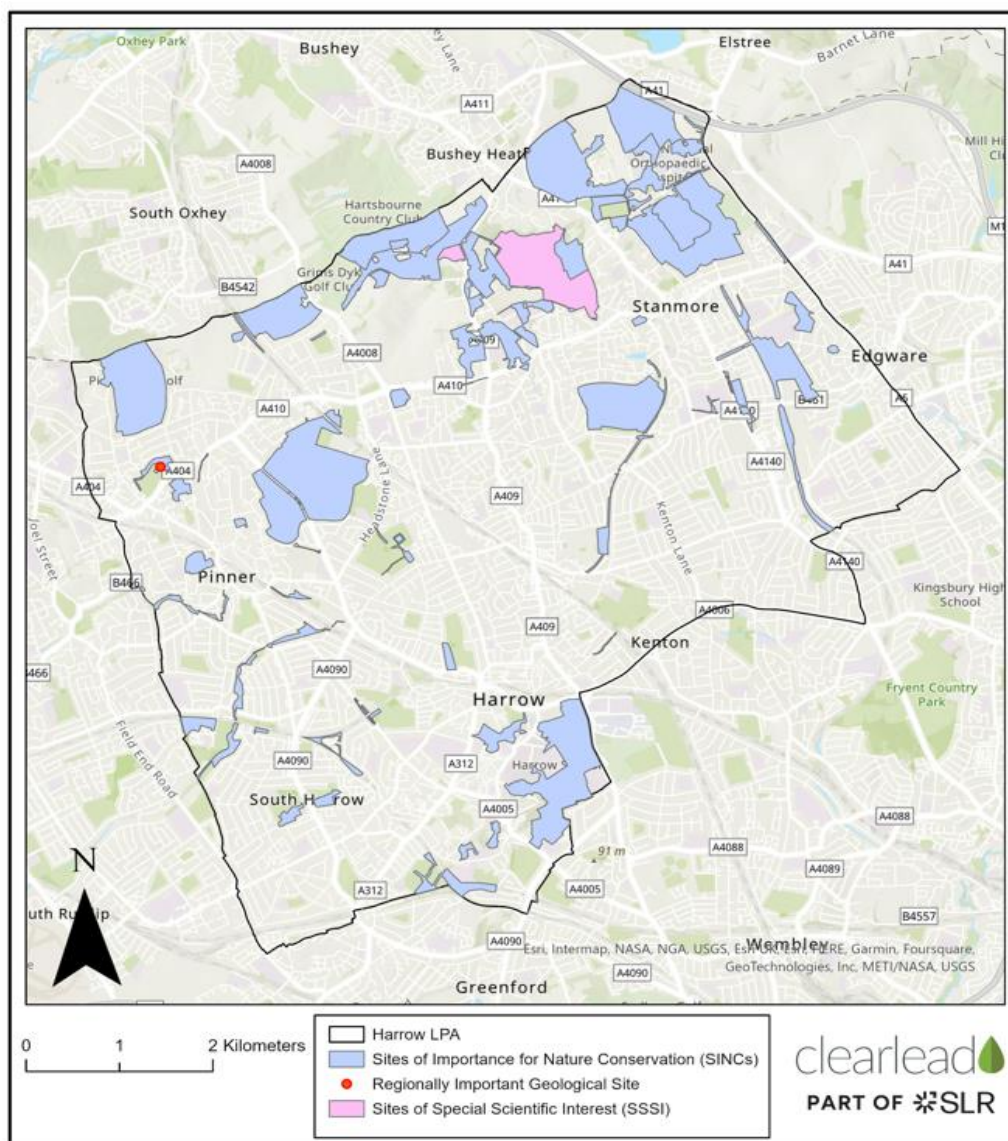


Figure 12.1: Designated wildlife and geological sites in Harrow

<sup>177</sup> Green Spaces in Harrow [Harrow's green spaces – London Borough of Harrow](#) (Accessed 13/07/23)



There are 44 Sites of Importance for Nature Conservation (SINC) identified within Harrow<sup>178</sup>. SINC are comprised of Sites of Metropolitan Importance, Sites of Borough Importance, and Sites of Local Importance. These include:

- 10 Local wildlife sites (LWS); these are managed with Biodiversity Action Plans (BAP)<sup>179</sup>
- 3 Local Nature Reserves (LNR) and 5 proposed Local Nature Reserves<sup>180</sup>
- 2 Regionally Important Geological sites (RIGs)<sup>181</sup>
- 2 Sites of Special Scientific Interest (SSSIs); these have a combined area of 60.3 ha<sup>182</sup>.

The current condition of Harrow’s designated sites is detailed within Table 12.1.

**Table 12.1: Biodiversity Sites in Harrow<sup>183</sup>**

	Type of Site	Classification of habitat(s)	Condition
<b>Bentley Priory</b>	SSSI, LNR	56.6 ha of grassland and woodland.	4 units in favourable condition
<b>Harrow Weald</b>	SSSI	3.7 ha of Pleistocene Stanmore gravel beds, overlying Claygate beds.	1 unit in unfavourable condition due to decline
<b>Pinner Chalk Mines</b>	RIGs	Disused chalk mine; contains Hertfordshire Puddingstone	Access has been rescinded due to health and safety concerns.
<b>Stanmore Common</b>	LNR	49.2 ha of woodland and heathland	Favourable condition
<b>Stanmore Country Park</b>	LNR	30.7 ha of acid grassland and woodland	Favourable condition
<b>Roxbourne Rough Nature Reserve</b>	Proposed LNR, SINC	13.0 ha of flower rich grassland	Favourable condition
<b>Roxeth Park Nature Area</b>	Proposed LNR, SINC	10.03 ha of flower rich grassland and hedgerows	Favourable condition

<sup>178</sup> [Microsoft Word – Biodiversity Final Version for Web 2015.doc \(harrow.gov.uk\)](#) (Accessed 11/07/23)

<sup>179</sup> Biodiversity in Harrow. [Biodiversity – London Borough of Harrow](#) (Accessed 12/07/23)

<sup>180</sup> Harrow Biodiversity Action Plan 2015-2020 [Microsoft Word - Biodiversity Final Version for Web 2015.doc \(harrow.gov.uk\)](#) (Accessed 13/07/23)

<sup>181</sup> List of London’s Geological Sites. [List of London’s Geological Sites – London Geodiversity Partnership \(londongeopartnership.org.uk\)](#) (Accessed 06/07/23)

<sup>182</sup> Sites of Special Scientific Interest [Site list \(naturalengland.org.uk\)](#) (Accessed 06/07/23)

<sup>183</sup> Sites of Special Scientific Interest [Site list \(naturalengland.org.uk\)](#) (Accessed 06/07/23)



**Table 12.1: Biodiversity Sites in Harrow<sup>183</sup>**

<b>Wood Farm</b>	Proposed LNR, SINC	22.0 ha of rough grassland and scrubland	Favourable condition
<b>Canons Park Spinney</b>	Proposed LNR, SINC	31.6 ha of improved grassland, broad leaved woodland	Favourable condition
<b>Belmont Trial</b>	LWS	2.76 ha of semi-improved neutral grassland, secondary woodland and scrub, and dead wood	Favourable condition
<b>Cedars Open Space</b>	LWS	3.13 ha of secondary woodland and dead wood	Favourable condition. No specific issues identified; patrolled regularly to spot potential safety issues.
<b>Celadine Route</b>	LWS	1.58 ha of secondary woodland, dead wood and allotments	Favourable condition
<b>Grims Ditch</b>	LWS	3.53 ha of secondary woodland, rough grasslands and old oaks	Favourable condition
<b>Headstone Manor</b>	LWS	3.04 ha of ancient and secondary woodland, dead wood and hedgerows	Favourable condition
<b>Old Redding Complex</b>	LWS	... of ancient and secondary woodland, relict acid grassland, dead wood and marsh	Favourable condition
<b>Old Tennis Courts</b>	LWS	1.3 ha of semi-improved grassland, secondary woodland and dead wood	Favourable condition
<b>Pinner Memorial Park</b>	LWS	5.05 ha of secondary woodland, dead wood, and veteran trees	Favourable condition
<b>Seven-Acre Lake</b>	LWS	4.5 ha of secondary woodland, standing and running water, and marshland	Favourable condition. Issues identified: prevalence of terrapins (invasive species)
<b>Stanmore Marsh</b>	LWS	3.93 ha of semi-improved grassland, broad leaved woodland	Favourable condition

Source: Natural England- Designated Sites View



One site within the London Borough of Harrow is considered important for geology and has thus been designated as a Regionally Important Geological Site (RIGs). This is :<sup>184</sup>

- Pinner Chalk Mines: extend over a large area and is not currently accessible to the public. The Chalk within the mines is expected to form part of the Seaford Chalk Formation. The Chalk Mines are also one of the few places where Hertfordshire Puddingstone can be found<sup>185</sup>.

No European designated Habitat Sites, such as Special Protection Area (SPAs) or Special Area of Conservation (SACs) are present within the 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. It is considered that there is potential for impact pathways to exist with the following Habitats Sites:

- Epping Forest Special Area of Conservation;
- Wormley-Hoddesdonpark Woods Special Area of Conservation;
- Chiltern Beechwoods Special Area of Conservation;
- Burnham Beeches Special Area of Conservation;
- Wimbledon Common Special Area of Conservation;
- Richmond Park Special Area of Conservation;
- South West London Waterbodies Special Protection Area;
- Windsor Forest & Great Park Special Area of Conservation;
- Thames Basin Heaths Special Protection Area;
- Thursley, Ash, Pirbright & Chobham Special Area of Conservation;
- Thames Estuary & Marshes Ramsar;
- Thames Estuary and Marshes Special Area of Conservation;
- Essex Estuaries Special Area of Conservation; and
- Medway Estuary & Marshes Special Protection Area.

Wimbledon Common and Richmond Park are the closest SAC's 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 B sets out information about these sites including their location, reasons for designation, current condition, vulnerabilities and factors affecting integrity. It is proposed that the Regulation 18 version of the Harrow Local Plan will be screened for potential Likely Significant Effects (LSEs) on these Habitats Sites. Should LSEs be identified, an Appropriate Assessment will need to be undertaken.

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<sup>184</sup> List of London's Geological Sites. [List of London's Geological Sites – London Geodiversity Partnership \(londongeopartnership.org.uk\)](https://londongeopartnership.org.uk) (Accessed 13/07/2023)

<sup>185</sup> London Geodiversity Partnership (Pinner Chalk Mines, Proposed RIGS). [Guide to London's Geological Sites \(londongeopartnership.org.uk\)](https://londongeopartnership.org.uk) (Accessed 13/07/2023)



Harrow has produced a Biodiversity Action Plan (2015-2020) highlights how Harrow plans to protect, enhance and promote the natural environment. This is done through SINC management plans, contributions to education and considerations of biodiversity in planning<sup>186</sup>.

## 12.2 Sustainability Issues

- There are a range of nature conservation sites within the Borough which require protection from development;
- There is a need to ensure that the minimum target of 10% biodiversity net gain is met;
- Potential effects on European designated Habitats Sites needs to be considered;
- Poor condition of some existing sites is likely to continue, and in some cases, further decline; and
- There is a need to the need to increase resilience of nature in light of climate change. Green spaces should be joined up, and water resources protected from damage.

## 12.3 Likely Evolution without the Local Plan

Without the Local Plan setting out a positive strategy for growth to meet future housing and commercial development needs, the location and scale of new development will be controlled through the development management process rather than through development being targeted to locations with greater environmental capacity. This could lead to the continued degradation and possible loss of habitat and species. The Local Plan could help safeguard existing sites of value, protect notable and protected species, and improve the management of locally important wildlife sites where these are integrated into development. Climate change will increase stress on habitats and species.

In the absence of the Local Plan it is likely that the number or extent of LNRs in the borough will remain similar to current provision, although ad-hoc opportunities may arise to increase overall provision.

## 12.4 Data Gaps

Harrow's Biodiversity Action Plan (2015-2020) is now outdated. Once a new strategy has been produced, relevant data will be updated. Forthcoming Local Nature Recovery Strategies (LNRS) will also add detail regarding sites and opportunities for biodiversity net gain.

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<sup>186</sup> Harrow Biodiversity Action Plan (2015-2020) [Harrow 2nd BAP](#) (Accessed 27/07/23)



## 13.0 Cultural Heritage

### 13.1 Baseline

There are around 300 listed buildings or structures within Harrow Borough. Grade I listings are considered of 'exceptional interest', Grade II\* listings are considered 'of more than special interest', and Grade II listings are considered 'special interest'. Harrow Borough contains 4 Grade I listed buildings, which are as follows:

- Headstone Manor;
- Harrow School;
- Parish Church of St Mary; and
- Church of St Lawrence.

The Borough also contains 20 Grade II\* listings, and 266 Grade II listings. There are 909 locally listed buildings within Harrow<sup>187</sup>, which are of importance due to the local interest and the positive contribution that they make to the townscape<sup>188</sup>.

Harrow contains 9 Scheduled Monuments. There are no World Heritage Sites located within the Borough<sup>189</sup>. There are 4 Grade II nationally Registered Parks and Gardens within the Borough, These are:

- Grims Dyke (Harrow Weald);
- Cannons Park (Edgware);
- Harrow Park (Harrow on the Hill); and
- Bently Priory (Harrow Weald)

Harrow contains 9 Archaeological Priority Areas (APA), which are protected due to evidence that historically beneficial below-ground archaeology exists. These areas are:

- Possible site of Roman settlement of Sullonicae (along Brockley Hill, Edgware);
- Edgware Village (along Edgware High Street, Edgware);
- Roman tile manufacture in Canons Park (Edgware);
- Medieval Stanmore (along Old Church Lane, Stanmore);
- Possible site of medieval Bentley Priory (east of Clamp Hill, Stanmore);
- Medieval Pinner (including the High Street and surrounding roads in Pinner);
- Old Pinner Deer Park (either side of George V Avenue, Pinner);

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<sup>187</sup> Locally Listed Buildings Map [HubMaps \(harrow.gov.uk\)](https://www.harrow.gov.uk/hubmaps) (Accessed 03/10/23)

<sup>188</sup> Locally Listed Buildings. <https://www.harrow.gov.uk/planning-developments/locally-listed-buildings> (Accessed 28/09/23)

<sup>189</sup> Listed Buildings, Scheduled Monuments, and Parks and Gardens in Harrow [The List Search Results for harrow | Historic England](https://www.historicengland.org.uk/listedbuildings/search/results/harrow) (Accessed 06/07/23)

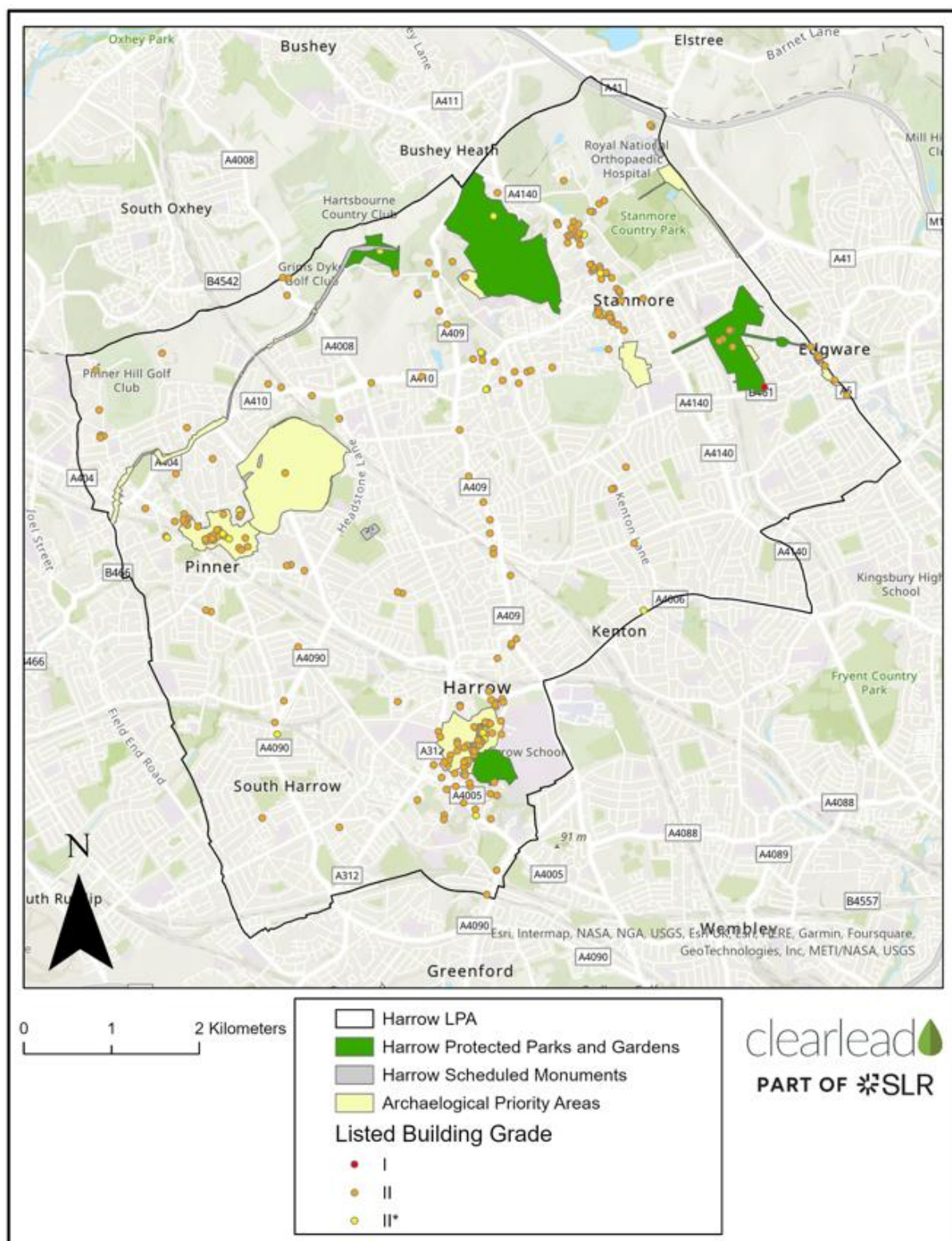




- Historic Harrow (core area of Harrow on the Hill); and
- Parts of Grim's Dyke (in Hatch End and Pinner).

Heritage assets in the Borough, including APAs, can be seen in Figure 13.1.





**Figure 13.1: Heritage assets and APAs within Harrow Borough**

There are 19 Heritage at Risk entries in the Borough, as detailed in Table 13.1.



**Table 13.1: Heritage at Risk Entries for Harrow Borough<sup>190</sup>**

Site Name	Designation(s)	Description of site	Condition	Specific Issues identified
Old Stanmore Church	Listed Building grade II*	Religious site from 1632.	Slow decay.	Roof has collapsed, allowing for rainwater ruin and erosion. Decayed mortar, brick, stone, and timber. Vertical cracking in the walling.
Bentley Priory	Registered Park and Garden, Listed Building, Grade II, SSSI	16 <sup>th</sup> century estate, improved in the last 18 <sup>th</sup> century. Now converted to a museum with residential units, and new housing in the grounds. Holds SSSI status.	Stable, but with significant localised problems.	None identified.
Pinner Deer Farm, Pinner Park Farm	Scheduled Monument	An ancient landscape (deer park) likely to have been built between AD 1200 and 1350,	Declining due to significant localised problems.	Scrub/tree growth.
Grim's Dyke	Listed Building Grade II* Three Scheduled Monuments (section extending 1500 yards northeast from Oxhey Lane, four linear sections between	Grounds laid out in the 1870s as the setting to a private residence, in the Tudor style. The grounds contain three scheduled monuments.	Declining due to significant localised problems.	Scrub/tree growth and permitted development.

<sup>190</sup> Harrow Heritage at Risk. [Heritage at Risk search results for harrow | Historic England](#) (Accessed 06/07/23)



**Table 13.1: Heritage at Risk Entries for Harrow Borough<sup>190</sup>**

	Uxbridge Road and Oxhey Lane, section north of Blythwood House). Registered Park and Garden			
Linear Earthworks in Pear Wood	Scheduled Monument	An earthwork feature comprising of a ditch and two banks across a 355m distance. Construction spans at least a millennium, from the Middle Bronze Age.	Stable, but with significant localised problems.	Scrub/tree growth.
Gate Pier (at entrance to Canons Drive)	Listed Building grade II	One of the two decorated early 18 <sup>th</sup> century gate piers, collapsed in a storm in early 2022 due to a tree fall. In discussion regarding repair and reinstatement.	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed	None identified.
Brick Kiln (Common Road)	Listed Building grade II	Lower part of an 18 <sup>th</sup> century brick kiln conical chimney, of which the upper part no longer exists. In urgent need of structural stabilisation and repair.	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed	None identified.
The Rayners Public House	Listed Building grade II	A virtually unaltered 1930s public house retaining its internal plan form and original fittings. The building is now in educational use following a repair scheme.	Repair scheme in progress.	None identified.



**Table 13.1: Heritage at Risk Entries for Harrow Borough<sup>190</sup>**

Boundary Wall (118-128 Stanmore Hill)	Listed Building grade II	18 <sup>th</sup> century brick wall with buttresses with chamfered bases. Listed Building Consent was approved in 2021 for repairs to the wall.	Poor condition (slow decay; solution agreed but not yet implemented)	Many bricks at the base have weathered away and parts require repointing.
Garden Wall (Bernays Garden)	Listed Building grade II	19 <sup>th</sup> century wall with buttresses. Repairs are currently underway.	Repair scheme in progress and (where applicable) end use or user identified.	Many of the bricks were significantly decayed and the wall was in need of repointing.
Pinner Park Farmhouse	Listed Building grade II	The building dates from circa 1750. It is two storeys with three bays plus hipped wing. Repairs have recently been carried out.	Poor condition (slow decay; no solution agreed)	There has been some damage from water penetration and the building is partly vacant.
Former White Hart Hotel	Listed Building grade II	17 <sup>th</sup> century three-storey stuccoed building with a hipped tile roof and wooden eaves cornice.	Poor condition (slow decay; no solution agreed)	The upper floors are in a poor condition after unauthorised works and there are holes in the walls and ceilings.
Former Wealdstone Police Station	Listed Building grade II	Former police station with magistrates' court. Built in 1908-9 in Free Tudor style. A mixed-use scheme for the building with offices, café and 6 flats was recently completed.	Fair condition (repair scheme in progress)	None identified.



**Table 13.1: Heritage at Risk Entries for Harrow Borough<sup>190</sup>**

Kenton Lane Farmhouse	Listed Building grade II	Two-storey former farmhouse built circa 1808, Flemish bond red brick with a hipped slate roof. Repairs and conversion to residential approved in 2013, linked to an adjacent housing scheme. Whilst the new homes have been built, works to the listed buildings have not been carried out.	Poor condition (Immediate risk of further rapid deterioration or loss of fabric; no solution)	The house and farm buildings were damaged by illegal entry in early 2019.
Old Pye House (West Street)	Listed Building grade II	The 15th century two-storey building was part of a larger hall building. It has a slate roof, timber-framed walls and gable ends with a central tie beam, and a plain kingpost. The south front is late 18th or early 19th century red brick.	Poor condition (Immediate risk of further rapid deterioration or loss of fabric; no solution)	The original first floor was removed when it was used as a plastics factory.
Kenton Lane former farm buildings	Listed Building grade II	Former farm buildings built circa 1808. The vacant buildings surround three sides of a designed courtyard. Conversion to residential approved in 2013, linked to an adjacent housing scheme. Whilst the new homes have been built, works to the listed buildings have not been carried out.	Poor condition (Immediate risk of further rapid deterioration or loss of fabric; no solution)	Farm buildings were damaged by illegal entry in early 2019.



**Table 13.1: Heritage at Risk Entries for Harrow Borough<sup>190</sup>**

Wall to west and north of Springbok House (Wood Lane)	Listed Building grade II	19 <sup>th</sup> century wall, 11 foot high, with stone copings, recessed in the centre to pass through the portecochere. The wall forms a curved forecourt and screening to Springbok House, now the Hussaini Shia Islamic Centre.	Poor condition (slow decay; solution agreed but not yet implemented)	A leaning section of the wall was deemed a dangerous structure by the Local Authority and was taken down in 2018 for safety reasons.
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Source: Historic England- Heritage at Risk Register



Harrow's Cultural Strategy (2018-2021) highlights how culture is shaped by Heritage, physical infrastructure, and diversity. Key cultural attractions in Harrow include St Mary's Church, Bentley Priory Museum, Headquarters to Fighter Command during the Battle of Britain, Harrow-on-the-Hill, West House, and Headstone Manor and Museum. Religious buildings such as temples, synagogues, and mosques also influence culture in the Borough<sup>191</sup>.

## 13.2 Sustainability Issues

The following sustainability issues have been identified:

- Heritage assets in the Borough could be negatively affected by new development which can erode the quality of the built environment and heritage features or sterilise or lead to the loss of existing heritage assets;
- Harrow contains 9 Archaeological Priority Areas which are protected due to evidence that historically beneficial below-ground archaeology exists or it may potentially exist (subject to further investigation);
- There are 909 locally listed buildings within Harrow, which are of importance due to the local interest and the positive contribution that they make to the townscape;
- There are 19 assets on the heritage at risk register generally due to slow decay and some localised problems; and
- The protection of the Borough's cultural heritage remains a significant issue for many local residents, businesses and community groups.

## 13.3 Likely Evolution without the Local Plan

Continual growth in the Borough and the increasing demand for housing, may mean development could negatively affect heritage assets.

## 13.4 Data Gaps

Harrow's Cultural Strategy (2018-2021) is now outdated. Once a new strategy has been produced, relevant data will be updated.

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<sup>191</sup> [Draft cultural strategy 2018-21 \(harrow.gov.uk\)](https://www.harrow.gov.uk/draft-cultural-strategy-2018-21) (Accessed 27/07/23)



## 14.0 Landscape and Townscape

### 14.1 Baseline

Harrow's land area contains 313 hectares of Metropolitan Open Land and 1,088 hectares of Green Belt. The Green Belt is located to the North of the Borough and separates Harrow from neighbouring Hertfordshire towns. As well as being environmentally and recreationally beneficial, the Green Belt is topographically beneficial as it provides views to and from the Surrey Hills and the North Downs<sup>192</sup>.

Harrow Borough falls within the National Character Area (NCA) of Northern Thames Basin. NCAs were updated and republished by Natural England in 2014. The last assessment of NCAs was undertaken in 2003, but whilst dated, this information is referenced in recent NCA reports and provides some context regarding the quality of landscapes within the Borough.

Landscape constraints exist within Harrow in relation to the height that housing developments- such as flat blocks- can be constructed. Harrow is best known for its imposing landmarks and attractive skyline ridges. As a result, eleven protected views are in place in order to conserve open views across the Borough and contribute to sense of place. Due to the low-rise form of development across the Borough, views and glimpses of dominant topographic features of the landscape- such as Harrow on the Hill (including St Mary's Church) and the Harrow Weald Ridge- are visible from many areas and add significantly to the quality of the local landscape. The protected views in Harrow are<sup>193</sup>:

- Harrow Recreation Ground;
- Harrow View;
- Old Redding;
- The Grove Old Space;
- Capital Ring, Harrow Playing Fields;
- St Ann's Road, Harrow Town Centre;
- West Harrow Recreation Ground;
- Capital Ring at Football Lane, Harrow on the Hill;
- Gayton Road;
- Proposed Country Park at Wood Farm; and
- Roxborough Road Footbridge.

The RAF Northolt Safeguarding Zone exists within the neighbouring local authority of Hillingdon restricting the height and location of developments within Harrow through the associated Statutory Safeguarding Technical Zone<sup>194</sup>. Areas of Article 4 direction are also in place across the Borough, to protect local amenities from development.

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<sup>192</sup> Harrow's Green Belt Management Strategy. [Microsoft Word - HarrowGreenBeltManagementStrategyappendix0.doc](#) (Accessed 13/07/23)

<sup>193</sup> Harrow Views Assessment 2012 [harrow-views-assessment.pdf](#) (Accessed 13/07/23)

<sup>194</sup> RAF Northolt Safeguarding Zone. [North Committee Addendum.pdf \(hillingdon.gov.uk\)](#) (Accessed 14/07/23)

Planning permission is required for the demolition of all or any part of any gate, fence, wall or other means of enclosure across 14 Conservation Areas in the Borough<sup>195</sup>.

Landscape character issues within Harrow were identified through a Landscape Character Assessment (LCA) of the Borough. Landscape character issues within the natural environment of Harrow included a lack of traditional habitat management (for woodlands, grasslands, heathlands and water bodies such as ponds), as well as a lack of public access in many areas. Landscape character issues within the built environmental of Harrow included neglected buildings, lack of security, and visual pollution<sup>196</sup>.

Harrow's topography is considered a key feature of the Borough's landscape. The North of the Borough- particularly around Harrow Weald Ridge- reaches elevations of over 160m AOD. This peak elevation decreases towards the Centre, with average elevation sitting between 30-60m AOD. The lowest elevations- around 10m AOD- are reached in the South of the Borough. An exception to this trend however is Harrow on the Hill, with reaches elevations of 120m AOD. This elevation anomaly has subsequently made Harrow on the Hill (and St Mary's Church) a distinctive feature of Harrow's landscape<sup>197</sup>.

There are 29 spaces designated as Conservation Areas in Harrow. Conservation Areas have been designated by the Borough Council to protect the character of many settlements and restrict inappropriate development. These villages often provide locally significant leisure and recreation locations and can play a key role in defining the character and identity of the Borough. Conservation areas can also help to protect key Borough assets. For example, there are over 10,000 protected trees in Harrow, due to either their presence within a Conservation Area, or because they are subject to a Tree Preservation Order.

Conservation Areas are described in Table 14.1.

Table 14.1: Conservations Areas in Harrow <sup>198199</sup>	
Area name	Reason for conservation
Little Common	Landscape and townscape quality, due to high quality, historic architecture mixed with open spaces.
Stanmore Hill	Townscape quality, due to sloping land and mix of buildings (high quality, historic architecture dating back to the 18 <sup>th</sup> century).
Old Church Lane	Townscape quality, due to high quality, historic architecture. There are a number of Grade II* listed buildings in the area.

<sup>195</sup> [New Article 4 directions – 2020-2021 – Conservation – London Borough of Harrow](#) (Accessed 02/08/23)

<sup>196</sup> Harrow's Green Belt Management Strategy. [Microsoft Word - HarrowGreenBeltManagementStrategyappendix0.doc](#) (Accessed 13/07/23)

<sup>197</sup> Harrow Views Assessment 2012 [harrow-views-assessment.pdf](#) (Accessed 13/07/23)

<sup>198</sup> Harrow Conservation Areas [Conservation areas – Conservation – London Borough of Harrow](#) (Accessed 13/07/23)

<sup>199</sup> New Harrow Conservation Area [Approval granted for West Drive and Bellfield Avenue conservation area – London Borough of Harrow](#) (Accessed 29/08/23)

**Table 14.1: Conservations Areas in Harrow<sup>198199</sup>**

Kerry Avenue	Townscape quality due to mix of building styles.
Edgware High Street	Townscape quality, due to high quality, historic architecture (dating back to the 16 <sup>th</sup> century).
Canons Park Estate	Landscape and townscape quality, due to mix of historic architecture. The estate contains a grade II listing dating back to 1747. The gardens contribute to landscape character.
Roxeth Hill	Landscape quality, due to topographical value.
Harrow School	Landscape and townscape quality, due to topographical value and varied townscape character. This is also an archaeological priority area.
Harrow Park	Landscape quality due to open spaces. This is also designated as a historic park.
Harrow on the Hill Village	Landscape and townscape quality, due to topographical and historical value. This is also an archaeological priority area.
Sudbury Hill	Townscape quality, due to high quality, historic architecture. There are a number of listed buildings in the area. A small section of the area is also a designated archaeological priority area.
South Hill Avenue	Townscape quality, due to high quality, historic architecture (dating back to the 19 <sup>th</sup> century).
Mount Park Estate	Landscape and townscape quality, due to open spaces and the historical value of buildings (dating back to the 19 <sup>th</sup> century).
Roxborough Park and The Grove	Landscape and townscape quality, due to topographical and historical value. There are a number of listed buildings in the area.
Harrow Weald Park	Landscape and townscape quality, due to the mix of historic architecture with the semi-rural location.
Brookshill Drive and Grimsdyke Estate	Landscape and townscape quality, due to the historical value of buildings (dating back to the 17 <sup>th</sup> century), and the rural location.
Waxwell Lane	Townscape quality due to mix of building styles.
Waxwell Close	Townscape quality, due to high quality architecture.
Pinner High Street	Townscape quality, due to high quality historic architecture.
Moss Lane	Townscape quality, due to high quality architecture.
East End Farm	Landscape and Townscape quality, due to high quality historic architecture mixed with open green space.
West Towers	Townscape quality, due to high quality architecture.

<b>Table 14.1: Conservations Areas in Harrow<sup>198199</sup></b>	
Tookes Green	Townscape quality, due to high quality historic architecture and Grade II listed monument.
Pinnerwood Park Estate	Landscape and Townscape quality, due to high quality architecture mixed with open green space.
Pinner Hill Estate	Landscape and Townscape quality, due to high quality architecture mixed with open green space.
Pinnerwood Farm	Landscape and Townscape quality, due to historic value buildings being mixed with open green space.
Rayners Lane	Townscape quality due to mix of building styles.
Eastcote Village	Landscape and Townscape quality, due to high quality architecture mixed with open green space.
Pinner Road	Townscape quality, due to high quality architecture.
West Drive and Bellfield Avenue	Townscape quality, due to high quality architecture mixed with open green space.

Source: London Borough of Harrow Council- Conservation Areas

A number of Conservation Area character statements highlight that pressure for new development has historically had a negative impact on some of the Borough’s archaeological or cultural heritage. In particular, it is noted that some modern and suburban homes and economic development built close to traditional properties has affected local character. The protection of the Borough’s cultural heritage remains a significant issue for many local residents, businesses and community groups.

Key areas of landscape within Harrow including Green Belt, Metropolitan Open Space, Conservation Areas and Areas of Archaeological Priority can be seen in Figure 14.1.

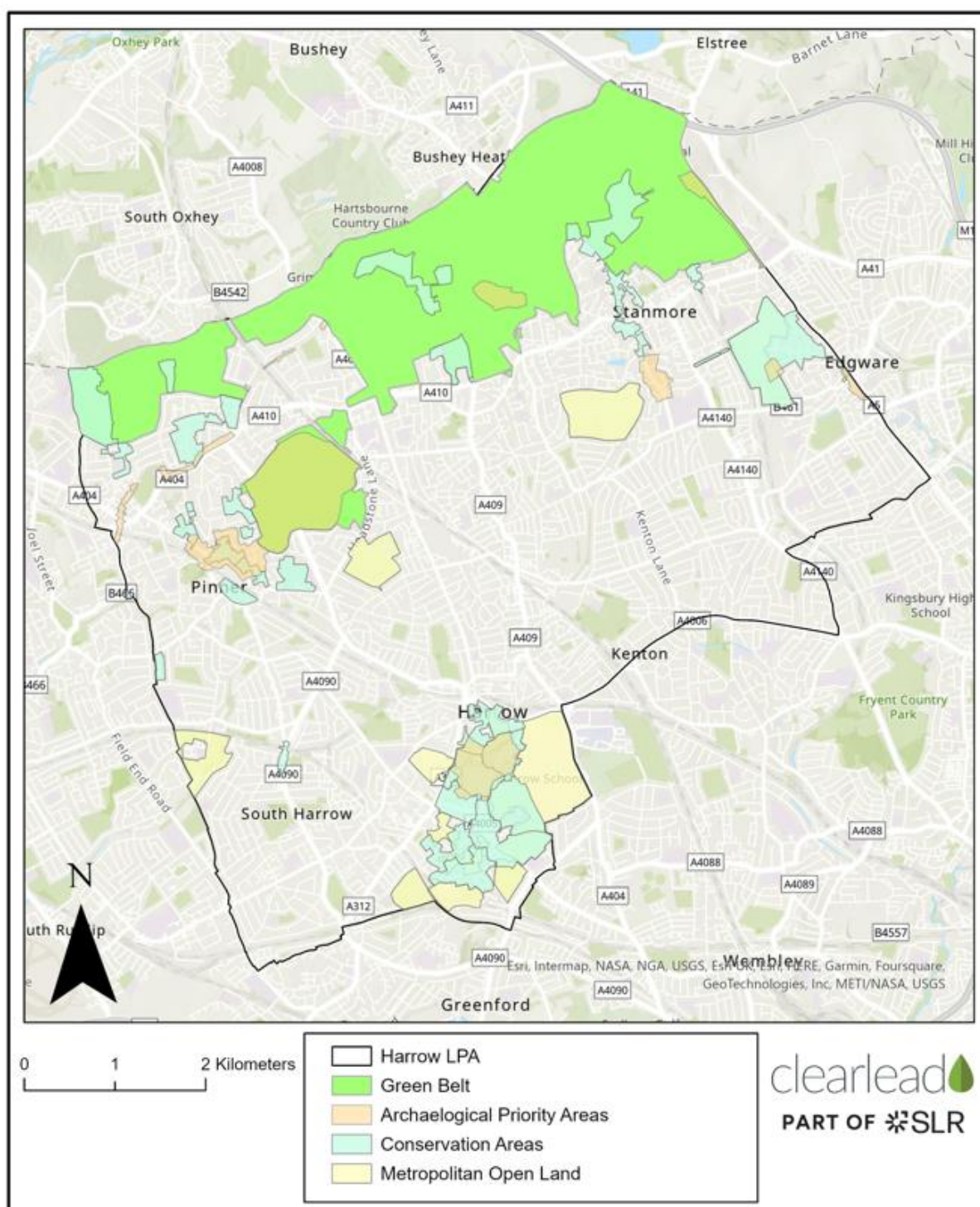


Figure 14.1: Key areas landscape and townscape features in Harrow

## 14.2 Sustainability Issues

- 21.5% of the Borough is protected as Green Belt. If not managed correctly, the pressure of housing and transport development, as well as waste disposal and mineral extraction, may reduce this;

- 6.2% of the Borough is protected as Metropolitan Open Land;
- Development for housing and economic sites are partially restricted due to the presence of Protected Views, and the RAF Northolt Safeguarding Zone;
- Identified landscape character issues within the natural environment of Harrow include a lack of traditional habitat management (for woodlands, grasslands, heathlands and water bodies such as ponds), as well as a lack of public access in many areas. Landscape character issues within the built environmental of Harrow include neglected buildings, lack of security, and visual pollution;
- There are 29 spaces designated as Conservation Areas in Harrow. Conservation Areas have been designated by the Borough Council to protect the character of many settlements and restrict inappropriate development;
- A number of Conservation Area character statements highlight that pressure for new development has historically had a negative impact on some of the Borough's archaeological or cultural heritage. In particular, it is noted that some modern and suburban homes and economic development built close to traditional properties has affected local character; and
- The protection of the Borough's cultural heritage remains a significant issue for many local residents, businesses and community groups.

### **14.3 Likely Evolution without the Local Plan**

The risk of landscape character degradation in parts of the Borough will continue without planning intervention to guide development to address identified issues and reinforce local character.

Continual growth in the Borough and the increasing demand for housing and employment sites, may also mean development could encroach on Green Belt, Metropolitan Open Land, Conservation Areas and could affect unknown archaeology.

### **14.4 Data Gaps**

National Character Area (NCA) Assessment for the Northern Thames Basin was published in 2003. Although updated and republished by Natural England in 2014, relevant data may be missing due to the irregular updating.



‘Soilscape’ data held by National Soil Resources Institute (NSRI) shows that the soil in Harrow Borough is comprised of entirely “slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils”<sup>201</sup>.

Land contamination is principally a legacy of historical industrial activities and past waste disposal practices. Examples of such industries include gas works, chemical works, landfill sites, sewage works, petrol stations and scrap yards. In some instances, substances and waste materials from these activities may have caused pollution to the ground. This contamination has the potential to cause harm to human health, ground and surface waters, ecological systems and the built environment. Land contamination can also include areas of land with elevated levels of naturally occurring substances or where substances are present as a result of accidents, spillages, aerial deposition or migration. In April 2000 the Government introduced new legislation (Part 2A of the Environmental Protection Act 1990) requiring all local authorities to inspect their areas for potentially contaminated land and, if necessary, to ensure that any contamination is ‘cleaned up’ (remediated).

Land uses that are considered sensitive to contamination include:

- All residential development;
- Allotments;
- Schools;
- Nurseries;
- Playgrounds; and
- Hospitals.

Within Harrow, there is one site on the Contaminated Land Register. However, this site is currently being redeveloped..

## **Water**

Harrow falls within the Thames River Basin District. The water supply service is provided by Affinity Water, and sewerage service is provided by Thames Water. On average, Harrow residents consume 170 litres of water per person per day. This is higher than the London average of 149 litres, and the UK average of 142 litres. The London Plan (2021) highlights that developments should achieve a London-wide target of 105 litres or less per head per day in relation to mains water consumption<sup>202</sup>.

Harrow is located within three river catchments, the River Crane, the River Colne, and the River Brent. Table 16.1 shows the water quality status of these water bodies.

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<sup>201</sup> Soilscales Map [Soilscales soil types viewer - Cranfield Environment Centre. Cranfield University](https://landis.org.uk/soilscales-soil-types-viewer/) (landis.org.uk) (Accessed 13/07/23)

<sup>202</sup> The London Plan (2021) [the\\_london\\_plan\\_2021.pdf](#) (Accessed 27/07/23)



<b>Table 15.1 Water Quality (2019)<sup>203</sup></b>			
<b>Waterbody Name</b>	<b>Ecological Status</b>	<b>Chemical Status</b>	<b>Overall Status</b>
River Crane (fed into by Yeading Brook Water Body)	Moderate	Fail	Moderate
River Brent (fed into by Lower Brent Water Body, Silk Stream and Edgware Brook Water Body, Wealdstone Brook Water Body)	Moderate	Fail	Moderate
River Colne (fed into by the River Pinn)	Moderate	Fail	Moderate

Source: DEFRA 2019- Crane Water Body

The classification status of all water bodies has been used to derive a relative understanding of quality to assess the combined potential impact of growth in the region. None of the waterbodies are currently achieving ‘good’ overall status, and all waterbodies received an overall ‘fail’ with regard to their chemical status and a moderate ecological status. All assessments of chemical status conducted by the Environment Agency (2019) have documented failures due to a change in monitoring, where four groups of global pollutants are now being assessed for the first time. The four groups of global pollutants (uPBTs) are: polybrominated diphenyl ethers (PBDEs - a group of brominated flame retardants); Mercury; certain Polycyclic aromatic hydrocarbons (PAHs) and Perfluorooctane sulfonate (PFOS) a group of per-and polyfluoroalkyl substances (PFAS).

The River Crane Environmental Report acknowledges that upstream tributaries found in Harrow have the poorest water quality. This is mostly a result of sewage pollution, of misconnections and sewer overflows. Misconnections occur due to a pipe intended for one type of effluent conveyance being connected to the wrong sewer system. It is estimated that London has an average misconnection rate of 3%. Thames Water and the Crane Valley Partnership are in the early stages of their Smarter Water Catchment Programme, which aims to tackle these water quality issues and improve the condition of the River Crane’s associated waterbodies.<sup>204</sup>

A portion of the Borough is underlain by a Secondary Aquifer. Secondary aquifers support water supplies at a local rather than strategic scale (such as for private supplies) and remain important for rivers, wetlands and lakes. They have a wide range of water permeability and storage. The majority of the Borough is located within an Unproductive Groundwater Vulnerability Zone, meaning that it is not likely

<sup>203</sup> Crane Catchment Data Explorer. [Crane | Catchment Data Explorer | Catchment Data Explorer](#) (Accessed 13/07/2023)

<sup>204</sup> River Crane State of the Environment Report (2022) [State-of-the-Environment-Report-River-Crane-Smarter-Water-Catchment-October-2022.pdf \(cranevalley.org.uk\)](#) [river-crane-smarter-water-catchment-plan.pdf \(thameswater.co.uk\)](#) (Accessed 13/07/2023)

to present a risk to groundwater due to the low permeability of deposits and the protection which they provide to any aquifers that may be present beneath.

### **Minerals**

The London Borough of Harrow does not contain any nationally important mineral resources. There are also no Mineral Safeguarding Areas, and no extraction takes place within Harrow. To the Northeast of the Borough there is a small area of river terrace deposits. There is also a very small area of sub-alluvial interferred resources to the West of the Borough in the suburb of Pinner.<sup>205</sup>

## **15.2 Sustainability Issues**

The following sustainability issues have been identified:

- None of the waterbodies within the Borough are currently achieving ‘good’ overall status, and all waterbodies received an overall ‘fail’ with regard to their chemical status and a moderate ecological status and there is a need to improve water quality;
- Changes to population will put additional strain on already stressed water resources and waste treatment centres. Residents currently use more water per day than the London average;
- New development should incorporate measures to ensure that water is used efficiently, to help reduce the water demand of the Borough particularly in light of future climate change;
- There is a need to consider the effect of development on groundwater supplies both now and in the future;
- There are only small areas of poor agricultural land in the Borough; and
- SUDs can promote infiltration of surface water into the ground and recharge aquifers and can therefore play a long-term role in safeguarding and sustaining water resources.

## **15.3 Likely Evolution without the Local Plan**

Population increase may drive further water demand in the Borough, placing increasing strain on water resources and wastewater treatment. Waterbodies within the Borough will continue to fail good status targets.

## **15.4 Data Gaps**

There are likely to be a number of contaminated sites within the Borough, however there is no existing data on this. There are no plans to carry out a Borough wide investigation into this. Potential land contamination will be investigated at the application stage of development.

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<sup>205</sup> Mineral Resources Map for Hertfordshire and NW London. [Mineral Resources map for Hertfordshire \(bgs.ac.uk\)](https://bgs.ac.uk) (Accessed 13/07/2023)

## 16.0 Waste

### 16.1 Baseline

London's waste stream is made up of a variety of materials, including common dry recyclables (54%), food and green garden waste (23%), and materials (23%) including textiles, electricals and cleaning chemicals<sup>206</sup>.

The West London Waste Authority is the statutory body responsible for waste disposal in Harrow. Harrow utilises landfill, incineration, composting, and recycling as methods of waste disposal. Waste that cannot be recycling or composted is incinerated at Energy Recovery Facilities which provides energy for the National Grid<sup>207</sup>. In line with the Environment Act 2021, household waste in the Borough must be collected separately from recycling.

In respect of recycling performance, the percentage of household waste sent for reuse, recycling, or composting (2021-2022) in Harrow stood at 35.7%, as shown in Table 16.1. This ranks Harrow Borough at 251/333 English Authorities. Recycling rates are similar to those in neighbouring Brent Borough (37.85), however rates are much higher in Ealing Borough (47.6%).

Table 16.1: Recycling Rates for Local Authorities between April 2021 and March 2022 <sup>208</sup>					
	Harrow Borough Council	Brent Borough Council	Barnet Borough Council	Ealing Borough Council	Hillingdon Borough Council
% of household waste recycled or reused or composted	35.7%	37.8%	29.8%	47.6%	38.2%
Collected waste per person (kg)	348.3	264.7	370.2	240.2	354.1
Position in local authority national tables	251	223	298	99	219

Source: DEFRA 2022- Annual Recycling League Table

<sup>206</sup> London Environment Strategy (2018) [London Environment Strategy](#) (Accessed 17/07/23)

<sup>207</sup> Harrow Annual Monitoring Report [authority-s-monitoring-report-amr-2017-18-2018-19 \(harrow.gov.uk\)](#) (Accessed 30/08/23)

<sup>208</sup> Recycling Rates for Local Authorities. [2021/22 overall performance - letsrecycle.com](#) (Accessed 06/07/23)

The London Plan (2021) predicts that by 2041 the Borough will be producing 205,000 tonnes of household, commercial and industrial waste annually<sup>209</sup>. However, Harrow Council are aiming to achieving zero growth in the amount of waste produced by each household each year by 2026, as well as reach 65% recycling rates by 2030<sup>210</sup>. The London Plan (2021) aims to have no recyclable waste entering landfill by 2026, in a bid to support the city's circular economy. The implications of this on developments are ensuring that there is adequate space for waste separation in new developments, as well as repurposing buildings or recycling demolition waste.

Harrow has an existing household waste disposal site 2.31 ha in size. The safeguarded waste site (Council Depot, Forward Drive) is located next to residential dwellings, religious and education facilities, and a train line<sup>211</sup>; this may make it difficult to expand the site if needed.

## 16.2 Sustainability Issues

The following sustainability issues have been identified:

- There is a need to follow the waste hierarchy
- Recycling and household waste in the Borough must be collected separately.
- 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.
- There is a safeguarded household waste disposal site within the Borough, located next to residential dwellings, religious and education facilities, and a train line<sup>212</sup>; this may make it difficult to expand the site if needed.
- In order to support the circular economy targets in the London Plan (2021) new developments need to ensure that there is adequate space for waste separation.
- To support the waste hierarchy, buildings should be repurposed and demolition waste should be recycled where possible.

## 16.3 Likely Evolution without the Local Plan

With an increasing population within the Borough, it is likely that the amount of waste produced will continue to rise. Offering more versatility with recycling, such as the introduction of food waste bins, would help to reduce the amount of waste going to landfill. Development within the Borough could produce construction waste.

## 16.4 Data Gaps

No data gaps have been identified.

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<sup>209</sup> The London Plan 2021. [the\\_london\\_plan\\_2021.pdf](#) (Accessed 14/07/23)

<sup>210</sup> Harrow Waste Management Strategy (2016-2026) [High Level Implementation Plan \(harrow.gov.uk\)](#)

<sup>211</sup> West London Waste Plan [West London Waste Plan \(brent.gov.uk\)](#) (Accessed 17/07/23)

<sup>212</sup> West London Waste Plan [West London Waste Plan \(brent.gov.uk\)](#) (Accessed 17/07/23)

## 17.0 The Proposed IIA Framework

This chapter presents the proposed IIA Framework (Table 17.2) containing IIA Objectives and Sub-objectives. The Local Plan and its alternatives will be tested against the IIA Objectives. The Sub-objectives will be used to help guide the assessment of the plan and its alternatives but may not be applicable in all circumstances. Baseline data evidence will also be referred to when using the IIA Framework to assess the Local Plan and its alternatives.

The structure of the IIA Framework has been drawn from the consultants' experience of developing assessment frameworks. The IIA Objectives and Sub-objectives have been developed to address the key messages from the PPP review and the Sustainability Issues, as demonstrated within Appendix C.

The IIA is an assessment which integrates Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulations Assessment (HRA) screening. As such, the IIA framework needs to ensure that each assessment is adequately addressed, by including objectives and sub-objectives relevant to each assessment. In order to demonstrate this, Table 17.1 identifies the priority IIA Objectives for each of the assessments integrated into the IIA. Indirect effects and interactions between IIA Objectives may also exist.



**TABLE C.1: PRIORITY IIA OBJECTIVES FOR EACH CONSTITUENT ASSESSMENT**

IIA Objective	EQIA	HIA	HRA	SEA	SA
<b>IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses</b>	✓				✓
<b>IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough</b>	✓	✓			✓
<b>IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities and recreational resources (including open spaces and sports facilities)</b>	✓	✓		✓	✓
<b>IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life</b>	✓	✓		✓	✓
<b>IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups</b>	✓	✓		✓	✓
<b>IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage</b>	✓	✓		✓	✓
<b>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</b>	✓	✓		✓	✓
<b>IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases</b>		✓		✓	✓



**TABLE C.1: PRIORITY IIA OBJECTIVES FOR EACH CONSTITUENT ASSESSMENT**

IIA Objective	EQIA	HIA	HRA	SEA	SA
<b>IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</b>		✓		✓	✓
<b>IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats</b>			✓	✓	✓
<b>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</b>				✓	✓
<b>IIA12 Landscape and Townscape: To conserve and enhance the borough’s landscape and townscape character</b>				✓	✓
<b>IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</b>		✓		✓	✓
<b>IIA14 Waste: To minimise waste</b>					✓



**Table 17.2: Proposed IIA Framework**

IIA Topic	Proposed IIA Objective	Proposed IIA Sub-objective
Economy and Employment	<b>IIA1 Economy:</b> <b>To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses</b>	<ul style="list-style-type: none"> <li>• Encourage the creation of new businesses and business innovation</li> <li>• Support existing businesses to grow</li> <li>• Support new businesses to locate within the area and diversify the local economy</li> <li>• Encourage the growth of the local economy by enabling good quality economic developments, with world class infrastructure and connectivity</li> <li>• Support flexible working practices</li> <li>• Protection and retention of adequate supply of employment floor space to address business needs</li> <li>• Enhance the vitality and viability of Town centres, by retaining and providing additional floor space for town centre uses</li> <li>• Safeguard existing town centres</li> <li>• Maintain a range of uses in town centres including retail and employment</li> <li>• Improve existing shopping facilities within town centres and neighbourhood parades</li> <li>• Support the redevelopment/intensification of existing employment land to provide additional and high-quality floor space, as well as the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area</li> </ul>
	<b>IIA2 Employment:</b> <b>To create greater employment opportunities and higher value jobs for all ages across the whole borough</b>	<ul style="list-style-type: none"> <li>• Create new jobs in high value sectors</li> <li>• Encourage developers to demonstrate how they are investing in skills and employing local people</li> </ul>





**Table 17.2: Proposed IIA Framework**

<b>Table 17.2: Proposed IIA Framework</b>		
Population and Equalities	<b>IIA3 Accessibility:            To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)</b>	<ul style="list-style-type: none"> <li>• Ensure all residents have equitable access to local services and facilities including (taking into account the needs of an aging population):               <ul style="list-style-type: none"> <li>○ Education facilities</li> <li>○ Recreation facilities</li> <li>○ Health services</li> </ul> </li> <li>• Increase the delivery of new or enhanced community and health facilities</li> <li>• Ensure local facilities have capacity to accommodate proposed development</li> <li>• Increase education facility provision for children with learning disabilities</li> <li>• Ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity</li> <li>• Help ensure all children have access to a local school within reasonable walking distance</li> <li>• Ensure the option / policy does not have an adverse/discriminatory impact on protected characteristics/equality groups</li> <li>• Ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled elderly, families with children</li> </ul>
Health	<b>IIA4 Health and Wellbeing:            Enable residents to lead a healthy, good quality life</b>	<ul style="list-style-type: none"> <li>• Use design to create safe and attractive neighbourhoods which contribute towards quality of life and community cohesion</li> <li>• Increase and improve opportunities for active travel including walking and cycling</li> <li>• Ensure everyone has access to places to mix and meet such as community facilities (e.g.: community halls and places of worship) and recreation facilities</li> <li>• Increase and improve provision of open space and informal and formal recreation (e.g.: swimming pool, sports centre) facilities</li> <li>• Ensure everyone has access to open space to promote healthy lifestyles</li> <li>• Increase provision of private amenity space</li> <li>• Encourage the protection of allotments and encourage the delivery of new spaces to grow food</li> </ul>



**Table 17.2: Proposed IIA Framework**

Housing	<p><b>IIA5 Housing:</b>  <b>To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups</b></p>	<ul style="list-style-type: none"> <li>• Increase the number of additional homes delivered to meet local needs/targets</li> <li>• Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)</li> <li>• Provide affordable homes of the tenure and size to meet the identified needs</li> <li>• Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)</li> <li>• Increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children</li> <li>• Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites</li> </ul>
Transport and Accessibility	<p><b>IIA6 Sustainable Travel:</b>  <b>To reduce the need to travel by private car and promote sustainable travel habits including walking, cycling and public transport usage</b></p>	<ul style="list-style-type: none"> <li>• Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport</li> <li>• Encourage intensification in existing residential areas in the most accessible locations within the Borough</li> <li>• Improve the existing cycling and walking network and provide new routes</li> <li>• Increase and improve opportunities to access public transport including where there are existing issues (such as steps)</li> <li>• Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure</li> </ul>
Air, Noise & Light	<p><b>IIA7 Air, Light and Noise Pollution:</b>  <b>To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions</b></p>	<ul style="list-style-type: none"> <li>• Ensure new and existing communities are not adversely affected by poor quality air and noise pollution, either through their location or through causing a further deterioration as a result of new development</li> <li>• Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security</li> </ul>



**Table 17.2: Proposed IIA Framework**

Climatic Factors	<p><b>IIA8 Minimising Contributions to Climate Change:</b>  <b>To reduce the borough’s contribution towards the emission of climate change gases</b></p>	<ul style="list-style-type: none"> <li>• Support the delivery of renewable and low-carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)</li> <li>• Support the shift towards usage of electric and ultralow emissions vehicles</li> <li>• Promote a low carbon local economy</li> <li>• Ensure new developments are energy efficient</li> <li>• Minimise greenhouse gas emissions</li> </ul>
	<p><b>IIA9 Adaptation to Climate Change:</b>  <b>Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</b></p>	<ul style="list-style-type: none"> <li>• Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage</li> <li>• Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity</li> <li>• Encourage the development of new green infrastructure which creates a connected network across the Borough and within the wider area</li> </ul>
Biodiversity, Geodiversity, Flora & Fauna	<p><b>IIA10 Biodiversity:</b>  <b>To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats</b></p>	<ul style="list-style-type: none"> <li>• Avoid adverse effects on European designated habitats sites</li> <li>• Conserve and enhance nationally and locally designated wildlife sites</li> <li>• Conserve and enhance natural and semi natural habitats</li> <li>• Contribute to the delivery of new or safeguard existing BAP priority species and habitats</li> <li>• Achieve BNG in new developments</li> <li>• Contribute to creating a network of new wildlife habitats</li> <li>• Provide new or improved access to greenspaces</li> <li>• Protect sites of geological importance</li> </ul>



**Table 17.2: Proposed IIA Framework**

Cultural Heritage	<b>IIA11 Historic Environment:</b> <b>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</b>	<ul style="list-style-type: none"> <li>• Protect and enhance heritage assets, cultural and archaeological assets and features, and their settings</li> </ul>
Landscape and Townscape	<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough’s landscape and townscape character</b>	<ul style="list-style-type: none"> <li>• Respect and protect existing landscape and townscape character</li> <li>• Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact</li> <li>• Protect sensitive areas and protected views</li> <li>• Safeguard landscape and townscape features such as trees</li> <li>• Encourage well-designed developments which enhance local character</li> </ul>
Soils, Water & Minerals	<b>IIA13 Soils and Water:</b> <b>To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</b>	<ul style="list-style-type: none"> <li>• Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored</li> <li>• Avoid development of greenfield land</li> <li>• Promote the efficient use of minerals</li> <li>• Protect soil quality and avoid soil pollution</li> <li>• Ensure surface and groundwater water resources are used efficiently and protected from pollution</li> </ul>



**Table 17.2: Proposed IIA Framework**

Waste	<b>IIA14 Waste: To minimise waste</b>	<ul style="list-style-type: none"><li>• Encourage new developments to provide adequate space for waste separation</li><li>• Encourage the repurposing and refurbishing of buildings, instead of demolition</li><li>• Safeguard existing waste management sites</li><li>• Where demolition needs to occur, ensure waste is recycled (preferably on site)</li></ul>
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## **18.0 Next Steps**

This Scoping Report will be consulted on for a period of 5 weeks with statutory consultees and other key stakeholders.

Following receipt of consultation comments, these will be reviewed and any recommended changes made to the information presented in this report and the proposed IIA Framework.

The IIA Framework will then be used to test the Regulation 18 draft of the Local Plan and its alternatives. An Interim IIA Report will be prepared to accompany consultation on the Regulation 18 draft of the Local Plan later in 2023.



