



LONDON BOROUGH OF  
**HARROW**

**London Borough of Harrow Council**  
**IIA Report**  
**Appendix D: Assessment of Pre-Submission Local Plan Policies**

Prepared by:  
**SLR Consulting Ltd**

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VERSION CONTROL RECORD				
Issue	Description of Status	Date	Reviewer Initials	Authors' Initials
1	Draft	10/10/2024	JM/VP	LJ/KW/IT
2	Final for consultation	28/10/2024	JM/VP	LJ/KW/IT

The methodology used for the assessment of all policies is outlined below, with an explanation given under each header. The same assessment matrices has been used for the assessment of all policies, hence all follow the same format.

Policy/Alternative name	
Chapter	
Policy/alternative description	
Assumptions Made	

IIA framework			Assessment								
IIA Objective	Assessment Questions	Assessment Questions Screening	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation
IIA objectives will be listed here	All questions relating to the SA objective in column A will be outlined here.	This indicates if assessors were able to consider the assessment question as part of their assessment.	Details on the nature of any potential effects will be listed here. For further details and definitions of each category, please see the 'Significance Scores' tab. For cases where a neutral effect has been identified, N/A will be present across columns H-L.				A significance score will be selected here, which corresponds with the definitions detailed in the 'Significance Scores' tab.	The potential effect identified in columns H-M will be detailed here, with justification for the significance score. Any information considered as a part of the assessments which has informed these potential effects will also be detailed here.	Yes or No will be inserted here. If yes, see summary box at the bottom of the matrices for further details of the potential cumulative effect.	Any mitigation required for potential negative or uncertain effects will be detailed here. If the sole method of preventing a potential adverse effect is to not develop a site, "No mitigation identified." will be written here.	

**Significant Negative and Uncertain Effects**

All potential significant negative and uncertain effects outlined in the assessment above, will be accumulated into this box.

**Significant Positive Effects**

Any potential significant positive effects identified within the assessment will be detailed here.

**Potential Cumulative Effects Identified**

Details of any potential cumulative effects, including which SA objectives could be affected, will be outlined here. This could include specific cumulative effects with another site, or those which could arise as a result of all development across the borough.

**Mitigation and enhancements**

Details of all mitigation listed in column P and any potential enhancements arising from assessment will be summarised against the relevant assessment here. All potential significant negative and uncertain effects will have mitigation listed.

Nature of effects	
Criterion	Description
<b>Significance</b>	An assessment of the significance of the potential effects identified. This could be a positive effect, negative effect, neutral effect, significant positive effect or significant negative effect. The definitions for these effects are detailed to the right.
<b>Permanent/temporary</b>	An assessment of whether the predicted effects would be permanent (P), or temporary (T).
<b>Reversible/Irreversible</b>	An assessment of whether or not the identified effect can be reversed (R) e.g. the loss of greenfield land to development would be irreversible (I).
<b>Spatial extent</b>	How far the effect is predicted to be spread geographically: Low (L) = A specific area within Harrow boundary Medium (M) = Across the entire Harrow boundary, possibly reaching to neighbouring boroughs High (H) = Beyond the Harrow Local Plan Boundary, with national or international ramifications
<b>Magnitude</b>	An assessment of the proportion of the receptor affected by the identified effect. Low (L) = 20-40% of receptor or capacity affected Medium (M) = 40-80% of receptor affected High (H) = 80+% of the receptor affected
<b>Duration</b>	An assessment of the time period the predicted effects are likely to last. This could be: Short (S) = 0-5 years Medium (M) = 5-10 years Long (L) = 10 years or more, up to the end of the Local Plan period
<b>Direct/Indirect</b>	An assessment of whether the predicted effect will be directly (D) as a result of option implementation, or indirectly (I) caused by the policy option.
<b>Likelihood</b>	An assessment of how likely it is that the implementation of the policy option will lead to the predicted effect. This could be low (L), moderate (M) or high (H).
<b>Cumulative effect</b>	An assessment of whether or not there is potential for a cumulative effect to occur on the IIA objective as a result of the policy option working in combination with other circumstances, policies or factors. Y= potential cumulative effect. No potential cumulative effect identified.

Significance Scores		
Symbol	Definitions of Significance of Effects Against the IIA Objectives	Assumptions on the nature of effects
++	<b>Significant Positive Effect:</b> the policy option supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: •enhance and redefine the location in a positive manner, making a contribution at a national or international scale; •repair or restore receptors badly damaged or degraded through previous uses; and/or •improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	<b>Minor Positive Effect:</b> the policy option supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: •improve undesignated yet recognised receptor qualities at the neighbourhood scale; •fit into or with the existing location and existing receptor qualities; and/or •enable the restoration of valued characteristic features partially lost through other land uses.
0	<b>Neutral Effect:</b> the policy option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to determine the assessment this stage	N/A
-	<b>Minor Negative Effect:</b> the policy option appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: •be out of scale with the location; or •leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	<b>Significant Negative Effect:</b> the policy option works against the achievement of this objective; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: •permanently degrade, diminish or destroy the integrity of the receptor; •cause a very high quality receptor to be permanently changed and its quality diminished; •cannot be fully mitigated and may cumulatively amount to a severe adverse effect; •be at a considerable variance to the location, degrading the integrity of the receptor; and/or •will be substantially damaging to a high quality receptor such as a specific regional or national designation.

Policy name	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Spatial_Strategy	++	+	+	+	++	++	+	+	0	+	+	+	+	0
Strategic_Policy_01	++	0	++	+	0	+	0	0	0	0	+	++	0	0
GR1_Development_Standard	0	0	+	+	0	0	++	+	+	+	+	+	+	+
GR2_Inclusive_Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0
GR3_Connecting_Places	0	0	+	+	0	+	+	+	+	+	+	+	0	0
GR3A_Inclusive_Design	0	0	++	+	+	+	0	0	0	0	+	0	0	0
GR3B_Safety_Security	0	0	0	+	0	0	0	0	0	0	0	0	0	0
GR4_Building_Heights	+	0	0	+	+	0	+	0	0	0	+	++	0	0
GR4A_Basement_Development	0	0	0	+	+	0	0	0	+	+	0	0	+	0
GR5_View_Management	0	0	+	0	0	0	0	0	0	0	+	++	0	0
GR6_Areas_of_Special_Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
GR7_External_Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0
GR8_Shopfronts_and_Forecourts	+	0	+	+	0	0	0	0	0	0	+	+	0	0
GR9_Advertisements_and_Displays	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10_Gardens_and_Amenity_Areas	0	0	+	+	+	+	0	0	0	+	0	+	0	+
GR11_Planning_Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0
GR12_Site_Allocations	0	0	+	0	++	+	0	0	0	0	0	+	0	0
Strategic_Policy_02	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1_Historic_Environment	+	0	0	0	0	0	0	0	0	+	++	++	0	0
HE2_Enabling_Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0
Strategic_Policy_03	+	0	+	+	++	+	-	0	0	0	0	-	+	0
HO1_Dwelling_Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
HO2_Conversion_Redevelopment	0	0	+	+	++	+	+	+	0	0	+	+	+	+
HO3_Small_Sites	0	0	+	+	+	+	0	+	0	+	0	+	0	0
HO4_Affordable_Housing	0	+	0	0	++	0	0	0	0	0	0	0	+	0
HO5_Housing_Estates	0	0	0	++	++	++	0	+	0	0	0	+	+	0
HO6_Accommodation_Older_People	0	0	++	+	++	+	0	+	0	0	0	0	0	0
HO7_Supported_Accommodation	0	0	++	+	+	+	0	0	0	0	0	0	+	0
HO8_Student_Accommodation	+	0	+	+	+	+	0	0	0	0	0	0	0	0
Large_Scale_Shared_Living	+	+	+	+	+	+	0	+	0	0	0	+	0	+
Housing_Shared_Facilities	0	0	+	+	++	+	0	+	+	+	0	+	0	+
HO11_Self_and_Custom_Build	0	0	+	0	+	0	0	0	0	0	0	0	0	0
HO12_Gypsy_and_Traveller_Needs	0	0	+	+	+	+	0	0	+	+	0	+	+	+
Strategic_Policy_04	++	++	0	0	?	0	0	0	0	0	0	0	0	0
Strategic_Policy_05	++	+	+	+	+	++	0	+	+	+	+	+	0	0
LE1_Development_Principles	++	+	+	+	0	+	+	0	0	0	0	+	0	+
LE2_Nighttime_Evening_Economy	++	+	+	0	0	0	+	0	0	0	0	0	0	0
LE3_Industrial_Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+
LE4_Culture_Creative_Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5_Tourism_and_Accommodation	++	+	+	+	+	+	+	0	0	0	+	+	0	+
Strategic_Policy_06	+	+	+	+	0	0	0	0	+	+	0	0	0	0
C11_Safeguarding_Infrastructure	+	+	+	++	0	+	+	0	0	0	0	0	0	+
C12_Play_and_Informal_Leisure	0	0	+	++	0	0	0	0	+	+	0	0	0	0
C13_Sport_and_Recreation	+	+	+	++	0	+	+	0	0	+	+	+	+	0
C14_Comms_Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0
Strategic_Policy_07	0	0	0	+	0	0	+	0	+	+	+	+	+	0
GI1_Green_Belt_and_MOL	0	0	0	+	0	0	0	0	0	+	+	+	+	0
GI2_Open_Space	0	0	+	+	0	0	0	0	+	+	0	0	0	0
GI3_Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
GI4_Greening_Landscaping_Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
GI5_Food_Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0
Strategic_Policy_08	0	+	0	+	0	++	+	++	+	+	0	0	+	+
CN1_Design_and_Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
CN2_Energy_Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0
CN3_Flood_Risk	+	0	0	+	0	0	0	0	++	+	0	0	+	0
CN4_Drainage	+	0	0	+	0	0	0	0	++	+	0	0	++	0
CN5_Waterway_Management	0	+	0	0	0	0	0	0	+	+	0	0	+	0
Strategic_Policy_09	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1_Reducing_and_Managing_Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++
CE2_Circular_Economy	0	0	0	0	0	0	0	0	0	0	0	0	0	++
Strategic_Policy_10	+	0	+	+	0	++	+	+	0	0	0	0	0	0
M1_Sustainable_Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2_Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0
M3_Deliveries_and_Construction	0	0	0	+	0	+	+	+	0	0	0	0	0	0

Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	--

Policy/Alternative name	Spatial Strategy
Chapter	Chapter 01: Spatial Vision and Objectives
Policy/alternative description	This policy outlines the spatial strategy of Harrow Borough over the Local Plan period. It outlines the overarching spatial goals of the Council, to improve economic, housing, health and character outcomes.
Assumptions Made	This policy builds on the previous spatial strategy, included in the previous Local Plan.

IIA objective	IIA framework		Assessment									
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancements
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Significant Positive	The strategy contributes to the achievement of objective IIA1 as it aims to direct flexible employment and industrial land to appropriate locations, to meet current and future needs. The strategy aims to provide a minimum of 13,900sqm of retail, food / beverage, leisure and entertainment floorspace and 6000sqm of industrial floorspace. Town centres will be safeguarded and improved to increase retail expenditure and secure the vitality and viability of the town centre network (e.g.: Pinner High Street, Stanmore Town Centre, Harrow Town Centre and North Harrow District Centre). These areas will be redeveloped and improved to provide retail, leisure (including arts and cultural), office and residential uses. Developments should be adaptable however in order to ensure vibrancy. Therefore, a potential significant positive effect is recorded.	Yes		
	Support the provision of world class infrastructure and connectivity?	Yes										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes										
	Safeguard existing town centres?	Yes										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes										
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes										
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The strategy contributes to the achievement of objective IIA2 as a focus is placed on the development and intensification of employment and industrial land across the Borough will create new employment opportunities for residents. The intensification and redevelopment of employment land and industrial estates in the Wealdstone and Harrow Opportunity Area should lead to the provision of 1000 additional jobs. Therefore, a potential minor positive effect is recorded.	Yes		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The strategy contributes to the achievement of objective IIA3 as a focus is placed on ensuring high-quality services and facilities are accessible to all. Therefore, a potential minor positive effect is recorded.	Yes		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes										
	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?	Yes										
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The strategy contributes to the achievement of objective IIA4 as a focus is placed on ensuring high-quality services and facilities are accessible to all. The provision of children's and teenagers' accessible recreation and play space, as well as access to natural green space for residents and visitors is also considered. Therefore, a potential minor positive effect is recorded.	Yes		
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Temporary/Irreversible	Significant Positive	The strategy contributes to the achievement of objective IIA5 as it aims to provide a minimum of 16,040 (net) homes during the Plan period (2021 – 2041), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (Policy H1, London Plan). These additional homes should be developed to suit a range of residents. Within the Harrow and Wealdstone Opportunity Area, around 8,750 additional homes are to be delivered. 'Metroland' areas will be safeguarded for family housing. Therefore, a potential significant positive effect is recorded.	Yes		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	No										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Long (20+ yrs)	Regional	Permanent/Irreversible	Significant Positive	The strategy contributes to the achievement of objective IIA6 as it aims to improve connectivity across the Borough through sustainable transport linkages. Development will be supported in areas most accessible to public transport, such as train and underground stations. The strategy aims to work with neighbouring Boroughs to improve connectivity between Kenton Station and Northwick Park Station. Accessibility will be improved at Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station, with step free access. Finally, improvements will be made to the walking network and pedestrian connectivity, particularly between Harrow Town Centre and Harrow on the Hill. Therefore, a potential significant positive effect is recorded.	Yes		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	Yes										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes										
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The strategy contributes to the achievement of objective IIA7 as a focus on the carbon neutral design of new development and active methods of travel will minimise air pollution across the Borough. Therefore, an indirect potential minor positive effect is recorded.	Yes		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The strategy contributes to the achievement of objective IIA8 as a focus on carbon neutrality design will promote low carbon, energy efficient developments that minimise greenhouse gas emissions. Therefore, a potential minor positive effect is recorded.	Yes		
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No										
	Promote a low carbon local economy?	Yes										
	Ensure new developments are energy efficient?	Yes										
	Minimise greenhouse gas emissions?	Yes										
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
<b>IIA10 Biodiversity:</b>	Avoid adverse effects on European designated habitats sites?	No	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The strategy contributes to the achievement of objective IIA11 as it aims for the Borough's Metropolitan Open Land, Green Belt and other open space to be maintained and enhanced as an	Yes		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes										
	Conserve, enhance and repair natural and semi natural habitats?	Yes										

<p><b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.</p>	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes								<p>Interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will also be enhanced. Therefore, a potential minor positive effect is recorded.</p>			
	<del>Achieve biodiversity net gain (BNG) in new developments?</del>	<del>No</del>											
	Provide new or improved access to greenspaces?	Yes											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes											
	<del>Protect sites of geological importance?</del>	<del>No</del>											
<p><b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</p>	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Minor Positive	<p>The strategy contributes to the achievement of objective IIA11 as it aims for Harrow's identified heritage assets and historic environment to be valued, conserved, enhanced and celebrated. Therefore, a potential minor positive effect is recorded.</p>	Yes			
	Maintain and enhance access to cultural heritage assets?	Yes											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes											
	<del>Contribute to the better management of heritage assets and contribute to conserving heritage at risk?</del>	<del>No</del>											
	<del>Improve the condition of the historic environment?</del>	<del>No</del>											
<p><b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character</p>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	<p>The strategy contributes to the achievement of objective IIA12 as it aims for all development opportunities to be relevant to their surrounding landscape and townscape character, role, and function. The strategy also aims for the Borough's Metropolitan Open Land, Green Belt and other open space to be maintained through no development. As a result, housing development will be directed to areas that have little/no impact on the character of an area. Therefore, a potential minor positive effect is recorded.</p>	Yes		<p>The text of Spatial Strategy Alternative 1 safeguards suburban areas as areas of low density, family housing in order to protect suburban character, as well as protects the Borough's Metropolitan Open Land, Green Belt and other open space (including gardens) from development. Such details could be added to the preferred policy wording in order for the policy to perform more positively.</p>	
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes											
	<del>Protect sensitive areas and protected views?</del>	<del>No</del>											
	<del>Safeguard landscape and townscape features such as trees?</del>	<del>No</del>											
<p><b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</p>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	Yes	Direct	Low	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	<p>The strategy contributes to the achievement of objective IIA13 as development should be directed to occur on brownfield sites. Therefore, a potential minor positive effect is recorded.</p>	Yes			
	Avoid development of greenfield land?	Yes											
	<del>Promote the efficient use of minerals?</del>	<del>No</del>											
	<del>Protect soil quality and avoid soil pollution?</del>	<del>No</del>											
	<del>Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?</del>	<del>No</del>											
<p><b>IIA14 Waste:</b> To minimise waste.</p>	<del>Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?</del>	<del>No</del>							<p>The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.</p>	No			
	<del>Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?</del>	<del>No</del>											
	<del>Encourage new developments to provide adequate space for waste separation?</del>	<del>No</del>	N/A	N/A	N/A	N/A	N/A	Neutral					
	<del>Encourage the repurposing and refurbishing of buildings, instead of demolition?</del>	<del>No</del>											
	<del>Ensure waste is dealt with in line with circular economy principles?</del>	<del>No</del>											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA1: The strategy contributes to the achievement of objective IIA1 as it aims to direct flexible employment and industrial land to appropriate locations, to meet current and future needs. The strategy aims to provide a minimum of 13,900sqm of retail, food / beverage, leisure and entertainment floorspace and 6000sqm of industrial floorspace. Town centres will be safeguarded and improved to increase retail expenditure and secure the vitality and viability of the town centre network (e.g.: Pinner High Street, Stanmore Town Centre, Harrow Town Centre and North Harrow District Centre). These areas will be redeveloped and improved to provide retail, leisure (including arts and cultural), office and residential uses. Developments should be adaptable however in order to ensure vibrancy. Therefore, a potential significant positive effect is recorded. IIA5: The strategy contributes to the achievement of objective IIA5 as it aims to provide a minimum of 16,040 (net) homes during the Plan period (2021 – 2041), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (Policy H1, London Plan). These additional homes should be developed to suit a range of residents. Within the Harrow and Wealdstone Opportunity Area, around 8,750 additional homes are to be delivered. 'Metroland' areas will be safeguarded for family housing. Therefore, a potential significant positive effect is recorded. IIA6: The strategy contributes to the achievement of objective IIA6 as it aims to improve connectivity across the Borough through sustainable transport linkages. Development will supported in areas most accessible to public transport, such as train and underground stations. The strategy aims to work with neighbouring Boroughs to improve connectivity between Kenton Station and Northwick Park Station. Accessibility will be improved at Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station, with step free access. Finally, improvements will be made to the walking network and pedestrian connectivity, particularly between Harrow Town Centre and Harrow on the Hill. Therefore, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA12: The text of Spatial Strategy Alternative 1 safeguards suburban areas as areas of low density, family housing in order to protect suburban character, as well as protects the Borough's Metropolitan Open Land, Green Belt and other open space (including gardens) from development. Such details could be added to the preferred policy wording in order for the policy to perform more positively.

Policy/Alternative name	Strategic Policy 01: High Quality Growth
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how development in Harrow must be of a high quality to ensure proposals relate well to the existing character of the Borough, whilst being effective for the needs of residents.
Assumptions Made	Development must consider wider policy objectives as set out within the development plan

IIA framework			Assessment														
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	High	Medium/Long	Borough Wide	Permanent/Reversible	Significant Positive	The policy aims for new development and growth to be predominantly directed into the Harrow & Wealdstone Opportunity Area. New development within the Opportunity Area will be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. The Opportunity Area contains two town centres. The design of development and uses in these areas must be appropriate, improving the vitality and vibrancy of the centres and ensuring development remains at a human scale. The policy supports IIA1 and could result in a potential significant positive effect.	Yes							
	Support the provision of world class infrastructure and connectivity?	Yes															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes															
	Safeguard existing town centres?	Yes															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes															
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Reversible	Significant Positive	The policy supports the achievement of objective IIA3 as it highlights a focus on the delivery of essential infrastructure to support new development across Borough. LBHC will work with strategic partners in conjunction with the Infrastructure Delivery Plan to identify essential infrastructure for growth. This will include the provision of education, health and recreational facilities. Therefore, a potential significant positive effect is recorded.	No							
	Increase the delivery of new or enhanced community and health facilities?	Yes															
	Help ensure all children have access to a local school within reasonable walking distance?	Yes															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	Yes															
	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?	Yes															
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Moderate	Medium/Long	Borough Wide	Permanent/Reversible					Minor positive	The policy requires development proposals to demonstrate a level of effective and inclusive public engagement that is representative of the community and commensurate to the scale of development. Supporting text clarifies that major applications should ensure that early and effective engagement has been undertaken with the local community, and demonstrate the level of engagement and how feedback has been positively incorporated into the final submission to the Council. This has potential to support this IIA objective and potential to address three of the assessment questions. The policy highlights that developments should achieve safe and attractive neighbourhoods, and provide access to amenity / open space and sustainable modes of travel. A potential minor positive effect is therefore identified.	No		The policy could perform more positively if it specifically mentioned elements of high quality design such as safe and attractive neighbourhoods, access to amenity/open space, sustainable access for all e.g. by walking and cycling. Reference to consultation could be strengthened by adding reference to encouraging inclusive consultation with representative groups of society.
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		Yes															
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing.		Yes															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		Yes															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Although the policy relates to growth, which will include housing, this is not made specific in the policy and other policies in the plan relate to the quantum and type of housing development to be delivered. Therefore a neutral effect is predicted here.	No						
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Moderate	Medium/Long	Borough Wide	Permanent/Reversible	Minor positive					The policy directs most development to the Harrow & Wealdstone Opportunity Area which is a very accessible part of the Borough. The policy identifies that the Council will support design-led developments which respond positively to the character and context of the location within which they are proposed. This could be inferred to mean in relation to public transport access but this is not made explicit. Additionally, LBHC will work with strategic partners in conjunction with the Infrastructure Delivery Plan to identify essential infrastructure for growth. This will include the provision of highway improvements. Therefore, a potential minor positive effect is identified.	No		The policy could perform more positively if it specifically mentioned encouraging the design of new developments to optimise sustainable accessibility for all e.g. by walking and cycling.
Encourage intensification in existing residential areas in the most accessible locations within the borough?		Yes															
Improve existing cycling and walking network and provide new routes?		No															
Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?		No															
Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?		No															
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		Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the shift towards usage of electric and ultralow emissions vehicles?	No															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	No															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No															
	Conserve, enhance and repair natural and semi-natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No															
	Achieve biodiversity net gain (BNG) in new developments?	No															
	Provide new or improved access to greenspaces?	No															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No															
	Protect sites of geological importance?	No															
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Moderate	Medium/Long	Borough wide	Permanent/Reversible	Minor positive	By following a design-led approach to new development, proposals will make optimal use of land in accordance with the requirements of the development plan. The Council will support contemporary architecture where appropriate, providing it does not harm or detract from an existing context or architectural character. This is particularly important in relation to heritage assets across the borough. The policy addresses some of the assessment questions and supports the IIA objective. A potential minor positive effect should result.	No							
	Maintain and enhance access to cultural heritage assets?	Yes															
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes															
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No															
	Improve the condition of the historic environment?	No															
	Encourage heritage led regeneration?	No															
	Help provide solutions to those assets on the Heritage at Risk register?	No															
IIA12 Visual Quality: To respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	High	Medium/Long	Borough wide	Permanent/Reversible	Significant Positive	The policy requires development to be of a high quality to ensure proposals relate well to the existing character of the Borough. The policy sets out requirements of developers in order to guide and	No							
	Promote high quality and contextually successful design?	Yes															
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes															





Policy/Alternative name	GR1 Achieving a High Standard of Development
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how all development proposals must achieve a high standard of design and layout, that respects the character and context of the locality that it is proposed in.
Assumptions Made	None.

IIA objective	IIA framework				Assessment							Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. The purpose of the policy is not to specifically address the need for flexible working practices within new developments within Harrow Borough, however, there is an opportunity for the policy to include mention of flexible working, home workspace, live/work units. A neutral effect is predicted and a suggested enhancement measure identified.	No		The policy would perform more positively if it referenced provision of home / flexible work space within design of new developments.
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	Yes										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No										
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Moderate	Medium/L ong	Borough wide	Permanent/irreversible	Minor positive	The policy requires proposals to comply with National Prescribed Space Standards & London Plan Minimum Internal Space Standards for New Dwellings. Secure by Design principles should also be considered at an early design stage. Additionally, residential developments and accommodation for elderly people must be designed to include wheelchair and accessible standard housing (in line with Policy D7 of the London Plan, 2021). Non-residential developments must be accessible to all in line with Policy GR2 and GR3. These requirements should help to 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, and families with children. A potential minor positive effect is therefore identified.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes										
	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?	Yes										
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Moderate	Medium/L ong	Borough wide	Permanent/irreversible	Minor positive	The policy requires all development proposals to contribute to healthy places. The policy encourages proposals to consider using Secure by Design principles at an early design stage. It also requires proposals to provide high quality amenity space and play space to support the overall quality of a successful development and protect and enhance the amenity of new and existing residents with regards to daylight, outlook, noise, dust, air quality etc. A potential minor positive effect is therefore identified.	No		The policy could go further to encourage healthy developments to be delivered such as encouraging the incorporation of allotments/food growing, open space / greenspace, and mention connections via sustainable and active modes of transport, particularly in relation to the layout of developments.
	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?	No										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	Yes										
	Ensure all representative groups will be consulted and engaged with?	No										
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No										
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes										
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium/L ong	Borough wide	Permanent/irreversible	Significant positive	The policy requires proposals to ensure amenity for existing and future occupiers would be safeguarded with regards to the impact of the proposed use and activity on noise, vibration, dust, air quality and light pollution on future and existing occupiers. A potential significant positive effect is therefore identified.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/irreversible	Minor Positive	The policy relates to achieving a high standard of development and addresses design and layout and residential amenity. Under design and layout, the policy mentions incorporating sustainability measures and contributing where feasible to the circular economy. It can be inferred that this will be achieved through other Local Plan policies such as CN1 Sustainable Design & Retrofitting and CN2 Energy Infrastructure. A potential minor positive effect is therefore identified.	No		Cross referencing to policy CN1 Sustainable Design & Retrofitting and CN2 Energy Infrastructure could strengthen the policy.
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	Yes										
	Minimise greenhouse gas emissions?	Yes										
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/irreversible	Minor Positive	The policy relates to achieving a high standard of development and addresses design and layout and residential amenity. Under design and layout, the policy mentions incorporating sustainability measures and contributing where feasible to the circular economy. It can be inferred that this will be achieved through other Local Plan policies such as CN1 Sustainable Design & Retrofitting, CN2 Energy Infrastructure and G13 Biodiversity. A potential minor positive effect is therefore identified.	No		Cross referencing to policy CN1 Sustainable Design & Retrofitting, CN2 Energy Infrastructure and G13 Biodiversity could strengthen the policy.
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes										
	Avoid adverse effects on European designated habitats/sites?	No	Direct	High	Medium/L ong	Borough wide	Permanent/irreversible	Minor positive				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No							The policy requires proposals to provide high quality (hard & soft) landscaping, amenity space and play space to support the overall	No		

<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>	Conserve, enhance and repair natural and semi natural habitats?	Yes								quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit. This addresses several of the assessment questions and supports the achievement of this IIA objective. A potential minor positive effect is therefore identified.			
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes											
	Achieve biodiversity net gain (BNG) in new developments?	Yes											
	Provide new or improved access to greenspaces?	Yes											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes											
	<b>Protect sites of geological importance?</b>	<b>No</b>											
<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Moderate	Medium/Long	Borough wide	Permanent/irreversible	Minor positive	The policy has the potential to support the achievement of this IIA objective and could support several of the assessment questions. The policy requires proposals to respond appropriately to the local context in terms of e.g. building height, bulk, massing and existing design characteristics. Proposals should also incorporate durable high-quality materials that reflect local character and ensure a high quality appearance is maintained over the lifetime of the development. These requirements should help to protect and enhance the setting of historic assets and the historic environment. A potential minor positive effect is therefore identified.	No		The policy could mention heritage-led regeneration and responding to local cultural and historic character in order to perform more positively.	
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	Yes											
		<b>No</b>											
	Help provide solutions to those assets on the Heritage at Risk register?												
<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	High	Medium/Long	Borough wide	Permanent/irreversible	Minor positive	The policy has the potential to support the achievement of this IIA objective and supports several of the assessment questions. The policy requires high quality and contextually successful design. It requires proposals to respond appropriately to the local context in terms of e.g. building height, bulk, massing and existing design characteristics. Proposals should also incorporate durable high-quality materials that reflect local character and ensure a high quality appearance is maintained over the lifetime of the development. These requirements should help to protect and enhance the setting of landscape and townscape. A potential minor positive effect is therefore identified.	No		The policy could mention protection of landscape and townscape features such as trees and protecting sensitive areas and protected views in order to perform more positively.	
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	Yes											
	Safeguard landscape and townscape features such as trees?	Yes											
<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>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Direct	Medium	Medium/Long	Borough Wide	Permanent/irreversible	Minor Positive	The policy requires proposals to incorporate sustainability measures, durable high-quality materials and to contribute where feasible to the circular economy. Sustainability measures could be interpreted to include water efficiency and efficient use of materials. A potential minor positive effect is therefore identified.	No			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	Yes											
	Protect soil quality and avoid soil pollution?	Yes											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	Yes											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
		Yes											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	Yes											
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/irreversible	Minor Positive	The policy requires proposals to incorporate sustainability measures and to contribute where feasible to the circular economy. Sustainability measures could be interpreted to include the reuse of demolition materials and sustainable materials. A potential minor positive effect is therefore identified.	No			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes											
	Ensure waste is dealt with in line with circular economy principles?	Yes											
			<b>No</b>										
		Safeguard existing waste management sites?											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA7: The policy requires proposals to ensure amenity for existing and future occupiers would be safeguarded with regards to the impact of the proposed use and activity on noise, vibration, dust, air quality and light pollution on future and existing occupiers. A potential significant positive effect is therefore identified.

Potential Cumulative Effects Identified

Mitigation

IIA1: The policy would perform more positively if it referenced provision of home / flexible work space within design of new developments.

Enhancements

IIA3: The performance of this policy could be improved if it also encouraged developers to provide new or improved facilities such as community meeting facilities, education, retail, sports and leisure, health etc.

Policy/Alternative name	GR2 Inclusive Neighbourhoods
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of inclusive neighbourhoods.
Assumptions Made	None.

IIA framework			Assessment																				
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The policy requires non-residential development and change of use proposals to be appropriately located to sustain town centres, neighbourhood parades and local employment opportunities. This addresses some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	Yes																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy requires that non-residential development and change of use proposals must be accessible to all and with dignity. New residential development and conversion proposals must provide accessible homes, ensuring good access to services and facilities. All proposals must be safe and secure for Harrow's diverse population in line with Secured by Design principles. Finally, the policy requires major development within town centres including proposals for public buildings, visitor attractions and tourist accommodation, and Green Grid projects, to make appropriate provision for the comfort and convenience of all users, including those with special mobility requirements. This addresses some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.			The performance of this policy could be improved if it also encouraged developers to provide new or improved facilities such as community meeting facilities, education, retail, sports and leisure, health etc.											
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	Yes																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy requires that non-residential development and change of use proposals must be accessible to all and with dignity. New residential development and conversion proposals must provide accessible homes, ensuring good access to services and facilities. All proposals must be safe and secure for Harrow's diverse population in line with Secured by Design principles. Major proposals will be expected to demonstrate how they contribute to the creation of inclusive neighbourhoods within and beyond the site boundary. Where appropriate this must include public realm improvements to enhance permeability and useability for walking & cycling and compliance with Local Plan Policy GR3 (Public realm and connecting places) and Policy M1 (Sustainable Transport). These requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		Yes																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing?		Yes																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy requires that non-residential development and change of use proposals must be accessible to all and with dignity. Major proposals will be expected to demonstrate how they contribute to the creation of inclusive neighbourhoods within and beyond the site boundary. Where appropriate this must include public realm improvements to enhance permeability and useability for walking & cycling and compliance with Local Plan Policy GR3 (Public realm and connecting places) and Policy M1 (Sustainable Transport). These requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	Yes																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. These assessment questions are addressed by the High Quality Design policy (GR1). Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change:	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														

Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Low	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy encourages sensitive adaptations of heritage assets which contribute to the creation of lifetime neighbourhoods whilst taking into consideration other relevant development plan policies. This has the potential to address several of the assessment questions and supports the overall achievement of the IIA objective and therefore a potential minor positive effect is identified.				
	Maintain and enhance access to cultural heritage assets?	Yes											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	Yes											
	Encourage heritage-led regeneration?	Yes											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes		N/A	N/A	N/A	N/A	Neutral	The policy requires the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure to contribute to the creation of inclusive neighbourhoods. This could have relevance to local character and landscape. The policy encourages adaptation of heritage assets which could have indirect positive effects on townscape. Overall a neutral effect is identified as the policy does not specifically mention townscape, local character and distinctiveness and these matters are addressed by other policies within the Local Plan, such as the High Quality Design Policy (GR1).				
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA3: The performance of this policy could be improved if it also encouraged developers to provide new or improved facilities such as community meeting facilities, education, retail, sports and leisure, health etc.

Policy/Alternative name	GR3 Public Realm and Connecting Places
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	This policy outlines how new public realm development will be supported where appropriate.
Assumptions Made	None.

IIA framework		Assessment															
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy relates to new public realm developments and requires them to be designed to achieve the Mayor's Healthy Streets for London indicators. The policy inherently supports walking and cycling. It requires wayfinding signs and infrastructure for cyclists to be provided in a sufficient and well designed manner. The policy encourages provision of areas of rest including seating, shade, and shelter which should assist more vulnerable members of protected groups. The policy states that all new public realm should be developed in accordance with Policy GR2 Inclusive Design and GRXX Safety and Security and Resilience to Hazards. These requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.			The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.					
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes															
	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?	Yes															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Indirect	Medium	Medium (10yrs)	Localised	Permanent/Irreversible					Minor Positive	The policy encourages public art within the public realm and, where appropriate, public realm should be adaptable for performance / cultural uses. The policy also supports active travel. These factors support the overall achievement of this IIA objective and a potential minor positive effect is identified.			
		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?	Yes														
Increase and improve opportunities for active travel including walking and cycling?		Yes															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		Yes															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No															
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?		Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy relates to new public realm developments and requires them to be designed to achieve the Mayor's Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner. The policy inherently supports walking and cycling. It requires wayfinding signs and infrastructure for cyclists to be provided in a sufficient and well designed manner. These requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.			The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.					
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?																
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?																
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?		Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy relates to new public realm developments and requires them to be designed to achieve the Mayor's Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner. It also mentions consideration of night time as well as day time wayfinding. The policy requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.			The policy could be improved with inclusion of requirements regarding the design of lighting of the public realm to ensure safety but also avoid unnecessary light pollution.					
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?																
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Medium	Short/Medium	Borough Wide	Permanent/Irreversible	Minor Positive	The policy encourages the careful implementation of electric car charging points into the public realm. This supports this IIA objective and addresses one of the assessment questions. A potential minor positive effect is therefore identified.			The policy could be improved with inclusion of requirements regarding the energy efficiency of public realm lighting.					
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	Yes															
	Minimise greenhouse gas emissions?	Yes															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Direct	Low	Short/Medium	Localised	Permanent/Reversible	Minor Positive	The policy encourages the provision of areas of rest including seating, shade, and shelter which may be increasingly required with hotter, drier summers and wetter winters. Provision of free drinking water also supports sustainable use of materials and adapting to warmer summers. In addition, the policy states that public realm should, where practicable, provide for environmental improvements in accordance with relevant policies in Chapter 7 of the Local Plan. These policy requirements address some of the assessment questions and supports the achievement of the IIA objective. A potential minor positive effect is identified.								
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy states that all new public realm should, where practicable, provide for environmental improvements in accordance with relevant policies in Chapter 7 of the Local Plan. This should promote the creation of new habitats in urban areas which may result in			The policy could encourage the introduction of habitats within public realm developments (i.e. living walls, green roofs on shelters, flower meadow verges) which connect with other					
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No															
	Conserve, enhance and repair natural and semi-natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes															

and improve connectivity between, and access to, green spaces and functional habitats.	Achieve biodiversity net gain (BNG) in new developments?	Yes								biodiversity benefits. A potential minor positive effect is therefore identified.		greenspace/habitats and support the creation of networks of habitat across the borough.
	Provide new or improved access to greenspaces?	Yes										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Low	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy requires new public realm to respond to the local and historic context in which it is proposed to be located within. It also ensures that glare from new lighting does not impact the historic environment. A potential minor positive effect is therefore identified.			
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
	Help provide solutions to those assets on the Heritage at Risk register?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy requires new public realm to respond to the context in which it is proposed to be located within. This supports the achievement of this objective and several of the assessment questions and therefore a potential minor positive effect is identified.			The policy does not mention the design of the public realm to respond specifically to the existing landscape/townscape character and local distinctiveness. Safeguarding landscape and townscape features such as trees is also not mentioned. If these requirements were added to the policy it would perform more positively.
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	Yes										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No		N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA3: The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.  
 IIA6: The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.  
 IIA7: The policy could be improved with inclusion of requirements regarding the design of lighting of the public realm to ensure safety but also avoid unnecessary light pollution.  
 IIA8: The policy could be improved with inclusion of requirements regarding the energy efficiency of public realm lighting.

Policy name	Policy GR3A: Inclusive Design
Chapter	Chapter 02: High Quality Growth
Policy description	The policy outlines that new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances. There should be no inhibiting barriers to access and use, and developments must be designed with inbuilt flexibility to ensure that they can be adapted for inclusivity and the changing needs of a building's occupants over its lifetime. Developments must be designed in line with Secure by Design principles, specifically considering the safety of women, children and the disabled. Housing developments must be tenure neutral, there must be no design differences based on the tenure of dwellings. All communal private amenity space must be accessible to all residents regardless of tenure. Adaptations to heritage assets will be supported where they make the building or surrounds safer and more inclusive, and substantial harm to heritage significance of the asset is avoided. Commercial and public buildings must have accessible public toilet provision in line with the latest British Standard, including child changing stations accessible to all parents and carers.
Assumptions Made	It is assumed that this policy will work alongside Policy G1 and G2.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA3 as all new development must comply with accessibility and inclusivity design standards. Safe and accessible developments should specifically consider women, the disabled and the elderly in their design and all new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances. This includes the provision of tenure neutral residential buildings, and the provision of accessible public toilets in commercial and public buildings. This will ensure that all new development will be built to avoid any adverse/ discriminatory impact on protected characteristics/equality groups. Therefore, a potential significant positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	Yes											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes											
	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?	Yes											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as all new development must comply with accessibility and inclusivity design standards, including those relating to safety. This includes the specific consideration of women, children and the disabled. This will contribute towards the achievement of safe neighbourhoods. Therefore, a potential minor positive effect is recorded.				
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as all new development must comply with accessibility and inclusivity design standards. This includes ensuring that there are no barriers to use and access of the development, and that the development is flexible for the changing needs of residents. This will ensure that new development meets the needs of all residents, including those that are elderly or disabled. Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes											
	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?	Yes											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	Direct	Medium	Medium/L ong	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA6 as it seeks to ensure developments are designed to avoid / remove inhibiting barriers to access and use of public transport, provision of accessible facilities, as well as requiring the built environment to ensure safety of different users. This may positively impact public safety and travel experiences and hence encourage use of more sustainable modes of transport. Therefore, a potential minor positive effect is recorded.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultra low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between and access to green spaces	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											



and improve connectivity between, and access to, green spaces and functional habitats.	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Low	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA11 as adaptations to make heritage assets safer and more inclusive will be supported where harm to the asset is avoided. This will help to enhance access to heritage assets, whilst also conserving them. This should help to improve the overall condition of Harrows historic environment. Therefore, a potential minor positive effect is recorded.				
	Maintain and enhance access to cultural heritage assets?	Yes											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	Yes											
	Encourage heritage led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA3: The policy supports the achievement of objective IIA3 as all new development must comply with accessibility and inclusivity design standards. Safe and accessible developments should specifically consider women, the disabled and the elderly in their design and all new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances. This includes the provision of tenure neutral residential buildings, and the provision of accessible public toilets in commercial and public buildings. This will ensure that all new development will be built to avoid any adverse/ discriminatory impact on protected characteristics/equality groups. Therefore, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy name	Policy GR3B: Safety, Security and Resilience to Hazards
Chapter	Chapter 02: High Quality Growth
Policy description	The policy outlines that all new public realm must be safe for residents and visitors, incorporating anti-terrorism measures including controlled access for vehicles, safe exists, natural surveillance, limited hiding spaces and security cameras. Any new build and conversions of existing buildings must consider the requirement for counter terrorism and secure by design measures. Matters such as crime, fear of crime and anti-social behaviour opportunities should be mitigated using secure by design measures, and any increased vulnerability should be considered through a full risk assessment.
Assumptions Made	This policy will work alongside Policy GR3 (Public Realm & Connecting Places).

IIA objective	IIA framework			Assessment												
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement				
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Support the provision of world class infrastructure and connectivity?	No														
	Support flexible working practices?	No														
	Protect and retain an adequate supply of employment floor space to address business needs?	No														
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No														
	Safeguard existing town centres?	No														
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No														
	Improve existing shopping facilities within town centres and neighbourhood parades?	No														
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No														
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No														
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No														
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Increase the delivery of new or enhanced community and health facilities?	No														
	Help ensure all children have access to a local school within reasonable walking distance?	No														
	Increase education facility provision for children with learning disabilities?	No														
	Ensure local facilities have capacity to accommodate proposed development?	No														
	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?	No														
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No														
	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?	No														
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive					The policy supports the achievement of objective IIA4 as all new public realm must be safe for residents and visitors, incorporating anti-terrorism measures including controlled access for vehicles, safe exists, natural surveillance, limited hiding spaces and security cameras. This should help to create safe and attractive neighbourhoods. Additionally, any new build/conversion must implement secure by design measures to minimise crime and anti-social behaviour opportunities. Therefore, a potential minor positive effect is recorded.			
	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?	No														
Increase and improve opportunities for active travel including walking and cycling?	No															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No															
Increase provision of private amenity space?	No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No															
Ensure all representative groups will be consulted and engaged with?	No															
Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No															
Provide affordable homes of the tenure and size to meet the identified needs?	No															
Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
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?	No															
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No														
	Improve existing cycling and walking network and provide new routes?	No														
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No														
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No														
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No														
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Support the shift towards usage of electric and ultra low emissions vehicles?	No														
	Promote a low carbon local economy?	No														
	Ensure new developments are energy efficient?	No														
	Minimise greenhouse gas emissions?	No														
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No														
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No														
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No														
	Conserve, enhance and repair natural and semi-natural habitats?	No														
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No														
	Achieve biodiversity net gain (BNG) in new developments?	No														
	Provide new or improved access to greenspaces?	No														
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No														
	Protect sites of geological importance?	No														
IIA11 Cultural Heritage: To conserve and/or enhance heritage assets, historic environment, and their settings?	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
	Maintain and enhance access to cultural heritage assets?	No														

IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No												
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No												
	Improve the condition of the historic environment?	No												
	Encourage heritage-led regeneration?	No												
	Help provide solutions to those assets on the Heritage at Risk register?	No												
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Promote high quality and contextually successful design?	No												
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No												
	Protect sensitive areas and protected views?	No												
	Safeguard landscape and townscape features such as trees?	No												
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Avoid development of greenfield land?	No												
	Promote the efficient use of minerals?	No												
	Protect soil quality and avoid soil pollution?	No												
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No												
IIA14 Waste: To minimise waste.	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No												
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No												
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No												
	Ensure waste is dealt with in line with circular economy principles?	No												
	Safeguard existing waste management sites?	No												

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR4 Building Heights
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines that tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure). The Council will seek to restrict proposals for tall buildings outside the identified tall building zones.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA1 as all tall buildings (7 storeys or 21m from the ground level to the highest point of the building) are directed for development within the Harrow and Wealdstone Opportunity Area. As tall buildings are often designated as employment spaces (e.g.: offices) this could positively impact the economic development of the opportunity area. Therefore, a potential minor positive effect is recorded.	No			
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as safety should be incorporated into the design of tall buildings. For example, means of escape for fire. Consideration of this must include two staircases and be of a capacity to ensure or users, including maximum occupiers at any time of a communal area, are able to evacuate in a safe manner. A fire safety assessment must support any tall building application. Therefore, due to the consideration of safety and wellbeing, a potential minor positive effect is recorded.	No			
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Indirect	Medium	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as all tall buildings (7 storeys or 21m from the ground level to the highest point of the building) are directed for development within the Harrow and Wealdstone Opportunity Area. As tall buildings are often designated as flats this could contribute to the provision of additional homes within Harrow. Therefore, a potential minor positive effect is recorded.	No			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA7 as all tall buildings (7 storeys or 21m from the ground level to the highest point of the building) must comply with Policy D9 of the London Plan (2021). This policy states that buildings must be designed to minimise light and noise pollution. Therefore, a potential minor positive effect is recorded.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
Protect sites of geological importance?	No												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA11 as developments must demonstrate how they will protect and preserve local heritage views, vistas and landmarks. Therefore, a potential minor positive effect is recorded.	No			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											

	Encourage heritage-led regeneration?	No										
	Help provide solutions to those assets on the Heritage at Risk register?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Reversible	Significant Positive	The policy supports the achievement of objective IIA12 as developments must demonstrate compliance with the design criteria in relation to visual, functional, environmental and cumulative impacts as set out in Policy D9C (Tall buildings) of the London Plan (2021). Additionally, directing the development of tall buildings into	No		
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes										
	Protect sensitive areas and protected views?	Yes										
	Safeguard landscape and townscape features such as trees?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA12: The policy supports the achievement of objective IIA12 as developments must demonstrate compliance with the design criteria in relation to visual, functional, environmental and cumulative impacts as set out in Policy D9C (Tall buildings) of the London Plan (2021). Additionally, directing the development of tall buildings into the Harrow and Wealdstone Opportunity Area will help to safeguard the design of suburban areas, which are commonly made up of two storey residential properties. The policy also considers that the stitching of tall buildings into less dense tall character areas must be satisfactorily demonstrated, as to not negatively impact the townscape character. RAF Northolt Safeguarding Zones will also be protected through the policy. Therefore, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy name	Policy GR4A: Basement Development
Chapter	Chapter 02: High Quality Growth
Policy description	The policy outlines that basement development will be supported for ancillary accommodation where: a. Do not harm neighbouring residential amenity; b. Do not comprise more than 50% of the amenity spaces within a site; c. Do not extend into the rear garden greater than 50% of the depth of the host dwelling when measured from the principal rear elevation; d. Do not exacerbate flood risk, ground water conditions, ground stability or harm tree roots within the application site or neighbouring sites; e. Remain as ancillary accommodation to the primary dwelling, retaining internal access through the primary dwelling with satisfactory amenity conditions. f. Provide ancillary features such as lightwells, grilles and railings that are appropriate in size and number and do not result in visual clutter within the front garden causing harm to the street scene. g. Continue to provide for appropriate landscaping and parking provision within the front garden Habitable space within basement proposals located within Flood zone 3A/3B will not be supported.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment															
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement													
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No														
	Support the provision of world class infrastructure and connectivity?	No																							
	Support flexible working practices?	No																							
	Protect and retain an adequate supply of employment floor space to address business needs?	No																							
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																							
	Safeguard existing town centres?	No																							
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																							
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																							
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																							
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																							
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																							
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No														
	Increase the delivery of new or enhanced community and health facilities?	No																							
	Help ensure all children have access to a local school within reasonable walking distance?	No																							
	Increase education facility provision for children with learning disabilities?	No																							
	Ensure local facilities have capacity to accommodate proposed development?	No																							
	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?	No																							
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No																							
	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?	No																							
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive					The policy supports the achievement of objective IIA4 as basement development will not be supported where more than 50% of amenity space will be removed or residential amenity is harmed. Subsequently, this provides protection for amenity space, helping to support the health and wellbeing of residents. Additionally, the requirement for basement developments to provide ancillary features (e.g.: lightwells) will improve the wellbeing of residents living in basements, by providing them with natural light. Therefore, a potential minor positive effect is recorded.											
		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?	No																						
Increase and improve opportunities for active travel including walking and cycling?		No																							
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																							
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																							
Increase provision of private amenity space?		Yes																							
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																							
Ensure all representative groups will be consulted and engaged with?		No																							
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No							Direct	Low	Medium/L ong	Borough Wide						Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as support for the development of basements will increase living space available within homes, which may allow for the provision of a new bedroom. This should subsequently support larger households in the Borough. Therefore, a potential minor positive effect is recorded.				
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes																						
	Provide affordable homes of the tenure and size to meet the identified needs?	No																							
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																							
	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?	No																							
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes																							
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No															
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																							
	Improve existing cycling and walking network and provide new routes?	No																							
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																							
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																							
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No															
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																							
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No															
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No																							
	Promote a low carbon local economy?	No																							
	Ensure new developments are energy efficient?	No																							
	Minimise greenhouse gas emissions?	No																							
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA9 as basement development will not be supported in flood zones 3a/3b. Subsequently, this minimises flood risk for developments. Therefore, a potential minor positive effect is recorded.	No															
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																							
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																							
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between and access to green	Avoid adverse effects on European designated habitats sites?	No	Indirect	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA10 as basement development will not be supported where more than 50% of amenity space will be removed. Subsequently, this provides some protection for habitats and species residing in amenity space. Additionally, basement development should not harm tree roots.	No															
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																							
	Conserve, enhance and repair natural and semi natural habitats?	Yes																							
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																							
	Achieve biodiversity net gain (BNG) in new developments?	No																							



Policy/Alternative name	GR5 View Management
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines that the protected views identified in Harrow will be safeguarded. Development within a Protected Views Restricted Corridor that exceeds the specified threshold height will be refused. Development within a Protected Views Setting Corridor should form an attractive element in its own right and conserve or enhance the viewers' ability to recognise and to appreciate the landmark.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment													
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium/L ong	Borough Wide	Temporary/Reversible	Minor Positive	The policy supports the achievement of objective IIA3 as viewing places for protected views should be accessible and managed so that they enhance people's experience of the view. Therefore, a potential minor positive effect is recorded.	No													
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No												
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																						
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
	Achieve biodiversity net gain (BNG) in new developments?	No																					
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes																					
	Maintain and enhance access to cultural heritage assets?	No																					
			Direct	Low	Medium/L ong	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA11 as it safeguards protected views identified within Harrow, including that	No													





Policy/Alternative name	GR6 Areas of Special Character
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how Special Character Areas will be considered in development proposals. Proposals affecting an area of special character will be assessed against a set of criteria, including impact on strategic value, desirability of preserving or enhancing the environmental, architectural, historic and landscape features and protected views. Proposals that would substantially harm an area of special character, or its setting, will be refused.
Assumptions Made	None.

IIA objective	IIA framework		Assessment									
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No										
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No										
	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?	No										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	Indirect	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy indirectly supports the achievement of objective IIA4 as proposals that would increase opportunities for appreciation of, or public access to, areas of special character will be supported. As these areas provide open/natural land, their protection from development will ensure that residents are provided with access to open space. Therefore, a potential minor positive effect is recorded.			
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No										
	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?	No										
	Increase and improve opportunities for active travel including walking and cycling?	No										
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy indirectly supports the achievement of objective IIA7 as proposals that would increase opportunities for appreciation of, or public access to, areas of special character will be supported. As these areas provide substantial tree cover and open/natural land, they are subsequently contributing to the achievement of low light, air and noise pollution within the Borough. Therefore, a potential			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Support the shift towards usage of electric and ultra low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Indirect	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy indirectly supports the achievement of objective IIA10 as proposals that would increase opportunities for appreciation of, or public access to, areas of special character will be supported. As these areas provide substantial tree cover and open/natural land, they are subsequently supporting biodiversity. Therefore, a potential minor positive effect is recorded.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	Yes										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes										
	Achieve biodiversity net gain (BNG) in new developments?	No										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
	Protect sites of geological importance?	No										
Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes											
Maintain and enhance access to cultural heritage assets?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA11 as proposals that would increase opportunities for appreciation of, or public				

<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes								access to, heritage assets within areas of special character will be supported. Proposals that would substantially harm heritage assets within an area of special character, or its setting, will be refused. Therefore, a potential minor positive effect is recorded.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No								
	Improve the condition of the historic environment?	No								
	Encourage heritage-led regeneration?	No								
	Help provide solutions to those assets on the Heritage at Risk register?	No								
<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA12 as proposals that would increase opportunities for appreciation of, or public access to, areas of special character will be supported and proposals that would substantially harm an area of special character, or its setting, will be refused. This includes those that would have an	
	Promote high quality and contextually successful design?	No								
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes								
	Protect sensitive areas and protected views?	Yes								
	Safeguard landscape and townscape features such as trees?	No								
<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>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No								
	Promote the efficient use of minerals?	No								
	Protect soil quality and avoid soil pollution?	No								
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No								
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No								
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Encourage new developments to provide adequate space for waste separation?	No								
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No								
	Ensure waste is dealt with in line with circular economy principles?	No								
	Safeguard existing waste management sites?	No								

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR7 External Lighting
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how external lighting will be considered in development proposals. New development should incorporate appropriate external lighting and be designed to mitigate wider harm. Proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers, or harmful to biodiversity.
Assumptions Made	None.

IIA framework			Assessment														
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible					Minor Positive	The policy supports the achievement of objective IIA4 as proposals for external lighting incorporated into new developments should help to ensure Secure by Design. Appropriate levels of external lighting, such as through the provision of clear lines of sight, help to make sure that people feel safe. Proposals for floodlighting will also be supported where they would enhance sport facilities, helping to improve existing recreational facilities. Therefore, a potential minor positive effect is recorded.			
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		No															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		Yes															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	No															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA7 as proposals for external lighting incorporated into new developments should be designed to minimise light pollution and light trespass, created by poor angling of lights. New developments should prepare a lighting strategy, which details lighting requirements and any mitigation identified for impacts on the wider area. Therefore, a potential minor positive effect is recorded.								
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the shift towards usage of electric and ultra low emissions vehicles?	No															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	No															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA10 as proposals for external lighting incorporated into new developments should be designed with existing biodiversity and natural habitats in mind (such as priority habitats, species, protected sites, rivers and their corridors). Lighting should minimise the level of illumination required, glare, angle and light trespass, in order to mitigate any harm to sensitive receptors such as species. Therefore, a potential minor positive effect is recorded.								
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No															
	Conserve, enhance and repair natural and semi natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes															
	Achieve biodiversity net gain (BNG) in new developments?	No															
	Provide new or improved access to greenspaces?	No															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No															
	Protect sites of geological importance?	No															

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA12 as proposals for floodlighting for sports facilities will be supported where it would not be detrimental to the character of the open land. Additionally, external lighting incorporated into new developments should be appropriate for its purpose and its setting. Proposals within or in close proximity to Green Belt, Metropolitan Open Land, and Open space must consider these as areas of less light source, and proposals should not harm this context. Therefore, a potential minor positive effect is recorded.			
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes										
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
<b>IIA14 Waste:</b> To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage new developments to provide adequate space for waste separation?	No										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR8 Shopfronts and Forecourts
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how shopfronts and forecourts will be considered in development proposals. Proposals will be assessed against a set of criteria, including how the shopfront/forecourt incorporates appropriate safety and design, as well as supports the preservation of heritage assets and accessibility. The policy also considers security shutters and tables, chairs and other ancillary paraphernalia.
Assumptions Made	None.

IIA framework			Assessment										
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA1 as proposals for well designed shopfronts can contribute to the success of the Borough's shopping areas, and subsequently supports economic growth. For example, outdoor dining areas provide opportunities for businesses to increase their turnover as they are able to provide for more customers. Therefore, a potential minor positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: o education facilities? o recreation facilities? o health services?	No	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where they provide inclusive access for customers and employees of all abilities. Tables, chairs and other ancillary paraphernalia on forecourts must also ensure that pedestrian thoroughfare is not obstructed, allowing for the free flow of pedestrians including those with disabilities. Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	Yes											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes											
	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?	Yes											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where they are designed safely to ensure that they do not obstruct/adversely affect pedestrian or highway safety, particularly for users with visual impairment or impaired mobility. Tables, chairs and other ancillary paraphernalia on forecourts must ensure that highway safety is not compromised. Where security shutters are proposed they should be of an open mesh design and ideally internally located internally, in order to lessen community fear of crime. If appropriate, safety and security features including toughened glass should be installed.				
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No												
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes											
	Maintain and enhance access to cultural heritage assets?	No											

IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes									development on forecourts will be supported where they would conserve or enhance the significance of heritage assets. Proposals will also be supported where the illumination of shopfronts and forecourts would not detrimentally affect the significance of heritage assets. Finally, reinstatement of traditional awnings or canopies that were historically part of the shop would be supported. Therefore, a potential minor positive effect is recorded.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No									
	Improve the condition of the historic environment?	No									
	Encourage heritage-led regeneration?	Yes									
	Help provide solutions to those assets on the Heritage at Risk register?	No									
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive		The policy supports the achievement of objective IIA12 as proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where they are of a scale and proportion appropriate to the host building, architectural character and the wider character of the area. Advertisements for shopfronts must accord with the requirements set out in Policy GR9, specifically in relation to Conservation Areas. Therefore, a potential minor positive effect is recorded.	
	Promote high quality and contextually successful design?	Yes									
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No									
	Protect sensitive areas and protected views?	No									
	Safeguard landscape and townscape features such as trees?	No									
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No									
	Promote the efficient use of minerals?	No									
	Protect soil quality and avoid soil pollution?	No									
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No									
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No									
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No									
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No									
	Ensure waste is dealt with in line with circular economy principles?	No									
	Safeguard existing waste management sites?	No									

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR9 Outdoor Advertisements, Digital Displays and Hoardings
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how outdoor advertisements, digital displays and hoardings will be considered in development proposals. Proposals will be assessed against a set of criteria, including how the advertisements/display incorporates appropriate safety and design, as well as supports accessibility.
Assumptions Made	None.

IIA objective	IIA framework			Assessment						Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement			
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance								
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Support the provision of world class infrastructure and connectivity?	No														
	Support flexible working practices?	No														
	Protect and retain an adequate supply of employment floor space to address business needs?	No														
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No														
	Safeguard existing town centres?	No														
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No														
	Improve existing shopping facilities within town centres and neighbourhood parades?	No														
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No														
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No														
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No														
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA3 as proposals for advertisements on buildings and freestanding units will be supported where they help to achieve an inclusive, legible environment. This should ensure that advertisements are accessible to everyone, regardless of any language/sight/hearing barriers. Therefore, a potential minor positive effect is recorded.							
	Increase the delivery of new or enhanced community and health facilities?	No														
	Help ensure all children have access to a local school within reasonable walking distance?	No														
	Increase education facility provision for children with learning disabilities?	No														
	Ensure local facilities have capacity to accommodate proposed development?	No														
	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?	No														
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes														
	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?	Yes														
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive					The policy supports the achievement of objective IIA4 as proposals for advertisements on buildings and freestanding units will be supported where they do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security. Advertisements should also contribute to the safety of the environment for pedestrians, cyclists and drivers. Therefore, a potential minor positive effect is recorded.			
	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?	No														
Increase and improve opportunities for active travel including walking and cycling?	No															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No															
Increase provision of private amenity space?	No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No															
Ensure all representative groups will be consulted and engaged with?	No															
Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No															
Provide affordable homes of the tenure and size to meet the identified needs?	No															
Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
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?	No															
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral					The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
Improve existing cycling and walking network and provide new routes?	No															
Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
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	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No							The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Significant Positive					The policy supports the achievement of objective IIA7 as proposals for advertisements on buildings and freestanding units will be supported where they do not adversely affect the amenity of any residential or sensitive area, through siting, light or noise. Therefore, as the policy aims to minimise noise and light pollution from advertisements, a potential significant positive effect is recorded.			
Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Support the shift towards usage of electric and ultra low emissions vehicles?	No														
	Promote a low carbon local economy?	No														
	Ensure new developments are energy efficient?	No														
	Minimise greenhouse gas emissions?	No														
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No														
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No														
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No														
	Conserve, enhance and repair natural and semi-natural habitats?	No														
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No														
	Achieve biodiversity net gain (BNG) in new developments?	No														
	Provide new or improved access to greenspaces?	No														
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No														
	Protect sites of geological importance?	No														
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive					The policy supports the achievement of objective IIA11 as proposals for advertisements on buildings and freestanding units will be			
	Maintain and enhance access to cultural heritage assets?	No														



<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No								supported where they do not adversely affect the visual amenity of any sensitive area including conservation areas. Listed buildings (including locally listed buildings) should also be considered sensitively, and advertisement near these assets may require listed building consent. Therefore, a potential minor positive effect is recorded.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No								
	Improve the condition of the historic environment?	No								
	Encourage heritage-led regeneration?	No								
	Help provide solutions to those assets on the Heritage at Risk register?	No								
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA12 as proposals for advertisements on buildings and freestanding units will be supported where they do not adversely affect the visual amenity of any sensitive area including the Green Belt, Metropolitan Open Land, and Areas of Special Character. They should also be appropriate in scale and illumination to the location and the host building. Similarly, advertisements on Electric Vehicle charging stations must be proportionate to the charging station and should advertise the service provider only. Therefore, a potential minor positive effect is recorded.	
	Promote high quality and contextually successful design?	Yes								
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No								
	Protect sensitive areas and protected views?	No								
	Safeguard landscape and townscape features such as trees?	No								
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No								
	Promote the efficient use of minerals?	No								
	Protect soil quality and avoid soil pollution?	No								
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No								
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No								
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No								
<b>IIA14 Waste:</b> To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No								
	Ensure waste is dealt with in line with circular economy principles?	No								
	Safeguard existing waste management sites?	No								

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA7: The policy supports the achievement of objective IIA7 as proposals for advertisements on buildings and freestanding units will be supported where they do not adversely affect the amenity of any residential or sensitive area, through siting, light or noise. Therefore, as the policy aims to minimise noise and light pollution from advertisements, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR10 Infill and Backland Sites, Back Gardens and Amenity Areas
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how infill and backland sites, back gardens and amenity areas will be considered in development proposals. Proposals will be assessed against a set of criteria, including how the area incorporates appropriate design, as well as supports the delivery of homes and biodiversity.
Assumptions Made	It is assumed that development relating to infill and backland sites, back gardens and amenity areas would not be widespread across the Borough, and would result in a low number of proposals for development.

IIA objective	IIA framework		Assessment							Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will be supported where the development is accessible to all. Therefore, due to the provision of accessibility, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	Yes											
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as proposals for gap sites located in an established street scene will be supported where they ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property. Proposals that are located on backland sites will be supported where they ensure secure by design measures have been addressed, and proposals for new housing on non-designated open space will be supported where they ensure highway safety is maintained. Therefore, due to the provision of private amenity areas and the implementation of secure measures, a potential minor positive effect is recorded.				
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	Yes											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
	Increase the number of additional homes delivered to meet local needs/targets?	Yes											
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will only be supported where proposals assist in the delivery of homes across the Borough [Strategic Housing Policy 03]. Additionally, proposals will be supported where the development is accessible to all. Therefore, due to the contribution of small sites to the delivery of housing across Harrow, a potential minor positive effect is recorded.				
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No											
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA6 as proposals for gap sites and backland sites will be supported where appropriate bike storage can be provided. Provision of bike storage should encourage residents to utilise active methods of travel such as cycling more often. Therefore, a potential minor positive effect is recorded.				
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes											
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No											
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA10 as proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will only be supported where they ensure a satisfactory quantum and quality of landscaping, which creates biodiversity enhancements. Therefore, a potential minor positive effect is recorded.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	Yes											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes											
	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No											
													N/A

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Maintain and enhance access to cultural heritage assets?	No								IIA objective. Therefore a neutral effect is predicted.			
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will only be supported if they are of high-quality design, more specifically if they are of appropriate scale and intensity. Therefore, a potential minor positive effect is recorded.				
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
<b>IIA14 Waste:</b> To minimise waste.	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA14 as proposals for gap sites and backland sites will be supported where appropriate waste storage and waste serving can be provided. Additionally, servicing and refuse collection will be adequately addressed. Therefore, a potential minor positive effect is recorded.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR11 Planning Obligations
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The policy outlines how planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as a non-monetary contribution relating to employment and training provision can be agreed as an obligation by the Council and developer, where new development requires a bespoke mitigation to make a scheme acceptable in planning terms. Therefore, a potential minor positive effect is recorded.	No			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	Yes											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium/L ong	borough Wide	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as the provision of the Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure such as schools, libraries and healthcare. This will support the cumulative impacts of development across the borough. Therefore, a potential minor positive effect is recorded.	No			
	Increase the delivery of new or enhanced community and health facilities?	Yes											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Low	Medium/L ong	borough Wide	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as the provision of the Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure such as libraries, as well as potential health, counter-terrorism and public realm improvements. This will support the cumulative impacts of development across the borough. Therefore, a potential minor positive effect is recorded.	No			
	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?	Yes											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	Direct	Medium	Medium/L ong	borough Wide	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as planning obligations will be implemented in residential development schemes to secure the provision of affordable housing, and to ensure that all relevant proposals mitigate site specific impacts that are necessary to the development. Therefore, a potential minor positive effect is recorded.	No			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	Direct	Low	Medium/L ong	borough Wide	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of objective IIA6 as the provision of the Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure such as public transport. Additionally, non-monetary contributions relating to travel plans can be agreed as an obligation by the Council and developer, where new development requires a bespoke mitigation to make a scheme acceptable in planning terms. Therefore, a potential minor positive effect is recorded.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	Yes											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and connectivity	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/ Reversible	Minor Positive	The policy supports the achievement of objective IIA10 as a non-monetary contribution relating to biodiversity net gain can be agreed as an obligation by the Council and developer, where new development requires a bespoke mitigation to make a scheme	No			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											

To regenerate and enhance biodiversity and connectivity and improve connectivity between, and access to, green spaces and functional habitats.	Achieve biodiversity net gain (BNG) in new developments?	Yes								acceptable in planning terms. Therefore, a potential minor positive effect is recorded.		
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
	Protect sites of geological importance?	No										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No							The policy supports the achievement of objective IIA12 as a non-monetary contribution relating to design can be agreed as an obligation by the Council and developer, where new development requires a bespoke mitigation to make a scheme acceptable in planning terms. Therefore, a potential minor positive effect is recorded.	No		
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	Direct	Low	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive				
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No							The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral				
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
IIA14 Waste: To minimise waste.	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No							The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GR12 Site Allocations
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	The Council will work with stakeholders (including utilities) to bring forward the site allocations identified in the Local Plan. This will include helping to unblock any barriers in relation to land assembly, site constraints and necessary infrastructure. The Council will use (or facilitate the use of) compulsory purchase powers to assemble land for development. Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability. Applicants must demonstrate all reasonable efforts have been made to assemble sites where adjacent properties would assist in site optimisation and a more efficient use of land. Any development that would prejudice the optimal delivery of a site allocation, or frustrates the delivery of a neighbouring site, will be resisted.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Indirect	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA3 as the Council will work to implement key infrastructure- such as education, health and recreation facilities- in order to support the development of site allocations. Therefore, a potential minor positive effect is recorded.	No			
	Increase the delivery of new or enhanced community and health facilities?	Yes											
	Help ensure all children have access to a local school within reasonable walking distance?	Yes											
	Increase education facility provision for children with learning disabilities?	Yes											
	Ensure local facilities have capacity to accommodate proposed development?	Yes											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA5 through delivery of the housing allocations. The site allocations will provide a range of housing developments to meet housing needs across the Borough. Therefore, a potential significant positive effect is recorded.	No			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes											
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes											
	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?	Yes											
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	Indirect	Low	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA6 as the Council will work to implement key infrastructure- such as sustainable transport- in order to support the development of site allocations. Therefore, a potential minor positive effect is recorded.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	Yes											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
	Avoid adverse effects on European designated habitats sites?	No											
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			

IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	Indirect	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA12 as the policy encourages co-ordinated design and layout of site allocations through land assembly. Therefore, a potential minor positive effect is recorded.	No			
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
Safeguard existing waste management sites?	No												

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA5: The policy supports the achievement of objective IIA5 through delivery of the housing allocations. The site allocations will provide a range of housing developments to meet housing needs across the Borough. Therefore, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 02: Harrow's Historic Environment
Chapter	Chapter 03: Heritage
Policy/alternative description	The policy outlines how the Council will manage the historic environment to ensure that development proposals conserve and enhance the significance of heritage assets (both designated or non-designated).
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment													
			Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy provides indirect support for IIA1 as it could help increase tourism in areas such as Harrow on the Hill, in relation to protected heritage assets and specified areas of the historic environment. This could subsequently contribute to economic development within localised areas of the Borough- such as Harrow on the Hill- as footfall could increase in nearby amenities. Therefore, a potential minor positive effect is recorded.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA9 as it supports integrated management measures to mitigate against climate change, as long as the significance of the asset is preserved. Therefore, a potential minor positive effect is recorded.														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Indirect	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy can be seen as indirectly supporting IIA10 as the protection of heritage assets and the historic environment, such as conservation areas, historic parks and gardens and local areas of special character, provided by the policy will likely benefit wildlife that utilise these areas. Therefore, a potential minor positive effect is recorded.														
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi natural habitats?	Yes																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?																						
	Achieve biodiversity net gain (BNG) in new developments?																						
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					
IIA11 Conservation: To conserve and/or enhance heritage assets, historic environment, and their settings?	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	High	Medium/Long	borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of IIA11 through the conservation and enhancement of both designated and non-designated heritage assets.														
	Maintain and enhance access to cultural heritage assets?	Yes																					



<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes								The policy takes a significance-based approach to the management of the historic environment. The social, cultural, economic and environmental benefits of heritage assets within the Borough should be promoted. Proposals will need to identify where they may affect heritage assets; applications that do have an impact must demonstrate compliance with wider development plan policies (National Planning Policy Framework and the London Plan 2021). Non-designated heritage assets will be continually reviewed for statutory and local designation. Developments that would improve access to, and understanding of heritage assets will be supported where the significance of the asset is conserved or enhanced. The deteriorated state of a heritage asset should not be taken into account when approving development. Restoration schemes and changes of use will be supported where they secure a long term future for the heritage asset. Therefore, a potential significant positive effect is recorded.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	Yes								
	Improve the condition of the historic environment?	Yes								
	Encourage heritage-led regeneration?	Yes								
	Help provide solutions to those assets on the Heritage at Risk register?	Yes								
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA12 by ensuring that new proposals developed within designated local strategic view areas, does not harm views to identified assets, such as St Mary's Church spire on Harrow on the Hill. Therefore, a potential minor positive effect is recorded.	
	Promote high quality and contextually successful design?	No								
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No								
	Protect sensitive areas and protected views?	Yes								
	Safeguard landscape and townscape features such as trees?	Yes								
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No								
	Promote the efficient use of minerals?	No								
	Protect soil quality and avoid soil pollution?	No								
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No								
	Protect groundwater and surface water, including water-bodies, from pollution and contribute to improving the water quality of groundwater and water-bodies?	No								
<b>IIA14 Waste:</b> To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Encourage new developments to provide adequate space for waste separation?	No								
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No								
	Ensure waste is dealt with in line with circular economy principles?	No								

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA11: The policy supports the achievement of IIA11 through the conservation and enhancement of both designated and non-designated heritage assets. The policy takes a significance-based approach to the management of the historic environment. The social, cultural, economic and environmental benefits of heritage assets within the Borough should be promoted. Proposals will need to identify where they may affect heritage assets; applications that do have an impact must demonstrate compliance with wider development plan policies (National Planning Policy Framework and the London Plan 2021). Non-designated heritage assets will be continually reviewed for statutory and local designation. Developments that would improve access to, and understanding of heritage assets will be supported where the significance of the asset is conserved or enhanced. The deteriorated state of a heritage asset should not be taken into account when approving development. Restoration schemes and changes of use will be supported where they secure a long term future for the heritage asset. Therefore, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	HE1 Historic Environment
Chapter	Chapter 03: Heritage
Policy/alternative description	The policy outlines how heritage assets will be considered in development proposals. Proposals should describe the significance of any heritage assets affected by development, including any contribution made by setting, and will be assessed through a Heritage Impact Assessment.
Assumptions Made	None.

IIA objective	IIA framework			Assessment							Potential for cumulative effects?	Mitigation	Enhancement										
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects														
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy indirectly provides support for IIA1 as proposals that secure the preservation, conservation or enhancement of a heritage asset's significance could help increase tourism in specified areas of the historic environment. This could subsequently contribute to economic development within these areas of the Borough, as footfall could increase in nearby amenities. Therefore, a potential minor positive effect is recorded.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the shift towards usage of electric and ultralow emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Indirect	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy can be seen as indirectly supporting IIA10 as the protection of heritage assets and the historic environment, such as conservation areas, historic parks and gardens and local areas of special character, provided by the policy will likely benefit and safeguard wildlife that utilise these areas. Therefore, a potential minor positive effect is recorded.														
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi natural habitats?	Yes																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes																					
	Achieve biodiversity net gain (BNG) in new developments?	No																					
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes																					
	Maintain and enhance access to cultural heritage assets?	Yes																					
Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes																						
Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	Yes																						
Improve the condition of the historic environment?	Yes																						
IIA11 Heritage Environment: To protect, conserve and enhance the historic environment, including its setting, and to ensure that new development is sensitive to its significance.	Support the preservation, conservation or enhancement of a heritage asset's significance, or which secure opportunities for sustainable enjoyment of the historic environment, whilst avoiding and minimising harm to heritage significance, will be supported. Proposals will need to identify the significance of heritage assets on development through a Heritage Impact Assessment. The Council will use planning conditions and	Yes	Direct	High	Medium/Long	borough Wide	Permanent/Reversible	Significant Positive	The policy supports the achievement of IIA11 as it highlights that proposals that secure the preservation, conservation or enhancement of a heritage asset's significance, or which secure opportunities for sustainable enjoyment of the historic environment, whilst avoiding and minimising harm to heritage significance, will be supported. Proposals will need to identify the significance of heritage assets on development through a Heritage Impact Assessment. The Council will use planning conditions and														



Policy/Alternative name	HE2 Enabling Development
Chapter	Chapter 03: Heritage
Policy/alternative description	Enabling development will only be supported where it is the only viable means of securing the long-term future of the heritage assets affected; and the enabling development is the minimum necessary, as demonstrated by robust evidence, to meet the conservation deficit and secure the long-term future of the heritage assets affected. The benefits of the proposal should also outweigh the disbenefits of departing from policy.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA1 as it allows the conversion of historic buildings where it is the only way to secure the long-term future of a heritage asset. This is likely to lead to higher revenue uses for the building. Therefore, a potential minor positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse / discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
	Increase the number of additional homes delivered to meet local needs/targets?	Yes											
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as it allows the conversion of historic buildings to housing where it is the only way to secure the long-term future of a heritage asset. Therefore, a potential minor positive effect is recorded.				
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No											
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Improve existing cycling and walking network and provide new routes?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No											
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	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	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)?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Support the shift towards usage of electric and ultra low emissions vehicles?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No											
	Maintain and enhance access to cultural heritage assets?	No											
			N/A	N/A	N/A	N/A	N/A	Neutral	The policy supports the conservation and enhancement of heritage assets, especially those on the heritage at risk register, as it allows the				

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No								conversion of heritage assets into developments where it is the only way to secure the long-term future of a heritage asset. Additionally, although it is uncertain what the proposed development would be, and the impact it would have on the heritage asset as a whole, Local Plan Policy HE1 Heritage Assets should mitigate any negative impacts, as proposed development will have to prove that harm is necessary to achieve substantial public benefits that outweigh that harm, in line with NPPF guidance. Therefore a neutral effect is identified.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No								
	Improve the condition of the historic environment?	No								
	Encourage heritage-led regeneration?	No								
	Help provide solutions to those assets on the Heritage at Risk register?	No								
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Promote high quality and contextually successful design?	No								
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No								
	Protect sensitive areas and protected views?	No								
	Safeguard landscape and townscape features such as trees?	No								
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No								
	Promote the efficient use of minerals?	No								
	Protect soil quality and avoid soil pollution?	No								
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No								
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No								
<b>IIA14 Waste:</b> To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No							The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral		
	Encourage the repurposing and refurbishing of buildings instead of demolition?	No								
	Ensure waste is dealt with in line with circular economy principles?	No								
	Safeguard existing waste management sites?	No								

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 03: Meeting Harrow's Housing Needs
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out the strategic vision for the development of homes across the Borough over the plan period, and includes the number of dwellings to be provided (minimum of 16,040 homes), the tenure of development (inc. specialist housing) and the safeguarding of current housing stock.
Assumptions Made	None.

IIA framework			Assessment									
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Medium	Medium/Long	Localised	Permanent/Reversible	Minor Positive	This policy will indirectly support IIA1 through the development of 7,500 new homes in the Harrow and Wealdstone Opportunity Area (which contains the Harrow Metropolitan and Wealdstone District Centres) and other key areas throughout the Borough - such as town centres. The small sites policy seeks to support the incremental intensification of existing residential areas to deliver additional homes within 800m of town centres (district, major, district) and tube/rail stations, as well as within PTAL 3-6. Therefore a potential minor positive effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes										
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy prioritises development within the Opportunity area, within /proximity to town centres (800m) and within proximity to tube/rail stations (800m). The plan also allows for change of use to provide supporting services and facilities. Sites should also be located where infrastructure has the most capacity to expand to support new homes. The need to provide housing for the elderly including care homes and adaptable homes to meet the needs of an ageing population is also specifically mentioned. In addition, specialist housing for vulnerable groups is noted as something that will be worked towards in collaboration with the NHS and charities. These criteria may therefore indirectly improve accessibility for residents to the services they require. Built to rent proposals will be supported where they support balanced, mixed and inclusive communities.	Yes		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	Yes										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?	Yes										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Yes	Low	Medium	Localised	Permanent/Reversible	Minor Positive	The policy sets out criteria for the regeneration of estates, which could help to increase access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well-being of communities. Therefore an indirect minor positive effect has been recorded.	No		
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	High	Long (20+yrs)	Borough Wide	Permanent/Irreversible	Significant Positive	A potential significant positive effect has been identified in relation to IIA5, as this policy aims to increase the number of homes across Harrow, as well as to ensure the right size, type and tenure. Specific focus will be on the provision of family homes and those to meet the needs of an ageing population, as well as ensuring genuine affordability for local people. New housing should be well designed to address the changing needs of its occupant (i.e. adaptable), so that they can live independently within their existing residence. Further it seeks to increase the delivery of specialist types of older person accommodation (including low cost rented affordable units) and care homes. The council will monitor the supply to additional older person accommodation to address local needs. Over the plan period the Council seeks to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be genuinely affordable to low-income groups those in need, based on assessment of local housing costs and incomes, in line with the London Plan. The delivery of a higher proportion of low cost rented housing, that are considered to be genuinely affordable to local residents, will be favoured over intermediate products. Gypsy and traveller accommodation and housing for those who require support and specialist housing is also provided by this policy.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	Yes										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	This policy prioritises development in locations which are accessible (e.g.: within 800m of town centres and tube/rail stations, as well as within locations with a PTAL 3-6), as well as prioritising residential development in areas with good existing transport links and services, such as Harrow and Wealdstone Opportunity Area (which includes Harrow Metropolitan and Wealdstone District Centres). These steps could help to promote sustainable travel habits, hence and indirect minor positive effect has been identified.	Yes		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
IIA7 Air, Light and Noise Pollution: To minimise air, light and noise	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Negative	The development of 16,040 homes over the plan period could contribute to air, noise and light pollution. It is noted that this will be dependent on the location and design of developments. Potential	Yes		

pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes								negative cumulative effects with regards to air, light and noise pollution in certain locations will be considered when site allocation options are assessed after the Regulation 18 consultation			
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Negative	This policy encourages the development of previously developed land in accessible locations, such as the Harrow and Wealdstone Opportunity area. Some aspects of this designation are also Metropolitan Open Land but it is assumed that Policy GI1 will protect MOL from development in this area. However, it is noted that the focusing of development into town and district centres could increase the risk of impacts on the townscape and character. Therefore a minor negative effect has been recorded.	No			
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes											
	Protect sensitive areas and protected views?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	Yes	Direct	Low	Medium/L ong	Borough Wide	Temporary/Reversible	Minor Positive	This policy specifically requires the prioritisation of previously developed land for future housing development. Therefore a potential minor positive effect has been identified.	No		The explicit mention of avoiding greenfield land where possible for future housing development could help to enhance the potential effect for IIA13.	
	Avoid development of greenfield land?	Yes											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No												
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA5: A potential significant positive effect has been identified in relation to IIA5, as this policy aims to increase the number of homes across Harrow, as well as to ensure the right size, type and tenure. Specific focus will be on the provision of family homes and those to meet the needs of an ageing population, as well as ensuring genuine affordability for local people. New housing should be well designed to address the changing needs of its occupant (i.e. adaptable), so that they can live independently within their existing residence. Further it seeks to increase the delivery of specialist types of older people accommodation (including low cost rented affordable units) and care homes. The council will monitor the supply to additional older person accommodation to address local needs. Over the plan period the Council seeks to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be genuinely affordable to low-income groups those in need, based on assessment of local housing costs and incomes, in line with the London Plan. The delivery of a higher proportion of low cost rented housing, that are considered to be genuinely affordable to local residents, will be favoured over intermediate products. Gypsy and traveller accommodation and housing for

Potential Cumulative Effects Identified

IIA3 and IIA6: This policy encourages development to be focused into areas which have existing good access to local services and facilities. This policy could work in combination with Chapter 10 of this Plan (specifically policy MT1), Policy HO1 and the London Mayor's Transport Strategy (MTS) to ensure there is good access to services via active and sustainable transport modes throughout the Borough. Therefore, a potential positive cumulative effect has been noted for objectives IIA3 and IIA6.

Mitigation

Enhancements

IIA13: The explicit mention of avoiding greenfield land where possible for future housing development could help to enhance the potential effect for IIA13.

Policy/Alternative name	HO1 Dwelling Size Mix
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out the housing size and mix over the plan period, with 25% of residential development required for families to meet an identified need within the Borough.
Assumptions Made	None.

IIA framework		Assessment										
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?		Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy requires the focusing of development in areas with a higher PTAL score (3-6) and considers the need to ensure housing for the elderly and families is located on lower floors in flatted developments to ensure ease of access to homes and nearby amenity spaces. Therefore, an indirect minor positive effect is recorded.	Yes		The inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy requires the focusing of development in areas with a higher PTAL score (3-6) and considers the need to ensure housing for the elderly and families is located on lower floors in flatted developments to ensure ease of access to homes, private gardens and nearby amenity spaces. These measure could help to increase accessibility of outside spaces for future residents, particularly those that are disabled, elderly or have mobility requirements, and therefore increasing quality of life and wellbeing. Thus, a minor positive effect is recorded.	No		The inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.
	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?	No										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing											
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Significant Positive	Policy HO1 could help to meet several of the sub-objectives for IIA5, as housing of a mix of sizes will be provided (with a focus on family homes to meet an identified shortfall), range of tenures, and prioritises the needs of those with accessibility difficulties in flatted developments. These measures should help to meet the identified housing need within the Borough, hence a potential significant positive effect has been identified.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	Yes										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Medium	Medium/Long	Borough Wide	Permanent/Reversible	Minor Positive	Whilst this policy will not directly increase public or active travel routes, the focussing of development in town centre areas or area with higher PTAL scores and intensification of development in areas which are most accessible could indirectly assist in increasing sustainable travel habits of future residents.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultra low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	No										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										



	Protect sites of geological importance?	No										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Criterion 1b(ii) of this policy requires consideration of local context and character when determining housing mix. This could help to ensure existing historic character and townscape are maintained, hence a potential minor positive effect has been identified.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?		Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Criterion 1b(ii) of this policy requires consideration of local context and character when determining housing mix. This could help to ensure existing townscape character maintained, hence a potential minor positive effect has been identified.	No		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA5: Policy HO1 could help to meet several of the sub-objectives for IIA5, as housing of a mix of sizes will be provided (with a focus on family homes to meet an identified shortfall), range of tenures, and prioritises the needs of those with accessibility difficulties in flatted developments. These measures should help to meet the identified housing need within the Borough, hence a potential significant positive effect has been identified.

Potential Cumulative Effects Identified

IIA3 and IIA6: This policy encourages development to be focused into areas which have existing good access to local services and facilities. This policy could work in combination with Chapter 10 of this Plan (specifically policy MT1), Policy HO1 and the London Mayor's Transport Strategy (MTS) to ensure there is good access to services via active and sustainable transport modes throughout the Borough. Therefore, a potential positive cumulative effect has been noted for objectives IIA3 and IIA6.

Mitigation

Enhancements

IIA3: The inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.  
IIA4: The inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.

Policy/Alternative name	HO2 Conversion and redevelopment of larger dwellings
Chapter	Chapter 04: Housing
Policy/alternative description	To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of larger homes into smaller self-contained residential units (C3) where certain criteria are met, such as the retaining of family-sized space and consideration of local townscape.
Assumptions Made	None.

IIA framework		Assessment										
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy requires the focusing of development in areas with a higher PTAL score (3-6) which should ensure residents have good access local facilities and services, including public transport. The policy also considers the need to ensure ground floor flats are designed with those with physical disabilities and elderly residents in mind. This could help to ensure ease of access to homes and nearby amenity spaces for all future residents. Therefore, an indirect minor positive effect is recorded.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?	Yes										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	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?	Yes	Direct	Low	Medium/Long	Localised	Permanent/Reversible	Minor Positive	This policy requires conversions to ensure all homes are dual aspect, with privacy, daylight and exposure to external noise. These factors will contribute to ensuring the health and wellbeing of residents is maintained. The focusing of development in areas with a higher PTAL score (3-6), which could indirectly help to ensure future residents are able to utilise active travel such as cycling. Therefore, an overall minor positive effect has been recorded.	No		It is suggested the criterion 3e is reworded from "a satisfactory environment in terms of..." to "achieve an excellent environmental in relation to...", as this could help to ensure proposal aspire to achieving the best living conditions for future residents.
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Significant Positive	Policy HO2 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs. In addition, floorspace requirements should help to retain family sized homes, thus meeting the identified need for family homes within the Borough. Accessibility is also a requirement, particularly for ground floor flats, which should be adaptable for elderly or physically disabled residents. A potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the small number of conversions likely to occur from total residential development.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	Yes										
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Medium	Medium/Long	Borough Wide	Permanent/Reversible	Minor Positive	Whilst this policy will not directly increase public or active travel routes, the focussing of development in areas with higher PTAL scores and intensification of development in areas which are most accessible could indirectly assist in increasing sustainable travel habits of future residents.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO2 contains a specific criterion (2e) which requires conversion developments to ensure there is adequate light, with limited noise exposure.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change:	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)?	No	Indirect	Low	Medium	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA8 as it highlights that development proposals should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 3-6 with good access to public transport, local services and facilities). This promotes the use of sustainable modes of transport. Additionally, Criterion 2i of Policy HO2 includes a requirement for	No		
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										

To reduce the borough's contribution towards the emission of climate change gases	Minimise greenhouse gas emissions?	Yes								Additionaly, criterion 2 of policy HO2 includes a requirement for conversions to provide parking on-site in order to avoid more on street parking. Whilst this could be seen to be encouraging car use, parking provision will be in line with the Parking policy (Policy M2) and by providing off-street parking, it may facilitate the installation of electric charging points. Overall, a minor positive effect is identified.			
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
Protect sites of geological importance?	No												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Indirect	Low	Medium/L ong	Localised	Permanent/Reversible	Minor Positive	An indirect minor positive effect has been identified for IIA11, as policy HO2 requires conversions to retain existing entrances to dwellings where possible, and ensure external alterations of not detract from the appearance of properties. In areas with strong heritage character, this could help to maintain the current setting.	No			The addition of explicit text which requires the consideration of the local historic environment could help to further improve the score for IIA13.
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Reversible	Minor Positive	Policy HO2 contains a number of criteria which should help to ensure conversions are undertaken in a sympathetic manner to the existing townscape, through careful design. For example, criteria 3h and 3i require external alterations and landscaping fits in with the current street setting.	No			
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO2 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to encourage the redevelopment of previously developed land, whilst also increasing the number of homes within the Borough - thus avoiding the need to develop on as much greenfield land. Therefore, an indirect minor positive effect has been identified.	No			
	Avoid development of greenfield land?	Yes											
	Promote the efficient use of minerals?												
	Protect soil quality and avoid soil pollution?												
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?												
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?												
Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?													
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO2 requires conversions to retain space for waste and recycling, and also allows for the redevelopment of existing buildings into multiple homes rather than demolition.	No			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA5: Policy HO2 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs. In addition, floorspace requirements should help to retain family sized homes, thus meeting the identified need for family homes within the Borough. Accessibility is also a requirement, particularly for ground floor flats, which should be adaptable for elderly or physically disabled residents. A potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the small number of conversions likely to occur from total residential development.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA4:It is suggested the criterion 3e is reworded from "a satisfactory environment in terms of..." to "achieve an excellent environmental in relation to...", as this could help to ensure proposal aspire to achieving the best living conditions for future residents.  
IIA11:The addition of explicit text which requires the consideration of the local historic environment could help to further improve the score for IIA13.

Policy/Alternative name	Policy HO3 Optimising the use of small housing sites
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out the conditions under which small sites could be developed for new homes, and the standards new homes should meet.
Assumptions Made	None.

IIA framework			Assessment									
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	Whilst this policy will not produce additional services or facilities, it does require small development to be located within close proximity of public transport and town centres, both of which are likely to increase the accessibility of such services for future residents. Therefore an indirect minor positive effect has been recorded.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	Yes										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The focusing of development in areas with a higher PTAL score (3-6) and within 800m of Metropolitan, Major or Town Centres, could indirectly help to ensure future residents are able to utilise active travel such as walking. This could also help to ensure access to facilities and services required to maintain good wellbeing. Therefore, an overall minor positive effect has been recorded.	No		
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	Policy HO3 aims to ensure small sites (less than 0.25ha) optimise potential housing delivery. This should help to maximise the number of homes delivered within the Borough, helping to meet housing needs. Therefore a potential minor positive effect has been recorded.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	Yes										
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	Whilst this policy will not directly increase public or active travel routes, the focussing of development in areas with higher PTAL scores and intensification of development in areas which are most accessible could indirectly assist in increasing sustainable travel habits of future residents.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA8 as it highlights that development proposals should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 3-6 with good access to public transport, local services and facilities). This promotes the use of sustainable modes of transport. Additionally, Criterion 3d of Policy HO3 includes a requirement for conversions to provide parking on-site in order to avoid more on street parking. Whilst this could be seen to be encouraging car use, parking provision will be in line with the Parking policy (Policy M2) and by providing off-street parking, it may facilitate the installation of electric charging points. Therefore, a potential minor positive effect is recorded.	No		
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes										
	Promote a low carbon local economy?	Yes										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	Yes										
IIA9 Adaptation to Climate Change:	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										

Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	Direct	Low	Medium (10yrs)	Localised	Temporary/Reversible	Minor Positive	Criterion 3e of Policy HO3 requires future development on small sites to "Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening". This could help to maintain or increase the current habitats within the Borough, expanding the green infrastructure network, hence a potential minor positive effect has been identified.	Yes		To further enhance the potential positive effect identified, the expansion of criterion 3e to consider connections with adjoining sites or expansion of existing GI on those could help to increase the network of habitats within the Borough.
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	Yes										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	Yes										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No										
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage led regeneration?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	Criterion 3a requires small housing sites to take a character led approach to design, which could help to ensure that the current landscape and townscape are conserved. Where trees are currently present, this could help to ensure they remain part of the built environment, hence a potential minor positive effect has been identified.	No		
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes										
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No										
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage new developments to provide adequate space for waste separation?	No										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

IIA10: There is potential for a positive cumulative effect to result from the implementation of Policies HO3: Optimising the use of small housing sites and G13: Biodiversity in relation to IIA10 (biodiversity). Both policies require the protection and enhancement of biodiversity and green infrastructure, with additional requirements around BNG within G13. This should help to ensure biodiversity is considered throughout all small housing site developments.

Mitigation

Enhancements

IIA10: To further enhance the potential positive effect identified, the expansion of criterion 3e to consider connections with adjoining sites or expansion of existing GI on those could help to increase the network of habitats within the Borough.

Policy/Alternative name	Policy HO4 Genuinely Affordable Housing
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out the affordable housing requirement for the Borough, including details of the mix of tenure and achievement of mixed communities.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework						Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	Indirect	Medium	Medium/long	Borough wide	Permanent/Irreversible	Minor positive	The provision of affordable housing within the Borough will support the ability of employers to fill vacancies and allow people to live and work within the Borough.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	Yes										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	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?	No										
	Increase and improve opportunities for active travel including walking and cycling?	No										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct/ Indirect	High	Medium/long	Borough wide	Permanent/Irreversible	Significant positive	There is potential for a significant positive effect to arise from the implementation of Policy HO4: Genuinely Affordable Housing, as the policy stipulates developments of 10 or more homes will be required to provide 50% affordable housing. Proposals must ensure an initial minimum of 35% of all gross units delivered within a scheme are affordable housing (and comply with criteria of Policy H5 C) to apply the fast track route. Review mechanisms will be utilised to maximise the delivery of affordable housing on major developments, however where a public sector land owner has an agreement with the Mayor to deliver at least 50 per cent across their portfolio of sites, then the 35 per cent threshold should apply to individual sites. The Council will prioritise the delivery of social rented housing as these are considered to be the most genuinely affordable. There are some criteria which allow for developments not to provide affordable housing, for example where it can be proven that this would create an unviable development. This could help to ensure that affordable housing is achieved in as many developments as possible, but does create flexibility regarding the total delivery of affordable housing. In cases such as these, market housing would be provided which will still support the achievement of this IIA objective and therefore a potential significant positive effect is identified.	No		Further details of the potential sites for development and numbers of affordable dwellings they could provide would help to reduce uncertainty regarding affordable housing provision.
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	Yes										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
<b>IIA9 Adaptation to Climate Change:</b>	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		



Policy/Alternative name	Policy H05 Housing Estate Renewal and Regeneration
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out the criteria for regeneration of existing estates within the Borough, including details of design, housing tenure and size and facilities.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		The policy should make it clearer that quality improvements would be sought to remaining amenity space.
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Significant positive	The purpose of estate regeneration is usually to achieve a better living environment for residents which supports this IIA objective. This policy allows for the net loss of external amenity space through criterion H. It does not require the alternative provision or contribution to provision elsewhere, but it does require consideration to quantity and quality lost and gained as part of the proposal. Criterion K requires estate regeneration schemes to provide facilities and spaces "to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living". Based on criterion K, an overall potential significant positive effect is identified.	No			
	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?	Yes											
	Increase and improve opportunities for active travel including walking and cycling?	Yes											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes											
	Increase provision of private amenity space?												
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?												
	Ensure all representative groups will be consulted and engaged with?												
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Medium	Long (20+yrs)	Borough Wide	Permanent/Irreversible	Significant positive	This policy could help to improve the design and quantity of housing available within the Borough by regenerating estates, providing affordable housing and family sized homes through the intensification of development. The quality of housing could also be improved through the regeneration of estates which are currently aged, not fit for purpose and without energy efficient heating. The policy protects the right to return for existing residents. Therefore a potential significant positive effect has been recorded.	No			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes											
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes											
	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?	Yes											
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Significant Positive	Criterion J of Policy H05 requires future regeneration schemes to ensure there is good access to the site for cyclist and pedestrians, as well as links to public transport. These should help to ensure future residents utilise sustainable travel modes wherever possible	No			The addition of ensuring public transport access through the developments as a consideration could further enhance the positive effect identified. E.g. are there bus stops within/on the outskirts of the development.
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes											
	Improve existing cycling and walking network and provide new routes?	Yes											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	Yes	Indirect	Medium	Medium/Long	Localised	Permanent/Reversible	Minor Positive	Policy H05 requires estate regeneration to consider links to public transport and an active travel modes such as cycling. This could encourage low carbon travel. The regeneration of older estates could also help to ensure homes are built to higher energy efficiency and low carbon standards.	No			The inclusions of low carbon and energy efficient design within regeneration proposals could be included within this policy to further improve the potential positive effect identified.
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes											
	Promote a low carbon local economy?	Yes											
	Ensure new developments are energy efficient?	Yes											



Emission of climate change gases	Minimise greenhouse gas emissions?	Yes											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi natural habitats?	Yes											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	Yes											
	Provide new or improved access to greenspaces?	Yes											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes											
Protect sites of geological importance?	Yes												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Long (20+yrs)	Borough Wide	Permanent/Reversible	Minor Positive	Implementation of Policy HO5 could help to increase the density of development and improve the quality of housing within the Borough, thus maintaining current residential areas and protecting Green Belt and Metropolitan Open Land from development.	No			
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy encourages the redevelopment of existing estates in order to meet the identified housing need within the Borough. Therefore a minor positive effect has been recorded.	No			
	Avoid development of greenfield land?	Yes											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	It is unclear from this policy if additional waste will be created from the redevelopment of existing estates, as it does not currently include a reference to the reuse of materials where possible. However, Local Plan Policy 09: Managing Waste and Supporting the Circular Economy does require developments to address waste management at all stages of a development's life from the design and construction stages through to the end use and activity on site.	No			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes											
	Ensure waste is dealt with in line with circular economy principles?	Yes											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA4: The purpose of estate regeneration is usually to achieve a better living environment for residents which supports this IIA objective. This policy allows for the net loss of external amenity space through criterion H. It does not require the alternative provision or contribution to provision elsewhere, but it does require consideration to quantity and quality lost and gained as part of the proposal. Criterion K requires estate regeneration schemes to provide facilities and spaces "to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living". Based on criterion K, an overall potential significant positive effect is identified.

IIA5: This policy could help to improve the design and quantity of housing available within the Borough by regenerating estates, providing affordable housing and family sized homes through the intensification of development. The quality of housing could also be improved through the regeneration of estates which are currently aged, not fit for purpose and without energy efficient heating. The policy protects the right to return for existing residents.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA3: The policy should make it clearer that quality improvements would be sought to remaining amenity space.

IIA6: The addition of ensuring public transport access through the developments as a consideration could further enhance the positive effect identified. E.g. are there bus stops within/on the outskirts of the development.

IIA8: The inclusions of low carbon and energy efficient design within regeneration proposals could be included within this policy to further improve the potential positive effect identified.

Policy/Alternative name	Policy HO6 Accommodation for Older People
Chapter	Chapter 04: Housing
Policy/alternative description	Policy HO6 sets out the requirements for future older people accommodation, including the need to ensure access to public transport, local facilities, as well as wheelchair accessible accommodation. A mix of older people accommodation is encouraged, including affordable housing.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework						Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Significant Positive	Policy HO6: Accommodation for Older People requires design issues to be considered and addressed to ensure the development is suitable for the intended occupier; for example, the policy requires higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards will be required for specialist older person accommodation. All rooms that will be utilised by visiting healthcare or other professionals should be wheelchair accessible. The policy also requires development for older people is "easily accessible to public transport (PTAL 3-6), shop, services, community facility (including health) appropriate to the needs of the intended occupiers". Whilst this will not produce additional services or facilities, it is likely to increase the accessibility of such services for future residents. Therefore, a potential significant positive effect has been identified for IIA6, although it is noted that this is of low magnitude due to the specific nature of the policy.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?											
	Ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled, elderly, families with children?	Yes										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The focusing of development in areas with a higher PTAL score (3-6) and nearby to shops, services and community facilities could indirectly help to ensure future residents are able to utilise active travel such as walking. This could also help to ensure access to facilities and services required to maintain good wellbeing. The policy also requires the use of good design and provision of outdoor amenity space for people to mix and meet. Therefore, an overall minor positive effect has been recorded,	No		
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	Yes										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Significant Positive	Policy HO6 will directly provide housing for older people in a coordinated manner, ensuring there is adequate provision alongside staff, with affordable housing contained within. Designs will also need to provide wheelchair accessibility in at least 10% of dwellings, rising to 100% of habitable rooms in care homes. Therefore, a potential significant positive effect has been identified for IIA6, although it is noted that this is of low magnitude due to the specific nature of the policy.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	Yes										
	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?	Yes										
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Whilst this policy will not directly increase public or active travel routes, the focussing of development in areas with higher PTAL scores, in areas which are most accessible could assist in increasing sustainable travel habits of future residents.	No		The inclusion of wording within this policy to ensure existing or increase accessibility to public transport for older people could help to further the positive effect identified.
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO6 encourages the provision of charging points for mobility scooters and directs development into areas with a PTAL score of 3-6, thus residents will be encouraged to use sustainable transport modes. This could help to lower emissions within the Borough.	No		
	Support the shift towards usage of electric and ultralow emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	Yes										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										

change including flood risk, extreme weather and reduced	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No													
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No													
	Conserve, enhance and repair natural and semi-natural habitats?	No													
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No													
	Achieve biodiversity net gain (BNG) in new developments?	No													
	Provide new or improved access to greenspaces?	No													
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No													
	Protect sites of geological importance?	No													
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Maintain and enhance access to cultural heritage assets?	No													
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No													
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No													
	Improve the condition of the historic environment?	No													
	Encourage heritage-led regeneration?	No													
	Help provide solutions to those assets on the Heritage at Risk register?	No													
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No													
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Promote high quality and contextually successful design?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No													
	Protect sensitive areas and protected views?	No													
	Safeguard landscape and townscape features such as trees?	No													
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No													
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Avoid development of greenfield land?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
	Promote the efficient use of minerals?	No													
	Protect soil quality and avoid soil pollution?	No													
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No													
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No													
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No													
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral				The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No	
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No													
Ensure waste is dealt with in line with circular economy principles?	No														
Safeguard existing waste management sites?	No														

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA3: Policy HO6: Accommodation for Older People requires design issues to be considered and addressed to ensure the development is suitable for the intended occupier; for example, the policy requires higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards will be required for specialist older person accommodation. All rooms that will be utilised by visiting healthcare or other professionals should be wheelchair accessible. The policy also requires development for older people is "easily accessible to public transport (PTAL 3-6), shop, services, community facility (including health) appropriate to the needs of the intended occupiers". Whilst this will not produce additional services or facilities, it is likely to increase the accessibility of such services for future residents. Therefore, a potential significant positive effect has been identified for IIA6, although it is noted that this is of low magnitude due to the specific nature of the policy.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA6: The inclusion of wording within this policy to ensure existing or increase accessibility to public transport for older people could help to further the positive effect identified.

Policy/Alternative name	Policy HO7 Supported and Sheltered Housing
Chapter	Chapter 04: Housing
Policy/alternative description	Policy HO7 sets out the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups
Assumptions Made	None.

IIA objective	IIA framework								Assessment				
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the provision of world-class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Significant positive	Policy HO7 sets out that new provision of sheltered and supported accommodation should be located within close proximity to shops, services and facilities which future residents may require, as well as public transport. It also makes provision for the conversion of existing dwellings to be the right size and type for the intended user, such as by adapting homes for those with specific needs. These measures should help to ensure that future residents with disabilities and other needs are able to locate suitable housing within the Borough.	No			
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	Yes											
	Avoid an adverse / discriminatory impact on protected characteristics/equality groups?	Yes											
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?	Yes												
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO7 sets out that new provision of sheltered and supported accommodation should be located within close proximity to shops, services and facilities which future residents may require, as well as public transport. This could help residents to stay in their current homes rather than move on to alternative accommodation. These measures should help to ensure that future residents are able to lead healthy lives with good wellbeing.	No		The inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing could help to maximise the potential positive effect identified.	
	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?	Yes											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
Ensure all representative groups will be consulted and engaged with?	No												
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	Policy HO7 will help to provide supported and sheltered housing for vulnerable and disadvantaged groups, in locations with good access to local transport, shops and services. However, it is noted that although criterion 2 aims to resist/prevent losses of accommodation and sets a high bar for allowing loss of such uses, it does allow for the loss of such accommodation and overall minor positive effect has therefore been recorded rather than a significant positive effect.	No		The inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing could help to maximise the potential positive effect identified.	
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	Yes											
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No												
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Whilst Policy HO7 will not directly increase public transport, the focussing of development in areas with easy access to public transport, shops and services could assist in increasing sustainable travel habits of future residents.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultra low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
Conserve and/or enhance heritage assets, historic environment, and their settings?	No												
		No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the	No			

IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Maintain and enhance access to cultural heritage assets?	No								IIA objective. Therefore a neutral effect is predicted.		
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No								The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No	
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral				
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No								Criterion 3 of Policy HO7 supports the adaptation of existing dwellings to ensure suitable housing is available for residents with disabilities and specific needs. This could help to ensure dwellings are modified rather than demolished or entire new homes are built, hence a minor positive effect has been identified for IIA13.	No	
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive				
	Avoid development of greenfield land?	Yes										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
IIA14 Waste: To minimise waste.	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No								The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No	
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA3: Policy HO7 sets out that new provision of sheltered and supported accommodation should be located within close proximity to shops, services and facilities which future residents may require, as well as public transport. It also makes provision for the conversion of existing dwellings to be the right size and type for the intended user, such as by adapting homes for those with specific needs. These measures should help to ensure that future residents with disabilities and other needs are able to locate suitable housing within the Borough.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA4: The inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing could help to maximise the potential positive effect identified.  
 IIA5: The inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing could help to maximise the potential positive effect identified.

Policy/Alternative name	Policy HO8 Purpose Built Student Accommodation
Chapter	Chapter 04: Housing
Policy/alternative description	This policy sets out criteria for the development of Purpose-Built Student Accommodation (PBSA) within the Borough, including elements of design and accessibility.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework						Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy indirectly supports the achievement of IIA1 as students can encourage economic regeneration in the areas they are located in, which supports the vitality/viability of town centres. The presence of students can also make the Borough attractive for new businesses, as they bring a large pool of skilled labour. Therefore, a potential indirect minor positive effect is identified.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO8 sets out that new provision of student accommodation should be located within close proximity to shops, services and facilities which future residents may require. This could help to ensure future students are able to access the services they require.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO8 sets out that new provision of student accommodation should be located within close proximity to shops, services and facilities which future residents may require. It is also noted that criterion 1c requires developers to confirm a need for purpose-built student accommodation with a high education provider and evidence this prior to development. Therefore, a potential minor positive effect is identified.	No		Include the provision of amenity space as a requirement of the policy and cross reference to policy GI2 Open Space.
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	Yes										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO8 will help to deliver student accommodation within the Borough over the lifetime of the plan, the design of which will have to consider access to local services and facilities and deliver a range of accommodation types. This will help to meet the housing needs of the Borough although the need for student housing has not been identified as high within the draft Housing Needs Assessment (September 2022). A potential minor positive effect has been identified.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Policy HO8 encourages the development of student accommodation in areas with good access to services and facilities, on the edge of town centres. This could intensify student accommodation in existing areas, reducing the need for future residents to travel.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										

IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		The inclusion of a link to the Green Infrastructure chapter or reference to the need for green infrastructure provision in around student accommodation could help to create a potential positive effect for IIA10.
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	No										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage led regeneration?	No										
	Help provide solutions to those assets on the Heritage at Risk register?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes										
	Ensure waste is dealt with in line with circular economy principles?	Yes										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA4:Include the provision of amenity space as a requirement of the policy and cross reference to policy G12 Open Space.  
IIA10:The inclusion of a link to the Green Infrastructure chapter or reference to the need for green infrastructure provision in around student accommodation could help to create a potential positive effect for IIA10.

Policy/Alternative name	H09 Large Scale Purpose Built Shared Living
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	The policy outlines how large scale purpose built shared living (LSPBSL) will be considered in development proposals. Proposals should comply with Policy H16 of the London Plan and will be assessed against a set of criteria, including how the development meets identified local housing need, as well as provides affordable housing contributions.
Assumptions Made	None.

IIA objective	IIA framework				Assessment							
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA1 as it highlights that proposals for the development of LSPBSL schemes should be located within the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre, that form part of the Opportunity Area. This is because the area is considered the most sustainable location for accessing public transport, local services, facilities and pursuing employment opportunities. Developments must also provide some flexible workspace within the ground floor. This will provide some workspace for the internal and external residents, as well as help create commercial networks, attract investment, boost economic growth and help achieve the Borough's economic objectives. Therefore, a potential minor positive effect is recorded.			
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	Yes										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes											
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as it highlights that proposals for the development of LSPBSL schemes must provide some flexible workspace within the ground floor. This will provide some workspace for the internal and external residents, as well as create additional jobs. Therefore, a potential minor positive effect is recorded.			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? oeducation facilities? ohealth services?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA3 as it highlights that proposals for the development of LSPBSL schemes should be well designed and highly accessible, to meet needs of all users. Additionally, proposals for LSPBSL schemes should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 5-6 with good access to public transport, local services and facilities). Finally, the development of the LSPBSL scheme should not have a detrimental impact to the need to support and maintain mixed and inclusive communities, or on the amenity of neighbouring properties. Therefore, a potential minor positive effect is recorded.			
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes										
	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?	Yes										
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that proposals for the development of LSPBSL schemes must include public amenities (e.g. restaurants, cafes, leisure facilities), where suitable on the ground floor of the development, that are accessible to the wider public. This will provide areas for residents to mix and meet. Developments must also provide living spaces that benefit the health and wellbeing of residents through design and accessibility, in accordance with London Plan Guidance. The LPG highlights that LSPBSL schemes should have well-designed internal/external communal amenity space/facilities to encourage interaction between residents, and benefit their health and wellbeing. For example, each personal room should include a window, with an adequate level of natural sunlight and ventilation. Finally, proposals must demonstrate satisfactory servicing arrangements (for deliveries, waste management and emergency vehicle) and there are no adverse impacts on the safe operations of the highway network. Therefore, a potential minor positive effect is recorded.			
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	No										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the provision of LSPBSL schemes, which will contribute to the number of additional homes being delivered within the Borough, although this accommodation will not contribute to addressing local housing needs which are for self contained housing and family sized housing. The policy highlights that proposals for the development of LSPBSL schemes will require affordable housing contributions, in line with London Plan Policy H16. The affordability of the scheme will have to be demonstrated in comparison to alternative housing products within the Harrow private rental sector. Proposals will also be required to demonstrate how they are meeting an identified local housing need, based on local incomes, rent levels and existing/future demographics of the Borough. The London Plan (2021) policies and LPG will apply to this policy to ensure that rooms and communal areas are built to accessible and adaptable standards. Where a potential overconcentration of LSPBSL schemes is identified, the development of alternative town centre use such as offices, and C1 hotels or mixed-use schemes, where appropriate will be prioritised. Therefore, a potential minor positive effect is recorded.			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	Yes										
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA6 as it highlights that proposals for LSPBSL schemes should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 5-6 with good access to public transport, local services and facilities). This promotes the use of sustainable modes of transport. Therefore, a potential minor positive effect is recorded.			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA6 as it highlights that proposals for LSPBSL schemes should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 5-6 with good access to public transport, local services and facilities). This promotes the use of sustainable modes of transport. Therefore, a potential minor positive effect is recorded.			
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No										
	Promote a low carbon local economy?	Yes										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	Yes										



IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi-natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	No										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No										
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage led regeneration?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No										
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as it highlights that proposals for the development of two or more LSPBSL schemes should not be located within a 250m distance of each other (unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses), in order to avoid a detrimental impact on the character of the surrounding area. Additionally, by locating LSPBSL schemes within the boundary of the Harrow and Wealdstone Opportunity Area in areas that have a PTAL rating of 5-6, development will not take place in areas of the Borough characterised by two-storey family housing. This will subsequently protect the Borough townscape character as LSPBSL schemes tend to be built at higher densities and are likely to require 4 or more storeys development. Therefore, a potential minor positive effect is recorded.			
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA14 as it highlights that proposals for the development of LSPBSL schemes should demonstrate that different design layouts have been considered, to enable the development to easily be converted to a different use in the future, if needed. This should encourage the efficient use of resources, reduce waste and promote the circular economy as the building can be repurposed. Therefore, a potential minor positive effect is recorded.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes										
	Ensure waste is dealt with in line with circular economy principles?	Yes										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	HO10 Housing with shared facilities (Houses in Multiple Occupation)
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	The policy outlines how Houses in Multiple Occupation (HMO) will be considered in development proposals. Proposals will be assessed against a set of criteria, including how the development does not lead to the loss of family housing, and is located in the most accessible location.
Assumptions Made	None.

IIA objective	IIA framework		Assessment							Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement										
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance															
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as it highlights that proposals for HMO developments will only be permitted providing they contribute to creating an inclusive community and would not harm the mix, balance and well-being of communities through an over-concentration of the property type. Additionally, developments should be designed with accessibility in mind; proposals must ensure all the occupants have an obstruction free, convenient access to communal amenity areas and facilities. Therefore, a potential minor positive effect is recorded.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	Yes																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that proposals for HMO developments must provide living spaces that benefit the health and wellbeing of residents through design and accessibility, in accordance with the relevant standards for HMOs in the licencing regime. For example, each personal room should include a window, with an adequate level of natural sunlight and ventilation. Additionally, adequate provision of amenity space should be made in relation to access to gardens and communal facilities/areas. Finally, adequate provision should be made for car parking and safe access to property, which does not harm the safety of other road users. Therefore, a potential minor positive effect is recorded.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		Yes																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA5 as the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough. HMOs also provide an affordable rental housing option for young and low-income individuals/couples, who would usually be priced out of the market. The policy seeks to prevent the loss of HMO developments, unless necessary for wider development. Proposals for large purpose-built HMO developments will be resisted however, as there is no indicated need for them within the Borough and they may subtract from identified housing needs (e.g.: family housing) which are difficult to replace. The location of HMO developments must be appropriately managed to ensure that they do not contribute to the potential loss of larger housing (defined as homes where the internal floor area exceeds 130m <sup>2</sup> ) in areas that are characterised by family													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes																				
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA6 as it highlights that proposals for HMO developments should be located in the most appropriate area for public transport (e.g.: areas that have a PTAL rating of 4-6 with good access to public transport, local services and facilities). This promotes the use of sustainable modes of transport. Therefore, a potential minor positive effect is recorded.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA8 as it highlights that proposals for developments should be located in the most appropriate locations for public transport (PTAL 4-6). This could encourage the use of sustainable/low carbon modes of travel, leading to a reduction in transport derived emissions across the Borough. Therefore, a potential minor positive effect is recorded.														
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	Yes																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Indirect	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA9 as it highlights that proposals for HMO developments should be located in the most appropriate locations for public transport (PTAL 4-6). This indirectly reduces the need for hard landscaping (e.g.: areas for car parking) which often results in a heightened flood risk. Therefore, a potential														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	Indirect	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA10 as it highlights that proposals for HMO developments should be located in the most appropriate locations for public transport (PTAL 4-6). This indirectly benefits biodiversity as it reduces the need for hard landscaping (e.g.: areas for car parking) which often results in a loss of biodiversity through the removal of habitats. Therefore, a potential minor positive effect is recorded.														
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes																					
	Achieve biodiversity net gain (BNG) in new developments?	Yes																					
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage led regeneration?	No										
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA12 as it highlights that proposals for HMO developments should not harm the character of the area or the amenity of neighbouring properties. Where developments are proposed on residential streets or areas characterised by family housing, they will be refused as to not disrupt the character of the area, such as relating to the loss of front gardens for parking and bin storage areas. Therefore, a potential minor			
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes										
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
<b>IIA14 Waste:</b> To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA14 as it highlights that proposals for HMO developments should make adequate provision for the storage and collection of waste and recycling material generated by residents. Therefore, a potential minor positive			
	Encourage new developments to provide adequate space for waste separation?	Yes										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA5: The policy supports the achievement of objective IIA5 as the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough. HMOs also provide an affordable rental housing option for young and low-income individuals/couples, who would usually be priced out of the market. The policy seeks to prevent the loss of HMO developments, unless necessary for wider development. Proposals for large purpose-built HMO developments will be resisted however, as there is no indicated need for them within the Borough and they may subtract from identified housing needs (e.g.: family housing) which are difficult to replace. The location of HMO developments must be appropriately managed to ensure that they do not contribute to the potential loss of larger housing (defined as homes where the internal floor area exceeds 130m<sup>2</sup>) in areas that are characterised by family housing. Therefore, as long as LSPBSL schemes are developed, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	HO11 Self-build and Custom-build Housing
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	The policy outlines how Self- and Custom-Build development proposals are considered. Proposals will be assessed against a set of criteria, including how the development considers the provision of affordable and family housing.
Assumptions Made	Development is in accordance with policies relating to matters and other relevant Development Plan Policies.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA Framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Indirect	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA3 as support for the development of self- and custom-build homes means that individuals can design homes that are exactly suitable to their own needs, making them as accessible and inclusive as required. Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	Yes											
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
	Increase the number of additional homes delivered to meet local needs/targets?	Yes											
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes											
	Provide affordable homes of the tenure and size to meet the identified needs?	Yes											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
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?	No												
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as the provision for self- and custom-build homes will contribute to the number of additional homes being delivered within the Borough. Self- and custom-build homes will be supported where there is an identified need on the Harrow self-build and custom housebuilding register. The policy makes provision for affordable housing, which will be required for any major self or custom built developments (e.g. 10 or above units). The Council will also work with stakeholders to bring forward potential sites to increase the delivery of family sized housing in order to address local needs. These factor also apply for proposals for community-led housing. Therefore, a potential minor positive				
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No											
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No											
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
	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)?	No											
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Promote a low carbon local economy?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No											
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
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	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid adverse effects on European designated habitats sites?	No											
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Achieve biodiversity net gain (BNG) in new developments?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Maintain and enhance access to cultural heritage assets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No											
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No											
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
	Avoid adverse effects on European designated habitats sites?	No											
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment,	Conserve, enhance and repair natural and semi-natural habitats?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											



Policy/Alternative name	HO12 Gypsy and Traveller Accommodation Needs
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	The policy outlines how Gypsy and Traveller Accommodation needs are considered. The Council aims to retain the existing site at Watling Farm, but will support proposals for new sites and pitches providing that there is an identified need. Proposals will be assessed against a set of criteria, including the adequate provision of safe access, basic amenities and measures to minimise environmental impact.
Assumptions Made	None.

IIA framework			Assessment									
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No										
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as proposals for new and replacement accommodation must ensure that sites are located in areas with reasonable access to public transport in order to easily access community facilities and services. Sites should also be designed to contribute to a wider, more inclusive neighbourhood. Therefore, a potential minor positive effect is recorded.			
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes										
	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?	Yes										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as proposals for new and replacement accommodation must ensure that sites are located in areas with reasonable access to public transport in order to easily access community facilities and services. Any new proposed sites will need to provide a safe and acceptable living environment. Proposals for new and replacement accommodation must make adequate provision for safe access to and from the site, parking and servicing arrangements for all vehicles likely to use the site. Additionally, these sites must not pose a risk to public health and safety, or adversely affect the amenity of site occupants or neighbouring pitches. Finally, proposals for new and replacement accommodation must make adequate provision for amenity space and play areas for residents. Therefore, a potential minor positive effect is recorded.			
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
	Increase the number of additional homes delivered to meet local needs/targets?	Yes										
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as it aims to retain and support that existing Gypsy and Traveller site at Watling Farm (1.07ha), in order to provide 12 additional pitches and address future traveller needs between 2022-23. There are currently two pitches on the site, and it is licenced to a single family. The site has historic permission for up to 15 pitches. Proposals for new Gypsy and Traveller sites and pitches will be supported, providing they contribute to meeting identified local needs and there is no capacity at the existing site at Watling Farm. However, it is not envisaged that an additional site will be required during the plan period unless updated evidence indicates insufficient capacity at the existing site. Therefore, as the policy supports the provision of additional homes to meet local targets, a potential minor positive effect is recorded.			
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	Yes										
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes										
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA6 as proposals for new and replacement accommodation must ensure that sites are located in areas with reasonable access to public transport in order to easily access community facilities and services. Therefore, a potential minor positive effect is recorded.			
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No										
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
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	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Support the shift towards usage of electric and ultra low emissions vehicles?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Promote a low carbon local economy?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes										
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA9 as proposals for new and replacement accommodation must take any potential flood risk and the impacts of climate change in account when decided on the location of new sites. This should help to minimise the impacts of climate change on Gypsy and Traveller pitches and sites. Therefore, a potential minor positive effect is recorded.			
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										

<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>	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy highlights that proposals for new and replacement accommodation must incorporate adequate landscaping and planting, which may provide benefits for biodiversity in the area. The policy also states that proposals should include measures to minimise any impacts of policy designations on adjacent Sites of Important Nature Conservation (SINCs). This should subsequently protect biodiversity. Therefore, a potential minor positive effect is recorded.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi-natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes										
	Achieve biodiversity net gain (BNG) in new developments?	Yes										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
Protect sites of geological importance?	No											
<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
	Help provide solutions to those assets on the Heritage at Risk register?	No										
<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as proposals for new and replacement accommodation must make adequate provision for the character of the area, including visual and amenity considerations. For example, appropriate landscaping and planting should be carried out to enable integration of the site with the surrounding environment. Therefore, a potential minor positive effect is recorded.			
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
		No										
<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>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA13 as the policy highlights that proposals for new and replacement accommodation must make adequate provision for basic amenities such as running water and sewerage. The policy also states that proposals should include measures to minimise any impacts of policy designations on adjacent Green Belt. This should subsequently protect areas of Green Belt in the Borough. Therefore, a potential minor positive effect is recorded.			
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	Yes										
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA14 as proposals for new and replacement accommodation must make adequate provision for basic amenities such as waste management. Therefore, a potential minor positive effect is recorded.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										
		No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 04: Local Economy
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how economic developments, and the provision of employment floorspace, are considered. Proposals will be assessed against a set of criteria, including support for town centre development, providing a range of uses, and employment.
Assumptions Made	None.

IIA objective	IIA framework			Assessment																			
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Long (20+yrs)	borough Wide	Permanent/Irreversible	Significant Positive	The policy focuses on the provision of sufficient employment floorspace, in order to produce a strong and adaptable economy, whilst positively contributing to the wider London economy. Proposals for development that contribute to the vitality and viability of the local economy will be supported. This includes developments that are appropriately located and support the hierarchy of town centres and provide a range of uses; flexible floorspace / premises should be provided to allow for multiple uses that can contribute to both daytime and night-time economies. This would support economic growth in town centres by will continuing or increasing the level of footfall. Developments that support the intensification and modernisation of industrial floorspace and premises will be prioritised. Use Class B2, B8 and related Sui Generis Industrial Uses should be prioritised into Strategic Industrial Land & Locally Significant Industrial Sites whereas Use Class E(g) (ii) & (iii) activities should be located in appropriate locations outside of SIL and LSIS premises. Existing industrial spaces should be protected. Therefore, a potential significant positive effect is recorded.														
	Support the provision of world class infrastructure and connectivity?	Yes																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes																					
	Safeguard existing town centres?	Yes																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Reversible	Significant Positive	The policy supports the achievement of objective IIA2 as it highlights that new development should benefit local business through local labour (employment, skills development, apprenticeships and other training initiatives) and supply chain opportunities. The Council's Economic Development team provides a programme to support developers to bring provide opportunities for local labour to work on apprentices on major developments.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	Yes																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	Yes	N/A	N/A	N/A	N/A	N/A	Uncertain	The policy supports the provision of housing by supporting mixed use development schemes. There is potential for a positive effect to be recorded for IIA5, however as it is not clear how many homes will be provided by mixed use development schemes, an uncertain effect is predicted.			The policy should expand on the benefits mixed use development schemes could bring to housing development.										
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																						
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
	Achieve biodiversity net gain (BNG) in new developments?	No																					
	Provide new or improved access to greenspaces?	No																					



Special and Functional Needs	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

**Significant Negative and Uncertain Effects**

IIA5: The policy supports the provision of housing by supporting mixed use development schemes. There is potential for a positive effect to be recorded for IIA5, however as it is not clear how many homes will be provided by mixed use development schemes, an uncertain effect is predicted.

**Significant Positive Effects**

IIA1: The policy focuses on the provision of sufficient employment floorspace, in order to produce a strong and adaptable economy, whilst positively contributing to the wider London economy. Proposals for development that contribute to the vitality and viability of the local economy will be supported. This includes developments that are appropriately located and support the hierarchy of town centres and provide a range of uses; flexible floorspace / premises should be provided to allow for multiple uses that can contribute to both daytime and night-time economies. This would support economic growth in town centres by will continuing or increasing the level of footfall. Developments that support the intensification and modernisation of industrial floorspace and premises will be prioritised. Use Class B2, B8 and related Sui Generis Industrial Uses should be prioritised into Strategic Industrial Land & Locally Significant Industrial Sites whereas Use Class E(g) (ii) & (iii) activities should be located in appropriate locations outside of SIL and LSIS premises. Existing industrial spaces should be protected. Therefore, a potential significant positive effect is recorded. IIA2: The policy supports the achievement of objective IIA2 as it highlights that new development should benefit local business through local labour (employment, skills development, apprenticeships and other training initiatives) and supply chain opportunities. The Council's Economic Development team provides a programme to support

**Potential Cumulative Effects Identified**

**Mitigation**

IIA5: The policy should expand on the benefits mixed use development schemes could bring to housing development.

**Enhancements**

Policy/Alternative name	Strategic Policy 05: Harrow & Wealdstone Opportunity Area
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how development within the Harrow and Wealdstone Opportunity Area is prioritised. Proposals will be assessed against a set of criteria, including support for housing, employment opportunities and the intensification and modernisation of existing employment and industrial floorspace.
Assumptions Made	None.

IIA objective	IIA framework			Assessment							Potential for cumulative effects?	Mitigation	Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects				
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Medium/L ong	Localised	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA1 as it highlights a focus on the delivery of essential housing, employment space and infrastructure across the Harrow and Wealdstone Opportunity Area. The policy highlights that the Harrow Metropolitan Centre should be reinforced as the primary location for office, retail, evening and night-time economy, and leisure use within the Borough. More specifically, St Ann's Road, Station Road and the St George's and St Ann's primary shopping areas should be prioritised for new appropriate town centre development. Within these areas, flexible floorspace / premises should be provided to allow for multiple uses that can contribute to both daytime and night-time economies. This would support economic growth in town centres by will continuing or increasing the level of footfall. It would also support the provision of new and existing businesses within town centres. The policy also				
	Support the provision of world class infrastructure and connectivity?	Yes											
	Support flexible working practices?	Yes											
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes											
	Safeguard existing town centres?	Yes											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium/L ong	Regional	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA2 as it directs and supports the delivery of the growth potential identified in the London Plan (2021), including the delivery of a minimum 1000 jobs into the Opportunity Area, supporting employment floorspace to meet the evidenced needs of the borough and wider West London sub-region. This will contribute to the reduction in unemployment rates across				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Medium	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as it highlights a focus on the delivery of essential infrastructure to support new development across the Harrow and Wealdstone Opportunity Area. This will include the provision of education, health and recreational facilities. Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	Yes											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	Yes											
	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?	No											
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that proposals for development within Wealdstone Town Centre will be supported where they contribute to planned improvements to the public realm, including improvements to perceptions of crime and poor safety, and for safe and efficient pedestrian and cycle use. Therefore, a potential minor positive effect is recorded.				
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	Yes											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	Yes	Direct	High	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA5 as it highlights a focus on the delivery of a minimum of 5000 well designed homes within the Harrow and Wealdstone Opportunity Area. This will increase the number of additional homes delivered to meet local needs. Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Medium/L ong	Regional	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA6 as it highlights a focus on the delivery of sustainable transport modes to the Harrow and Wealdstone Opportunity Area, as well as the wider Borough and sub-region. More specifically, within Harrow Metropolitan Centre the policy aims to support proposals for development that improve pedestrian connectivity and provide car parking in line with London Plan standards, including Electric Vehicle charging points. Along Station Road, proposals should contribute to planned improvements to the public realm and road junctions, and active transport linkages between Wealdstone District Centre and Harrow Metropolitan Town Centre. Proposals for development within Wealdstone Town Centre will be supported where they contribute to improvements to the Harrow & Wealdstone Rail & Underground Station and safe/efficient pedestrian and cycle use. Therefore, a potential significant positive effect is recorded.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	Yes											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Low	Medium/L ong	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA8 as developments within Harrow Metropolitan Centre should include the provision of Electric Vehicle charging points. This should encourage more residents and tourists to utilise low carbon modes of transport, as opposed to petrol/diesel vehicles. Therefore, a potential minor positive effect is recorded.				
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA9 as developments within the Wealdstone Town Centre should contribute to planned improvements to the public realm, such as by responding to the climate change emergency (including flood risk adaptation). Therefore, a potential minor positive effect is recorded.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											

<b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA10 as developments along Station Road (linking Wealdstone District Centre and Harrow Metropolitan Town Centre) should contribute to planned improvements to the public realm and road junctions, including the creation of green boulevards. This should enhance biodiversity, by providing benefits for habitats and species. Therefore, a potential minor positive effect is recorded.
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No							
	Conserve, enhance and repair natural and semi natural habitats?	Yes							
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No							
	Achieve biodiversity net gain (BNG) in new developments?	No							
	Provide new or improved access to greenspaces?	No							
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes							
Protect sites of geological importance?	No								
<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA11 as it highlights that support will be given for proposals within the Harrow & Wealdstone Opportunity Area where new development conserves and enhances the significance of heritage assets. More specifically, proposals within Wealdstone Town Centre will be supported where developments respect and reinforce the centre's heritage and character in relation to architecture, streetscape, road layout and its relationship with the wider suburban character area. Furthermore, the policy will ensure new development conserves and enhances the significance of heritage assets, including the Harrow on the Hill Conservation area. Therefore, due to the consideration given to the historic environment, a potential minor positive effect is recorded.
	Maintain and enhance access to cultural heritage assets?	No							
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes							
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No							
	Improve the condition of the historic environment?	No							
	Encourage heritage led regeneration?	No							
	Help provide solutions to those assets on the Heritage at Risk register?	No							
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as it highlights that support will be given for developments along Station Road (linking Wealdstone District Centre and Harrow Metropolitan Town Centre) where proposals are of a scale and a high-quality design, consistent with the surrounding suburban character area. Development within the Wealdstone Town Centre will be supported when proposals respect and reinforces the centre's heritage and character in relation to architecture, streetscape, road layout and its relationship with the wider suburban character area. Therefore, due to the consideration given to landscape and townscape character, a potential minor positive effect is recorded.
	Promote high quality and contextually successful design?	Yes							
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No							
	Protect sensitive areas and protected views?	No							
	Safeguard landscape and townscape features such as trees?	No							
		No							
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Avoid development of greenfield land?	No							
	Promote the efficient use of minerals?	No							
	Protect soil quality and avoid soil pollution?	No							
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No							
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No							
Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No								
<b>IIA14 Waste:</b> To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No							
	Ensure waste is dealt with in line with circular economy principles?	No							
	Safeguard existing waste management sites?	No							

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA1: The policy supports the achievement of objective IIA1 as it highlights a focus on the delivery of essential housing, employment space and infrastructure across the Harrow and Wealdstone Opportunity Area. The policy highlights that the Harrow Metropolitan Centre should be reinforced as the primary location for office, retail, evening and night-time economy, and leisure use within the Borough. More specifically, St Ann's Road, Station Road and the St George's and St Ann's primary shopping areas should be prioritised for new appropriate town centre development. Within these areas, flexible floorspace / premises should be provided to allow for multiple uses that can contribute to both daytime and night-time economies. This would support economic growth in town centres by will continuing or increasing the level of footfall. It would also support the provision of new and existing businesses within town centres. The policy also highlight that Wealdstone Industrial Land and Premises should be modernised and intensified across all levels of the industrial land hierarchy. Therefore, a potential significant positive effect is recorded. IIA6: The policy supports the achievement of objective IIA6 as it highlights a focus on the delivery of sustainable transport modes to the Harrow and Wealdstone Opportunity Area, as well as the wider Borough and sub-region. More specifically, within Harrow Metropolitan Centre the policy aims to support proposals for development that improve pedestrian

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	LE1 Development Principles and Town Centre Hierarchy
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines the council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.
Assumptions Made	None.

IIA framework			Assessment										
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Reversible	Significant Positive	The policy supports the achievement of objective IIA1 as it supports retail, leisure and cultural development or extensions within appropriate town centres. Community facilities in town centres are able to be supported where compliant with Policy C1. This would support economic growth in town centres by continuing or increasing the level of footfall. It would also support the provision of new and existing businesses within town centres. All proposals should contribute to the vitality and vibrancy of the centre or parade. The policy resists proposals for new retail, leisure and cultural development in out of centre locations, and any such developments will need to undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites. Therefore, due to the provision of economic growth and the support provided to new and existing businesses, a potential significant positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	Yes											
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes											
	Safeguard existing town centres?	Yes											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as the provision of retail, leisure and cultural developments/extensions within town centres should provide part time and full time employment opportunities for local residents. This will contribute to the reduction in unemployment rates across the Borough. Therefore, due to the provision of employment opportunities, a potential minor positive effect is recorded.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Medium	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as it highlights that community facilities in town centres will be supported where compliant with Policy C1. The policy resists the loss of any employment, leisure or cultural uses within a neighbourhood parades, as this would reduce the accessibility of residents to essential day to day amenities. The ground floor of any employment, leisure or cultural developments would have to have an accessible and active frontage. Therefore, due to the provision of local accessibility, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	Yes											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No											
	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?	Yes											
	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?	Yes											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that support will be given for retail, leisure and cultural development or extensions within appropriate town centres where they do not harm residential amenity or the free flow and safety of the public highway. In out of centre locations, leisure developments will be only be considered providing they can prove that they are located within an identified area of deficiency or an identified area for future need. In addition, this policy states that the council will explore and seek to implement where considered appropriate the use of Article 4 Directions to support the achievement of broader health and wellbeing outcomes, specifically regarding Sui Generis uses within town centres. The policy acknowledges the potential health and wellbeing implications caused by certain shops e.g. betting shops, casinos, pawn shops, shisha bars and some food outlets. Overall, a potential minor positive effect is recorded.				
	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?	Yes											
	Increase and improve opportunities for active travel including walking and cycling?	Yes											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy indirectly supports the achievement of objective IIA6 as proposals for new retail, leisure and cultural development in out of centre locations will need to be supported by a Green Travel Plan to enhance sustainable modes of travel between the site and town centre. The policy also highlights that mixed-use developments in town centres and parades will be supported as long as there is provision serving arrangement such as cycle stores between the two uses. This should encourage use of active methods of travel. Therefore, a potential minor positive effect is recorded.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	Yes											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA7 as it highlights that support will be given for mixed-use developments in town centres and parades where they address the agent of change principle (Policy D12 of the London Plan (2021)), ensuring that new noise and other nuisance-generating development put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Therefore, as the policy aims to minimise noise pollution, a potential minor positive effect is recorded.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											

IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/Long	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as it highlights that support will be given for town centre developments that are of a scale and intensity commensurate to the size and role of the centre or parade it is located within. The council also seek to implement Article 4 Directions to ensure the vibrancy and vitality of town centres and parades. Therefore, due to the consideration given to townscape character, a potential minor positive effect is recorded.				
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Short/Medium	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA14 as it highlights that mixed-use developments in town centres and parades will be supported as long as there is a clear delineation of access and servicing arrangements (bin store) between the two uses. Therefore, as the policy aims to minimise waste, a potential minor positive effect is recorded.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA1: The policy supports the achievement of objective IIA1 as it supports retail, leisure and cultural development or extensions within appropriate town centres. Community facilities in town centres are able to be supported where compliant with Policy CI1. This would support economic growth in town centres by continuing or increasing the level of footfall. It would also support the provision of new and existing businesses within town centres. All proposals should contribute to the vitality and vibrancy of the centre or parade. The policy resists proposals for new retail, leisure and cultural development in out of centre locations, and any such developments will need to undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites. Therefore, due to the provision of economic growth and the support provided to new and existing businesses, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	LE2 Night-time and Evening Economy
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how the evening and night-time economy will be considered in development proposals inside and outside of Harrow Metropolitan Town Centre. Proposals will be assessed against a set of criteria, including how the development supports the vitality and vibrance of the town centre, and the agent of change principle.
Assumptions Made	Development is in accordance with policies relating to matters and other relevant Development Plan Policies.

IIA objective	IIA framework			Assessment									
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	High	Medium/Long	borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA1 as the development of the nighttime and evening economy helps to deliver economic growth across Harrow. Night-time economic facilities include restaurants, bars, nightclubs, shops and sporting venues. Additional nighttime economic activities include cleaning, wholesale and distribution, and transport and medical services. Support for existing, and provision of further night-time economic facilities will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy of Harrow. This will particularly be the case in Harrow Metropolitan Centre, which provides the optimal location for late night opening hours. The Council intends to produce a masterplan for the Metropolitan Town Centre, setting out where land uses, including night-time and evening economy, would be best directed to across the town centre. Therefore, due to the provision of economic growth and the support provided to new and existing businesses, a potential significant positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	Yes											
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as a strong nighttime and evening economy provides part time and full time employment opportunities for local residents. This will contribute to the reduction in unemployment rates across the Borough. Therefore, due to the provision of employment opportunities, a potential minor positive effect is recorded.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium (10yrs)	Localised	Temporary/Reversible	Minor Positive	The policy seeks to ensure that all residents are able to participate in night-time activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community. In addition, all development must seek to ensure that schemes are designed to make safer places for all people to visit, particularly for women and girls. The Council will seek to implement the Mayor of London's Violence Against Women and Girls Strategy, the Women's Night Safety Charter, and the LGBTQ+ Venues Charter where relevant to the planning process. Proposals also must be in accordance with Policy GR3 Inclusive Design. Overall, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	Yes											
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	Yes											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of the right size of housing to address local needs, particularly family-sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No												
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA7 as it highlights that support will be given for facilities related to the night-time and evening economy where they address the agent of change principle (Policy D12 of the London Plan (2021)), ensuring that new noise and other nuisance-generating development put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Therefore, as the policy aims to minimise noise pollution, a potential minor positive effect is recorded.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
	Avoid adverse effects on European designated habitats sites?	No											
			N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the				

IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Conserve, enhance and repair nationally and locally designated wildlife sites?	No								Neutral	IIA objective. Therefore a neutral effect is predicted.			
	Conserve, enhance and repair natural and semi-natural habitats?	No												
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No												
	Achieve biodiversity net gain (BNG) in new developments?	No												
	Provide new or improved access to greenspaces?	No												
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No												
	Protect sites of geological importance?	No												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No												
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No												
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No												
	Improve the condition of the historic environment?	No												
	Encourage heritage led regeneration?	No												
	Help provide solutions to those assets on the Heritage at Risk register?	No												
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Promote high quality and contextually successful design?	No												
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No												
	Protect sensitive areas and protected views?	No												
	Safeguard landscape and townscape features such as trees?	No												
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No												
	Promote the efficient use of minerals?	No												
	Protect soil quality and avoid soil pollution?	No												
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No												
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No												
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No												
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No												
	Ensure waste is dealt with in line with circular economy principles?	No												
	Safeguard existing waste management sites?	No												

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA1: The policy supports the achievement of objective IIA1 as the development of the nighttime and evening economy helps to deliver economic growth across Harrow. Night-time economic facilities include restaurants, bars, nightclubs, shops and sporting venues. Additional nighttime economic activities include cleaning, wholesale and distribution, and transport and medical services. Support for existing, and provision of further night-time economic facilities will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy of Harrow. This will particularly be the case in Harrow Metropolitan Centre, which provides the optimal location for late night opening hours. The Council intends to produce a masterplan for the Metropolitan Town Centre, setting out where land uses, including night-time and evening economy, would be best directed to across the town centre. Therefore, due to the provision of economic growth and the support provided to new and existing businesses, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	LE3 Industrial Land
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how the Council will support new development of industrial floorspace within appropriate locations. Proposals will be assessed for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-designated Industrial Land. Non-industrial uses on industrial land are also considered.
Assumptions Made	Development is in accordance with policies relating to matters and other relevant Development Plan Policies.

IIA objective	IIA framework			Assessment								
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA1 as it supports development to intensify, increase or modernise floorspace and premises within Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSIS) in order to increase the provision of floorspace for industrial activities. Proposals will be supported for specified industry types, including General Industry (B2) and similar Sui Generis uses, storage and logistics/distribution (Use Class B8) and low-cost industrial and related space for micro, small and medium-sized enterprises. This should support the creation of new businesses, whilst also supporting the growth and retention of existing businesses. It is suggested that industry types not specified within the policy can be located elsewhere within the Borough due to a limited adverse impact. The policy will seek to deliver the industrial floorspace and premises requirements set out in the London Plan (2021) within existing industrial sites located across the borough. However, in order to meet this requirement, protection must also be afforded to industrial sites that are not designated either as SIL or LSIS, which currently makes up thirty percent of Harrow's industrial stock. Any net loss of industrial floorspace and premises within a SIL or LSIS will not be supported, and proposals that fall within use classes E(g) (ii) & (iii) will be resisted. Therefore, due to the provision of economic growth and the support provided to new and existing businesses, a potential minor positive effect is recorded.			
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	Yes										
	Protect and retain an adequate supply of employment floor space to address business needs?	Yes										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes										
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as the increased provision of industrial land is likely to provide additional part time and full time employment opportunities for local residents. This will contribute to the reduction in unemployment rates across the Borough. In addition, the policy will only support the co-location of residential within a LSIS where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority. This will ensure that industrial sites remain in-use for the purpose they were intended. Therefore, due to the provision of employment opportunities, a potential minor positive effect is recorded.			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No										
	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?	No										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
	Increase the number of additional homes delivered to meet local needs/targets?	Yes										
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes										
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No										
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Improve existing cycling and walking network and provide new routes?	No	Direct	Low	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA6 as it supports development to intensify, increase or modernise floorspace and premises for a range of industry types, such as sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure. Therefore, due to the support provided from this policy for the delivery of sustainable transport, a potential minor positive effect is recorded.			
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes										
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No										
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
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	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)?	Yes	Indirect	Low	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA8 as it supports development to intensify, increase or modernise floorspace and premises for a range of industry types, including utilities infrastructure (such as energy). Therefore, due to the support provided from this policy for the delivery of renewable and low carbon energy capacity, a potential			
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										



	Minimise greenhouse gas emissions?	No								minor positive effect is recorded.			
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	No	Direct	Low	Medium/L	orough	Wide	Permanent/Irreversible	Minor Positive	The policy indirectly supports the achievement of objective IIA14 as proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activity secondary materials, waste management and aggregates. Therefore, due to the support provided from this policy for the waste economy, a potential minor positive effect is recorded.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	LE4 Culture and Creative Industries
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how the Council will support development proposals for cultural and creative industries where certain criteria are met, including being appropriately located and designed.
Assumptions Made	Development is in accordance with policies relating to matters and other relevant Development Plan Policies.

IIA objective	IIA framework			Assessment							Potential for cumulative effects?	Mitigation	Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects				
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	High	Medium/L ong	Regional	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA1 as cultural and creative industry facilities, including heritage assets, theatres, art exhibits and music/nightclub venues, encourage tourism within Harrow. The provision of cultural and creative industry facilities will subsequently assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy of Harrow. Therefore, due to the provision of economic growth, a potential minor positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as support for cultural and creative industries is likely to provide additional part time and full time employment opportunities for local residents. This will contribute to the reduction in unemployment rates across the Borough. Therefore, due to the provision of employment opportunities, a potential minor positive effect is recorded.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
	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?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that support will be given for cultural and creative industries where they take the opportunity to utilise vacant premises in appropriate locations for pop ups or meanwhile uses; this would provide natural surveillance that would not be occurring otherwise, and thus can reduce anti-social behaviour issues arising by reason of such spaces being unoccupied. Support will also be given for cultural and creative industries where for do not harm residential amenity or the free flow and safety of the public highway. Finally, the provision of cultural and creative industry facilities provides opportunities for the community to mix and meet. Therefore, a potential minor positive effect is recorded.				
	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?	Yes											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
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	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No							The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive					
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive					
Maintain and enhance access to cultural heritage assets?	Yes							The policy supports the achievement of objective IIA11 as it highlights that cultural facilities include heritage assets and Areas of Special					

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No									Character, which contribute to the attractiveness of Harrow for both residents and tourists. As a result, the policy will seek to ensure that existing assets are retained and protected, and any opportunity to improve them is realised, including improving public access. Therefore, a potential minor positive effect is recorded.
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No									
	Improve the condition of the historic environment?	No									
	Encourage heritage-led regeneration?	No									
	Help provide solutions to those assets on the Heritage at Risk register?	No									
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive			The policy supports the achievement of objective IIA12 as it highlights that support will be given for cultural and creative industries where they are in a location that is appropriate for their use and are of a size, layout and form that is suitable for the intended use. Therefore, a potential minor positive effect is recorded.
	Promote high quality and contextually successful design?	Yes									
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No									
	Protect sensitive areas and protected views?	No									
	Safeguard landscape and townscape features such as trees?	No									
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral			The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Avoid development of greenfield land?	No									
	Promote the efficient use of minerals?	No									
	Protect soil quality and avoid soil pollution?	No									
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No									
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No									
<b>IIA14 Waste:</b> To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral			The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Encourage new developments to provide adequate space for waste separation?	No									
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No									
	Ensure waste is dealt with in line with circular economy principles?	No									

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	LE 5 Tourism and Visitor Accommodation
Chapter	Chapter 05: Local Economy
Policy/alternative description	The policy outlines how the Council will support development proposals for tourism and visitor accommodation where certain criteria are met, including being appropriately located and designed.
Assumptions Made	None.

IIA framework			Assessment										
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Direct	High	Medium/Long	Regional	Permanent/Irreversible	Significant Positive	The policy supports the achievement of objective IIA1 as the development of tourism infrastructure helps to deliver economic growth across Harrow, and London as a whole. New hotel and leisure development is prioritised within Harrow town centre, in support of the Harrow & Wealdstone Opportunity Area objectives. Further proposals for hotel development and other forms of tourism accommodation should be located in other town centres within the Borough. The provision of tourism infrastructure, and thus employment space, will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy within Harrow's town centres. The provision of tourism infrastructure will also benefit London as a whole, as it will allow visitors to stay in Harrow, but commute into the city centre to visit additional tourist attractions. Therefore, due to the provision of economic growth, a potential significant positive effect is recorded.				
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes											
	Safeguard existing town centres?	Yes											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes											
	Improve existing shopping facilities within town centres and neighbourhood parades?	Yes											
Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes												
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA2 as a strong tourism economy provides part time and full time employment opportunities for local residents. This will contribute to the reduction in unemployment rates across the Borough. Therefore, due to the provision of employment opportunities, a potential minor positive effect is recorded.				
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA3 as it highlights that support will be given for new tourism infrastructure where it provides a choice of accessible accommodation in accordance with Policy E10H (Visitor Infrastructure) of the London Plan (2021). This includes the provision of either 10 per cent of new bedrooms to be wheelchair-accessible in accordance with either Figure 30 or 33 of 'British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice' or 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of 'British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice'. Therefore, due to the provision of accessibility, a potential minor positive effect is recorded.				
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No											
	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?	Yes											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that support will be given for new tourism infrastructure where proposed in areas with good access and links to modes of public transport and active travel routes (e.g. for walking and cycling). Additionally, support will be given for new tourism infrastructure where any vehicle access to and from the highway will be safe. Therefore, a potential minor positive effect is recorded.				
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	Yes											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA5 as it sets in place criteria to protect loss of housing that meets the needs of the borough (specifically family homes). Therefore, a potential minor positive effect is recorded.				
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	Yes											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No												
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA6 as it highlights that support will be given for new tourism infrastructure where proposed in areas with good access and links to modes of public transport and active travel routes. Infrastructure should also ensure adequate drop-off/pick-up and servicing arrangements for private vehicles. Therefore, a potential minor positive effect is recorded.				
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	This policy contributes to the minimisation of light and noise pollution, now and in the future, by highlighting that development associated with tourism and accommodations will not harm local residents through noise, disturbance, loss of light or privacy. Developments should be located in town centres to avoid these impacts as much as possible. Therefore, a potential minor positive effect is recorded.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	Avoid adverse effects on European designated habitats/sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											

Species and functional habitats.	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Indirect	Medium	Medium/Long	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA11 as the provision of new and improved tourist accommodation provides further opportunities to access local attractions and cultural assets. Additional visitors could generate more tourism based income, allowing for further investment into the conservation and enhancement of heritage assets. Therefore, a potential minor positive effect is recorded.				
	Maintain and enhance access to cultural heritage assets?	Yes											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA12 as it highlights that support will be given for new tourism infrastructure where the size and character of the site or building are suitable for the proposed use and the development is compatible with the character and appearance of the area. Therefore, a potential minor positive effect is				
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	Direct	Medium	Long (20+yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of objective IIA14 as it highlights that in order to support the circular economy, purpose-built tourism infrastructure proposals should be provide a statement defining their repurpose value, with minimal intervention. The ability to retrofit will also support changing market conditions within Harrow. Therefore, a potential minor positive effect is recorded.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA1: The policy supports the achievement of objective IIA1 as the development of tourism infrastructure helps to deliver economic growth across Harrow, and London as a whole. New hotel and leisure development is prioritised within Harrow town centre, in support of the Harrow & Wealdstone Opportunity Area objectives. Further proposals for hotel development and other forms of tourism accommodation should be located in other town centres within the Borough. The provision of tourism infrastructure, and thus employment space, will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy within Harrow's town centres. The provision of tourism infrastructure will also benefit London as a whole, as it will allow visitors to stay in Harrow, but commute into the city centre to visit additional tourist attractions. Therefore, due to the provision of economic growth, a potential significant positive effect is recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 06: Social and Community Infrastructure
Chapter	Chapter 06: Community Infrastructure
Policy/alternative description	The policy outlines that development must contribute to the protection, enhancement and additional provision of community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs.
Assumptions Made	None.

IIA objective	IIA framework		Assessment							Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement										
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance															
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	Yes	Indirect	Medium	Long (20+ yrs)	Localised	Permanent/ Irreversible	Minor Positive	This policy supports the achievement of IIA1 as it promotes the development new physical, social, green and blue infrastructure, and resists the loss of existing community facilities unless adequate arrangements are made to replace them. New development should include facilities such as healthcare, leisure and recreation, sports, and community centres as required to meet the needs of current and future development. This should indirectly support the economic regeneration of the area, and ensure town centres maintain a range of uses. New social infrastructure should preferably be developed in the Harrow and Wealdstone Opportunity area or existing town centres to correspond with other growth. Therefore, a potential minor positive effect is recorded.	Yes													
	Support the provision of world class infrastructure and connectivity?	Yes																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	Yes																					
	Safeguard existing town centres?	Yes																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes																					
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+ yrs)	Localised	Permanent/ Irreversible	Minor Positive	The policy promotes the provision of enhanced and/or new social, physical, green and blue infrastructure, which will in turn create a number of full and part time jobs for the local community. As such, the policy indirectly supports the achievement of IIA2 and a potential minor positive effect is recorded.	No													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Medium	Long (20+ yrs)	Localised	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of IIA3 through the promotion of new, and the enhancement of existing social, physical, green and blue infrastructure, as required to meet the needs of a growing population. The provision of new infrastructure should increase accessibility to facilities. Therefore, a potential minor positive effect has been recorded.	Yes													
	Increase the delivery of new or enhanced community and health facilities?	Yes																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	High	Long (20+ yrs)	Localised	Permanent/ Irreversible	Minor Positive	This policy supports the achievement of IIA4 as new and/or enhanced social, physical, green and blue infrastructure will provide individuals with spaces that contribute towards an improved quality of life and therefore health and wellbeing, such as healthcare, education, leisure and recreation, religious buildings and youth facilities. The policy states that development must serve existing needs and meet future requirements, including that of population growth. As such, a potential minor positive effect has been recorded.	No		
		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?											Yes										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		Yes																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		Yes																					
Increase provision of private amenity space?		Yes																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																					
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Direct	Low	Long (20+ yrs)	Borough Wide	Permanent/ Irreversible	Minor Positive	The policy works towards the achievement of IIA9 through the provision of new green and blue infrastructure, as required to adequately address the Boroughs existing and future needs. As such, a minor positive effect has been recorded.	No													
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes																					
<b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and	Avoid adverse effects on European designated habitats sites?	No	Indirect	Medium	Long (20+ yrs)	Borough Wide	Permanent/ Reversible	Minor Positive	The policy works towards the achievement of IIA10 through the provision of new green and blue infrastructure, as required to adequately address the Boroughs existing and future needs. This should have a minor positive effect on biodiversity through the enhancement of designated green infrastructure, therefore a potential	Yes													
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
		No																					

To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Achieve biodiversity net gain (BNG) in new developments?	No							minor positive effect has been recorded.			
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
	Protect sites of geological importance?	No										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No										
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral				The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	C1: Safeguarding and Securing Social Infrastructure
Chapter	Chapter 06: Community Infrastructure
Policy/alternative description	The policy outlines that proposals will be required to make contributions towards the provision of enhanced or new social infrastructure, in locations where there are existing capacity issues or a need is identified, to support new development. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative uses.
Assumptions Made	None.

IIA framework		Assessment																					
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Medium	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA1 as it promotes the provision of enhanced and/or new social infrastructure, which will include facilities such as healthcare, leisure and recreation, sports, and community facilities. This should indirectly support the economic regeneration of the area, and ensure town centres maintain a range of uses. New social infrastructure should preferably be developed in the Harrow and Wealdstone Opportunity area or existing town centres. Therefore, a potential minor positive effect is recorded.	Yes													
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	Yes																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	Yes																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of enhanced and/or new social infrastructure, which will in turn create a number of full and part time jobs for the local community. As such, a potential minor positive effect is recorded.	No													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Medium	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA3 through the promotion of new, and the enhancement of existing social infrastructure, including that of health, recreation, and education services. The policy additionally appears to ensure that development will occur with equitable accessibility in mind through the 'all-abilities accessible buildings' and 'co-location social infrastructure'. The policy aims to avoid discriminatory impact on protected characteristics, in this case religious identity, through the specified consultation of burial grounds requirements. Therefore, a potential minor positive effect has been recorded.	Yes													
	Increase the delivery of new or enhanced community and health facilities?	Yes																					
	Help ensure all children have access to a local school within reasonable walking distance?	Yes																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	Yes																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	Yes																					
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes																					
	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?	Yes																					
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	Yes	Direct	High	Long (20+ yrs)	Localised	Permanent/Irreversible	Significant Positive	This policy supports the achievement of IIA4 as it highlights that proposals relating to new and/or enhanced social and community infrastructure facilities must demonstrate that they are located in areas that are easily accessible by public transport and active travel, they do not adversely impact residential amenity or highway safety, they provide flexible, adaptable and all abilities accessible buildings preferably co-located with other social infrastructure uses, and they must maximise wider community benefit through the utilisation of community use agreements. Social infrastructure covers facilities that contribute towards an individual's quality of life and therefore health and wellbeing, such as healthcare, education, leisure and recreation, religious buildings and youth facilities. The policy specified that the council are continuing to seek and identify community needs in regards to burial spaces due to differing religious needs, demonstrating that representative groups and undergoing engagement. As such, a potential significant positive effect has been recorded.	No													
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes																					
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes																					
	Increase provision of private amenity space?	No																					
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No																					
	Ensure all representative groups will be consulted and engaged with?	Yes																					
	Increase the number of additional homes delivered to meet local needs/targets?	No																					
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																					
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes																					
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes																					
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	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)?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
Support the shift towards usage of electric and ultralow emissions vehicles?		No																					
Promote a low carbon local economy?		No																					
Ensure new developments are energy efficient?		Yes																					
Minimise greenhouse gas emissions?		No																					
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	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
	Achieve biodiversity net gain (BNG) in new developments?	No																					
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No																					
	Maintain and enhance access to cultural heritage assets?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No																					
	Improve the condition of the historic environment?	No																					
	Encourage heritage led regeneration?	No																					
	Help provide solutions to those assets on the Heritage at Risk register?	No																					
	IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Support the delivery of new or enhanced transport and communications infrastructure?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
		Encourage the protection of allotments and encourage the delivery of new spaces to grow food?											No										
		Ensure all representative groups will be consulted and engaged with?											Yes										
		Increase the number of additional homes delivered to meet local needs/targets?											No										
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?											No										
Provide affordable homes of the tenure and size to meet the identified needs?		No																					
Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?		No																					
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?		No																					
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?		No																					
Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?		Yes																					
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Support the delivery of new or enhanced transport and communications infrastructure?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No																					
	Ensure all representative groups will be consulted and engaged with?	Yes																					
	Increase the number of additional homes delivered to meet local needs/targets?	No																					
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																					
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes																					



<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. The policy does not demonstrate a contribution towards safeguarding the landscape and townscape in regard to new social infrastructure, nor does it specify that new social infrastructure should not be developed on areas of protected or greenbelt land, however, this is covered in Policy GI1 : Green Belt and Metropolitan Land (Chapter 7).	Yes		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes										
	Protect sensitive areas and protected views?	Yes										
<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>	Safeguard landscape and townscape features such as trees?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No										
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	Indirect	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy indirectly supports the achievement of IIA14 through the promotion of retaining and protecting existing infrastructure from loss to alternative uses.	No		
	Encourage new developments to provide adequate space for waste separation?	No										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

**Significant Negative and Uncertain Effects**

**Significant Positive Effects**

IIA4: This policy supports the achievement of IIA4 as it highlights that proposals relating to new and/or enhanced social and community infrastructure facilities must demonstrate that they are located in areas that are easily accessible by public transport and active travel, they do not adversely impact residential amenity or highway safety, they provide flexible, adaptable and all abilities accessible buildings preferably co-located with other social infrastructure uses, and they must maximise wider community benefit through the utilisation of community use agreements. Social infrastructure covers facilities that contribute towards an individual's quality of life and therefore health and wellbeing, such as healthcare, education, leisure and recreation, religious buildings and youth facilities. The policy specified that the council are continuing to seek and identify community needs in regards to burial spaces due to differing religious needs, demonstrating that representative groups and undergoing engagement. As such, a potential significant positive effect has been recorded.

**Potential Cumulative Effects Identified**

**Mitigation**

**Enhancements**

Policy/Alternative name	C12 Play and Informal Recreation
Chapter	Chapter 06: Community Infrastructure
Policy/alternative description	The policy outlines that development proposals that are likely to be occupied or used by children and young people must increase opportunities for play and informal recreation.
Assumptions Made	None.

IIA objective	IIA framework		Assessment							Potential for cumulative effects?	Mitigation	Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects			
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Create new jobs in high value sectors, including in the green sector?	No										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	High	Long (20+yrs)	Localised	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of IIA3 through the promotion of accessible play and formal leisure facilities for children and young people. This is as development must be well designed and delivered in a way that is accessible to all age groups and abilities within the development area. It has been specified that play and other outdoor communal amenity space should be integrated at the street or ground floor level, to ensure accessibility to all. There will also be provided rest and amenities areas for children and parents (e.g., benches, water, and shade) ensuring that all age groups are accounted for in the design. As such, a potential minor positive result has been recorded.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes										
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	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?	Yes	Direct	High	Long (20+yrs)	Localised	Permanent/ Irreversible	Significant Positive	The policy supports the achievement of IIA4 through the promotion of health and wellbeing that inherently comes with play and informal leisure spaces. The policy acknowledges that safe and stimulating play spaces have a positive impact on physical and mental wellbeing of both children and parents. Play facilities support the fight against childhood obesity and also provide opportunities for social interaction and development in young people, which will promote a healthy and high quality lifestyles. New play and informal spaces will also increase the number of public spaces available for community use, and ensure everyone has access to open, and potentially green, space. As such, a potential significant positive effect is predicted.	Yes		
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes										
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	No										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	No										
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
Ensure all representative groups will be consulted and engaged with?	No											
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No										
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultra low emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Low	Long (20+yrs)	Localised	Permanent/ Irreversible	Minor Positive	The policy supports the achievement of IIA9 as it states that all new play spaces must be designed to incorporate landscaping and permeable surfaces, which contributes to the provision of drainage and should in turn minimise surface flood risk. As such, a minor positive effect has been recorded.	Yes		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
<b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Minimise greenhouse gas emissions?	No	Direct	Medium	Long (20+yrs)	Localised	Permanent/ Reversible	Minor Positive	The policy supports the achievement of IIA9 as it has specified that any new play or informal leisure space should maximise opportunities to integrate nature and 'green features' including tree planting and landscaping. This should have a positive impact on biodiversity, potentially leading to biodiversity net gain, and will increase access to green space. Therefore a potential minor positive effect has been recorded.	No		
	Avoid adverse effects on European designated habitats sites?	No										
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	Yes										
	Provide new or improved access to greenspaces?	Yes										
Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
Protect sites of geological importance?	No											

<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Help provide solutions to those assets on the Heritage at Risk register?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No										
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
<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>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?..	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?..	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage new developments to provide adequate space for waste separation?	No										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA4: The policy supports the achievement of IIA4 through the promotion of health and wellbeing that inherently comes with play and informal leisure spaces. The policy acknowledges that safe and stimulating play spaces have a positive impact on physical and mental wellbeing of both children and parents. Play facilities support the fight against childhood obesity and also provide opportunities for social interaction and development in young people, which will promote a healthy and high quality lifestyles. New play and informal spaces will also increase the number of public spaces available for community use, and ensure everyone has access to open, and potentially green, space. As such, a potential significant positive effect is predicted.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	CI3 Sport and Recreation
Chapter	Chapter 06: Community Infrastructure
Policy/alternative description	The policy outlines that proposals for uses that would support existing or proposed outdoor sport and recreational facilities, and increase the capacity and quality, will be supported where they meet certain criteria.
Assumptions Made	None.

IIA objective	IIA framework				Assessment					Potential for cumulative effects?	Mitigation	Enhancement
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects			
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA1 as it promotes the provision of formal and informal sports and recreational centres, which will indirectly support the economic regeneration of the area and ensure town centres maintain a range of uses. Therefore, a potential minor positive effect is recorded.	Yes		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
Safeguard existing town centres?	No											
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of new and enhanced sports and recreation facilities, which will in turn create a number of full and part time jobs for the local community. As such, a potential minor positive effect has been recorded.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	High	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA3 through the promotion of accessible formal and informal sports and recreational facilities. The Harrow Indoor and Outdoor Sports Facilities Strategy (2023 – 2037) has assessed existing and future needs for sporting infrastructure provision across the borough, and recognises the pressures arising from a growing, ageing and changing population, meaning that sporting infrastructure needs to be protected and enhanced to meet the needs of the changing population. Sports and leisure facilities must allow for equitable access for all residents regardless of their characteristics. As a result, a minor positive effect has been recorded.	No		
	Increase the delivery of new or enhanced community and health facilities?	Yes										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	Yes										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes										
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?	Yes											
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	High	Long (20+yrs)	Localised	Permanent/Irreversible	Significant Positive	The policy supports the achievement of IIA4 through the promotion of health and wellbeing that arises through sport and recreation. The policy acknowledges that the provision of formal and informal sport and recreation facilities encourages physical activity and delivers a range of social, health and wellbeing benefits to communities, which promotes a healthy and high quality lifestyles. Increasing the capacity and quality of outdoor sport and recreational facilities would also increase the number of public spaces available for community use, and ensure everyone has access to open and/or private recreational space. As such, a potential significant positive effect has been recorded.	No		
	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?	Yes										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	Yes										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
Ensure all representative groups will be consulted and engaged with?	Yes											
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Indirect	Low	Long (20+yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA6 through the requirement that new and upgraded sports and leisure facilities ensure that sustainable transport options (e.g., public transport, walking and cycling routes) are prioritised for users to minimise the reliance on cars for access. Therefore, a potential minor positive effect is predicted.	Yes		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Medium	Long (20+yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA6 as it avoids the exacerbation of light pollution by keeping external lighting to the minimum required for safety and security, by ensuring that all proposals for floodlighting are supported only where they enhance facilities and do not detrimentally impact the character of open land, the amenity of neighbouring occupiers, or biodiversity.	No		The policy does not explicitly mention how new recreational facilities such as sports centres will impact noise pollution. It is recommended that this is addressed in the policy in order to improve it's performance.
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes										
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultralow emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	Yes										
	Minimise greenhouse gas emissions?	No										
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
<b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and	Avoid adverse effects on European designated habitats sites?	No	Direct	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA10 as it has been specified that proposals that would increase the capacity and quality of outdoor sport and recreational facilities would not have a detrimental impact on any biodiversity asset within or surrounding the site. This will	No		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes										
	Conserve, enhance and repair natural and semi natural habitats?	Yes										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										

To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Achieve biodiversity net gain (BNG) in new developments?	No								conserve any natural/semi-natural habitats within the designated development location and protect sites of geological importance. As such, a potential minor positive effect has been determined.			
	Provide new or improved access to greenspaces?	Yes											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	Yes											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA11 as it has been specified that proposals that would increase the capacity and quality of outdoor sport and recreational facilities would not have a detrimental impact on any heritage significance within or surrounding the site. This should protect any heritage assets, cultural and archaeological assets and features, and their settings. As such, a potential minor positive effect has been recorded.	No			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	Direct	High	Long (20+yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA12 as proposals that would increase the capacity and quality of outdoor sport and recreational facilities will be supported only if there is no conflict with the Green Belt, Metropolitan Open Land or Open Space policies. As such, sensitive and protected areas will be avoided in development, and therefore a potential minor positive effect has been determined.	No			
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes											
	Protect sensitive areas and protected views?	Yes											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	Yes											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Direct	High	Long (20+yrs)	borough Wide	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA13 as it specifies that any new development must not conflict with the Green Belt. As such, a potential minor positive effect has been identified.	Yes			
	Avoid development of greenfield land?	Yes											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No												
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage new developments to provide adequate space for waste separation?	No											
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA4: The policy supports the achievement of IIA4 through the promotion of health and wellbeing that arises through sport and recreation. The policy acknowledges that the provision of formal and informal sport and recreation facilities encourages physical activity and delivers a range of social, health and wellbeing benefits to communities, which promotes a healthy and high quality lifestyles. Increasing the capacity and quality of outdoor sport and recreational facilities would also increase the number of public spaces available for community use, and ensure everyone has access to open and/or private recreational space. As such, a potential significant positive effect has been recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA7: The policy does not explicitly mention how new recreational facilities such as sports centres will impact noise pollution. It is recommended that this is addressed in the policy in order to improve its performance.

Policy/Alternative name	C14 Digital and Communications Infrastructure
Chapter	Chapter 06: Community Infrastructure
Policy/alternative description	The policy outlines that proposals for the installation of telecommunications equipment will be supported where they meet specific criteria.
Assumptions Made	None.

IIA framework		Assessment																					
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Irreversible	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Direct	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA1 through the proposed increase in digital connectivity, which will have an impact on the economic growth of the Borough as it plays an important role in maintaining a competitive local economy. It allows for online businesses to thrive and supports flexible working for residents. Therefore a minor positive effect has been recorded.	No													
	Support the provision of world class infrastructure and connectivity?	Yes																					
	Support flexible working practices?	Yes																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA2 through the proposed increase in digital connectivity. This should have an indirect impact on employment within the Borough as there will be greater opportunity for residents to run their businesses or work from home. Since the pandemic, there has been a significant cultural shift and an increased rate in people working from home, increasing reliance on this technology. As a result, a minor positive effect has been recorded.	No													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	Yes	Direct	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA3 through the proposed increase in telecommunications equipment, that will enable residents and businesses to access high-speed, reliable digital connectivity. Although this is not a tangible facility, it is one that is a necessity for people who work from home, businesses, and individuals for several reasons such as booking healthcare appointments, education, and other services. Improved digital connectivity will increase accessibility to those who may not be able to do these in person. Therefore, a potential minor positive effect has been recorded.	No													
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No																					
	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?	Yes																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No												
		Increase the delivery of the right size of housing to address local needs, particularly family-sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
	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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?											No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?		No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA11 through the proposal that telecommunications equipment will only be supported where there would be no unacceptable impact upon areas on biodiversity and landscape value. As a result, a minor positive effect has been recorded.	No													
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
	Achieve biodiversity net gain (BNG) in new developments?	No																					
	Provide new or improved access to greenspaces?	No																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No																					
	Protect sites of geological importance?	No																					

<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA11 through the proposal that telecommunications equipment will only be supported where there would be no unacceptable impact upon areas of heritage. As such, a potential minor positive effect has been recorded.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
Help provide solutions to those assets on the Heritage at Risk register?	No											
<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA12 as the installation of telecommunication equipment will only be supported if the siting and design would minimise its impact upon the amenity of neighbouring occupiers, the host building, and the appearance and character of the area. As such, the policy protects the local landscapes views and character, and therefore a potential minor positive effect has been recorded.	No		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	Yes										
	Safeguard landscape and townscape features such as trees?	No										
<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>	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
<b>IIA14 Waste:</b> <b>To minimise waste.</b>	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 07: Green Infrastructure
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	The policy outlines how green infrastructure development proposals are considered. Green Belt and Metropolitan Open Land will be protected from development. Biodiversity and drainage should be enhanced in new development.
Assumptions Made	None.

IIA objective	IIA framework		Assessment														
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment/intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Medium	Medium/Long	borough Wide	Permanent/Irreversible					Minor Positive	The policy supports the restoration, enhancement and extension of green infrastructure where appropriate, which should provide more residents with access to green, open space. The policy also states that there should be no net loss of green space in the Borough, placing protection on access to nature in existing spaces. Additionally, green infrastructure will support local food growing measures, such as allotments. These policy factors should help to support the health and wellbeing of Harrow residents. Therefore, a potential minor positive effect is recorded.	Yes		
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		Yes															
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		Yes															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		Yes															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	No															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Low	Medium (10yrs)	borough Wide	Temporary/Reversible	Minor Positive	Although not directly referenced by the policy, it can be suggested that a focus on the creation of green spaces and biodiversity enhancement through the policy will contribute to the minimisation of air and light pollution, by acting as a natural carbon sink. Therefore, there is potential for a minor positive effect to occur.	No							
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	No															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports objective IIA9 as it states that developments should identify, protect, restore, enhance and extend green infrastructure within the Borough. The policy also highlights that new green infrastructure should consider drainage, with a focus being placed on natural SUDs provision. This should aid in the adaptation to the effects of climate change, particularly flood risk. Therefore a	No							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	High	Medium/Long	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports objective IIA10 as it states that developments should consider and maximise opportunities for biodiversity, particularly where this can create biodiversity net gain in old and new developments. The policy also states that there should be no net loss of green space in the Borough, placing protection on the biodiversity that exists in these spaces. Therefore, a potential minor positive effect is recorded.	Yes							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No															
	Conserve, enhance and repair natural and semi-natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No															
	Achieve biodiversity net gain (BNG) in new developments?	Yes															
	Provide new or improved access to greenspaces?	Yes															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes															
Protect sites of geological importance?	No																
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	This policy states that green spaces should support the historic environment through their ability to enhance heritage assets and link to local history. As a result, a minor positive effect is recorded.	No							
	Maintain and enhance access to cultural heritage assets?	Yes															
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No															
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No															
	Improve the condition of the historic environment?	No															
	Encourage heritage led regeneration?	No															
	Help provide solutions to those assets on the Heritage at Risk register?	No															
IIA12 Green Infrastructure: To respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	Indirect	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy provides indirect support for objective IIA12 as it can be assumed that the protection of Green Belt and MOL from	No							
	Promote high quality and contextually successful design?	No															



IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes											
	Protect sensitive areas and protected views?	Yes											
	Safeguard landscape and townscape features such as trees?	Yes											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Indirect	Medium	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy provides indirect support for IIA13 through protecting and maximising biodiversity, soil and water quality is also likely to benefit. The policy also seeks to ensure that a range of ecosystem services can be provided by green infrastructure. This could include water purification, infiltration and flood storage etc. Therefore, a potential minor positive effect is recorded.	No			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	Yes											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	Yes											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage new developments to provide adequate space for waste separation?	No											
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	G11 Green Belt and Metropolitan Open Land
Chapter	Chapter 07: Green Infrastructure
Policy/Alternative description	The policy outlines how development proposals on Green Belt and Metropolitan Open Land are considered. Proposals will be supported that do not have a significant effect on character, openness, public access and biodiversity.
Assumptions Made	None.

IIA objective	IIA framework						Assessment					
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancements
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy may restrict the development of employment land, as it may be seen as an inappropriate development within Green Belt and Metropolitan Open Land. However, as Green Belt land is likely to be in less accessible locations throughout the Borough, it may already be unsuitable for certain employment uses, and therefore have no impact on employment land allocation. The Local Plan should allocate sufficient space for housing and employment land elsewhere within the Borough and be able to avoid development within Green Belt and Metropolitan Open Land. A neutral effect is identified overall.			
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	No										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	Yes										
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No										
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse or discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No										
	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?	No										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	Direct	Medium	Medium/L ong	borough Wide	Permanent/irreversible	Minor Positive	The policy provides support for objective IIA4 as proposals for development in the Green Belt/MOL will be supported, as long as public accessibility is enhanced (as part of the Green Grid) or the land is used for food growing/community gardens. Therefore, a potential minor positive effect is recorded.			
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	Yes										
	Increase provision of private amenity space?	Yes										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	Yes										
	Ensure all vulnerable groups will be consulted and engaged with?	No										
	Increase the number of additional homes delivered to meet local needs/targets?	Yes										
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy may restrict the development of housing, as it may be seen as inappropriate development within Green Belt and Metropolitan Open Land. However, as Green Belt land is likely to be in less accessible locations throughout the Borough, it may already be unsuitable for housing, and therefore have no impact on housing allocation. The Local Plan should allocate sufficient space for housing and employment land elsewhere within the Borough and be able to avoid development within Green Belt and Metropolitan Open Land. A neutral effect is identified overall.			
	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No										
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No										
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicle movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No										
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	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)?	No	N/A	N/A	N/A	N/A	N/A				
Support the shift towards usage of electric and ultra-low emissions vehicles?		No										
Promote a low carbon local economy?		No										
Ensure new developments are energy efficient?		No										
Minimise greenhouse gas emissions?		No										
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No										
IIA10 Biodiversity: To safeguard and enhance biodiversity and good diversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy provides support for objective IIA10 as proposals for development in the Green Belt/MOL will be supported, as long as biodiversity and natural capital improvements are made to the site. Therefore, a potential minor positive effect is recorded.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No										
	Conserve, enhance and repair natural and semi natural habitats?	Yes										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	Yes										
	Provide new or improved access to greenspaces?	No										
Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy provides support for objective IIA11 as proposals for development in the Green Belt/MOL will be supported, as long as heritage assets are protected and enhanced. This should indirectly support access to heritage assets. Proposals will also be supported where developments can provide proof of support for the character of the area. Therefore, a potential minor positive effect is recorded.			
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes										
	Maintain and enhance access to cultural heritage assets?	Yes										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	Yes										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Encourage heritage led regeneration?	No	Direct	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy provides support for objective IIA12 as by maintaining and protecting the Green Belt and Metropolitan Open Space from inappropriate development, the Borough's landscape and townscape is conserved and enhanced. This includes protection of Green Belt and MOL from development that would have a negative visual impact. Additionally, when considering redevelopment/infilling of previously developed sites in the Green Belt/MOL, regard must be given to the height of the buildings, visual amenity and character of the buildings. Although it is not explicitly stated that landscape/townscape features such as trees will be safeguarded, it can be assumed that natural features such as these will be protected due to the focus on maximising biodiversity. However, as this policy does not completely safeguard development in the Green Belt or MOL, a potential minor positive effect is recorded.			Enhancement: The policy should safeguard Green Belt and Metropolitan Open Land from all development, not just inappropriate development.
	Help provide solutions to those assets on the Heritage at Risk register?	No										
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes										
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes										
	Protect sensitive areas and protected views?	Yes										
IIA13 Soils and Water: To minimise water and soil pollution and ensure	Safeguard landscape and townscape features such as trees?	Yes	Indirect	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy provides indirect support for objective IIA13 as by maintaining and protecting the Green Belt and Metropolitan Open Space from inappropriate development, greenfield land is being safeguarded. Therefore, a potential minor positive effect is recorded.			
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No										
	Avoid development of greenfield land?	Yes										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										

<p>IA14 Water: To minimise water and pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</p>	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No									
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No									
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No									
	IA14 Waste: To minimise waste.										
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No									
	Ensure waste is dealt with in line with circular economy principles?	No									
	Safeguard existing waste management sites?	No									

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

IA7: Enhancement: cross reference with Policy GR7 External Lighting to try and achieve darker night skies in these more open parts of the borough.  
 IA12: Enhancement: The policy should safeguard Green Belt and Metropolitan Open Land from all development, not just inappropriate development.

Enhancements

#REF!

Policy/Alternative name	GI2 Open Space
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	The policy outlines how development proposals on Open Space are considered. Proposals will be supported that do not have a significant effect on character, openness, public access and biodiversity.
Assumptions Made	None.

IIA objective	IIA framework			Assessment																			
	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that space could be used for the development of community infrastructure in exceptional circumstances. Therefore, a potential minor positive effect is recorded.														
	Increase the delivery of new or enhanced community and health facilities?	Yes																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA4 as it highlights that developments must provide, protect and enhance publicly accessible open space, unless demonstrated that this is not possible. Areas in deficiency of open space/informal recreation facilities will be particularly supported. Developments must not lead to loss of access to natural green space, unless the site is required for critical social infrastructure. Where on-site provision of open space cannot be provided, offsite contributions will be required. Therefore, a potential minor positive effect is recorded.			
		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?											Yes										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		Yes																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		Yes																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	No																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	No																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Indirect	Medium	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	By developing new areas of open space, the policy indirectly supports objective IIA9 by contributing to the creation of a network of green and blue infrastructure. Therefore, a potential minor positive effect is recorded.														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy highlights that developments must enhance biodiversity and natural capital. Developments must also improve access to biodiversity, whilst ensuring that there is no loss of access to natural greenspace. This policy will also work alongside Policy GI3 Biodiversity, which requires all developments to implement 15% biodiversity net gain. Therefore, a potential minor positive effect is recorded.														
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No																					
	Conserve, enhance and repair natural and semi-natural habitats?	No																					
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No																					
	Achieve biodiversity net gain (BNG) in new developments?	Yes																					
	Provide new or improved access to greenspaces?	Yes																					
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes																					
Protect sites of geological importance?	No																						
IIA11 Historic Environment: To conserve and enhance the historic environment,	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Maintain and enhance access to cultural heritage assets?	No																					
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No																					
		No																					

heritage assets (including known and unknown archaeological sites) and their settings	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No												
	Improve the condition of the historic environment?	No												
	Encourage heritage led regeneration?	No												
	Help provide solutions to those assets on the Heritage at Risk register?	No												
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Promote high quality and contextually successful design?	No												
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No												
	Protect sensitive areas and protected views?	No												
	Safeguard landscape and townscape features such as trees?	No												
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Avoid development of greenfield land?	No												
	Promote the efficient use of minerals?	No												
	Protect soil quality and avoid soil pollution?	No												
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No												
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No												
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No												
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No												
	Ensure waste is dealt with in line with circular economy principles?	No												
	Safeguard existing waste management sites?	No												

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	G13 Biodiversity
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	The policy outlines how biodiversity and natural capital must be protected and enhanced in development proposals. Proposals will be supported that do not have a significant negative effect or cause loss of internationally, nationally or locally designated habitats and species. All major and minor development proposals must be supported by a minimum 15% Biodiversity Net-Gain.
Assumptions Made	None.

IIA objective	IIA framework		Assessment														
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancements=					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Reversible					Minor Positive	The policy supports the achievement of this IIA objective as it states that developments should improve access to nature, where possible, and any developments that would increase deficiencies surrounding access to nature would be resisted. This would benefit the health and wellbeing of residents. Therefore, there is potential for a minor positive effect to be recorded.			
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		No															
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		Yes															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.							
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	No															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the shift towards usage of electric and ultra low emissions vehicles?	No															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	No															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Indirect	Medium	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy states that development proposals must not result in loss or negative impacts on green or blue corridors. The policy indirectly supports this IIA objective as higher levels of protection may encourage the development of new green/blue corridors across the Borough. Therefore, there is potential for a minor positive effect to								
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes															
IIA10 Biodiversity:	Avoid adverse effects on European designated habitats sites?	Yes	Direct	High	Medium/L ong	Regional	Permanent/Irreversible	Significant Positive	The policy supports the achievement of this IIA objective as it highlights that new developments must protect biodiversity and natural capital; this should be evidenced in the proposal stage and the Ecological Mitigation Hierarchy should be used. Biodiversity loss and negative impacts to irreplaceable habitats/features, nationally or internationally designated sites, core Local Nature Recovery Strategy areas in London or Hertfordshire and other important sites must not be generated. All development proposals must submit a biodiversity								
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes															
	Conserve, enhance and repair natural and semi natural habitats?	Yes															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes															
	Achieve biodiversity net gain (BNG) in new developments?	Yes															
	Provide new or improved access to greenspaces?	Yes															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes															



Policy/Alternative name	G14 Urban Greening, Landscaping and Trees
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	The policy outlines how urban greening, landscaping and trees are considered in development proposals. Development proposals must maximise opportunities for local greening (e.g.: through high quality and species diverse landscaping, trees, wildlife habitat, green roofs, green walls and Sustainable Drainage Systems). Major development proposals must increase the overall value of green cover on site to achieve the London Plan recommended Urban Greening Factor (UGF).
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	Assessment													
			Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement				
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the provision of world class infrastructure and connectivity?	No														
	Support flexible working practices?	No														
	Protect and retain an adequate supply of employment floor space to address business needs?	No														
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No														
	Safeguard existing town centres?	No														
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No														
	Improve existing shopping facilities within town centres and neighbourhood parades?	No														
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No														
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No														
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No														
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Increase the delivery of new or enhanced community and health facilities?	No														
	Help ensure all children have access to a local school within reasonable walking distance?	No														
	Increase education facility provision for children with learning disabilities?	No														
	Ensure local facilities have capacity to accommodate proposed development?	No														
	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?	No														
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No														
	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?	No														
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A	N/A				Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
		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?	No													
Increase and improve opportunities for active travel including walking and cycling?		No														
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No														
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No														
Increase provision of private amenity space?		No														
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No														
Ensure all representative groups will be consulted and engaged with?		No														
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No													
	Provide affordable homes of the tenure and size to meet the identified needs?	No														
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No														
	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?	No														
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No														
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No														
	Improve existing cycling and walking network and provide new routes?	No														
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No														
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No														
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Low	Medium (10yrs)	borough Wide	Temporary/Reversible	Minor Positive	Although not directly referenced by the policy, it can be suggested that a focus on the planting of new, and protection of old, trees will contribute to the minimisation of air pollution, by acting as a natural carbon sink. Therefore, there is potential for a minor positive effect to be recorded.							
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No														
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the shift towards usage of electric and ultra low emissions vehicles?	No														
	Promote a low carbon local economy?	No														
	Ensure new developments are energy efficient?	No														
	Minimise greenhouse gas emissions?	No														
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Reversible	Minor Positive	The policy supports objective IIA9 as it states that new developments must utilise a design-led approach to maximise opportunities for local greening such as SUDs. The policy also highlights that proposals for the provision of non-permeable surfaces (e.g.: hard surfacing of forecourts and front gardens) should be avoided. Therefore, there is							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes														
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes														
IIA10 Biodiversity: To enhance and protect biodiversity and create new wildlife habitats	Avoid adverse effects on European designated habitats/sites?	No	Direct	Medium	Medium/Long	borough Wide	Permanent/Reversible	Significant Positive	The policy supports objective IIA10 as it states that new developments must maximise opportunities for local greening and habitat creation. Examples include incorporating species diverse landscaping, trees, wildlife habitats, green roofs and green walls. The policy highlights that developments that support native species should be prioritised, as well as those that retain and protect existing trees, woodlands and hedgerows. Trees identified for protection must be protected during construction, with appropriate Root							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No														
	Conserve, enhance and repair natural and semi-natural habitats?	No														
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes														
	Achieve biodiversity net gain (BNG) in new developments?	Yes														
	Provide new or improved access to greenspaces?	No														
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes														



IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Protect sites of geological importance?	No									Protection Areas identified and safeguarded. For any trees lost during development, two must be planted in its place. Provision for hard and soft landscaping in new developments must support biodiversity and provide sufficient space for new or existing trees. The planting of street trees and shrubs will be supported, and grass verges will be restored/maintained where possible. Major development proposals must also increase the overall value of green cover on site to achieve the London Plan recommended Urban Greening Factor (UGF), unless it is demonstrated that this is not feasible. Therefore, there is potential for a minor positive effect to be recorded.
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy supports objective IIA11 as it places a focus on the protection of heritage assets, such as ancient/veteran trees, trees subject to a TPO, ancient woodland and hedgerows. Any development that would lead to the loss or harm of these heritage assets will not be approved. Therefore, there is potential for a minor positive effect to be recorded.		
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Maintain and enhance access to cultural heritage assets?	No									
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No	Direct	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy supports objective IIA12 as it states that developments that make provision for hard and soft landscaping must ensure that it is appropriate to the character of the area, the visual setting of the building and must prioritise the use of native species. Therefore, there is potential for a minor positive effect to be recorded.		
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No									
	Improve the condition of the historic environment?	No									
	Encourage heritage-led regeneration?	No									
	Help provide solutions to those assets on the Heritage at Risk register?	No									
Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Indirect	Low	Medium/L ong	borough Wide	Temporary/Reversible	Minor Positive	The policy provides indirect support for IIA13 as by protecting biodiversity, soil and water quality is also likely to benefit from protection. Therefore, a potential minor positive effect is recorded.			
Promote high quality and contextually successful design?	No										
Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
Protect sensitive areas and protected views?	No										
Safeguard landscape and townscape features such as trees?	Yes										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Avoid development of greenfield land?	No									
	Promote the efficient use of minerals?										
	Protect soil quality and avoid soil pollution?										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No									
IIA14 Waste: To minimise waste.	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No									
	Encourage new developments to provide adequate space for waste separation?	No									
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No									
Ensure waste is dealt with in line with circular economy principles?	No										
Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA10: The policy supports objective IIA10 as it states that new developments must maximise opportunities for local greening and habitat creation. Examples include incorporating: species diverse landscaping, trees, wildlife habitats, green roofs and green walls. The policy highlights that developments that support native species should be prioritised, as well as those that retain and protect existing trees, woodlands and hedgerows. Trees identified for protection must be protected during construction, with appropriate Root Protection Areas identified and safeguarded. For any trees lost during development, two must be planted in its place. Provision for hard and soft landscaping in new developments must support biodiversity and provide sufficient space for new or existing trees. The planting of street trees and shrubs will be supported, and grass verges will be restored/maintained where possible. Major development proposals must also increase the overall value of green cover on site to achieve the London Plan recommended Urban Greening Factor (UGF), unless it is demonstrated that this is not feasible. Therefore, there is potential for a minor positive effect to be recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	GI5 Food Growing
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	This policy outlines how the Council will support proposals to enhance, and increase provision of allotments, city farms and community gardens, and will resist proposals that will lead to their loss.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment						
			Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement				
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the provision of world class infrastructure and connectivity?	No														
	Support flexible working practices?	No														
	Protect and retain an adequate supply of employment floor space to address business needs?	No														
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No														
	Safeguard existing town centres?	No														
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No														
	Improve existing shopping facilities within town centres and neighbourhood parades?	No														
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No														
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No														
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No														
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Increase the delivery of new or enhanced community and health facilities?	No														
	Help ensure all children have access to a local school within reasonable walking distance?	No														
	Increase education facility provision for children with learning disabilities?	No														
	Ensure local facilities have capacity to accommodate proposed development?	No														
	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?	No														
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No														
	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?	No														
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive				The policy supports objective IIA4 as it supports local food growing measures, such as allotments, city farms and community gardens. Proposals that would result in the loss of these spaces will be resisted. Housing and community developments are encouraged through the policy to include provision for community gardening and food growing, and proposals must demonstrate that options for provision have been explored. These policy factors should help to support the health and wellbeing of Harrow residents through social interaction and education benefits. Therefore, a potential minor positive effect is recorded.			
		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?	No													
Increase and improve opportunities for active travel including walking and cycling?		No														
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No														
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No														
Increase provision of private amenity space?		Yes														
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		Yes														
Ensure all representative groups will be consulted and engaged with?		No														
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No													
	Provide affordable homes of the tenure and size to meet the identified needs?	No														
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No														
	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?	No														
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No														
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No														
	Improve existing cycling and walking network and provide new routes?	No														
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No														
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No														
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No														
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the shift towards usage of electric and ultra low emissions vehicles?	No														
	Promote a low carbon local economy?	No														
	Ensure new developments are energy efficient?	No														
	Minimise greenhouse gas emissions?	No														
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Indirect	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports objective IIA9 as new proposals for allotments and gardens will also have to take flood risk into account when decided on locations for development. This may subsequently lead to the implementation of flood risk mitigation, in order to protect food growth. Therefore, there is potential for an indirect minor positive effect to be recorded.							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No														
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No														
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of this IIA objective as by protecting existing, as well as enhancing opportunities for new, allotments, city farms and community gardens, access to greenspace is being provided for residents. The creation of new greenspaces such as these should also support biodiversity through the creation of new habitats. The policy notes that any opportunities for biodiversity should be enhanced. Therefore, there is potential for a minor positive effect to be recorded.							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No														
	Conserve, enhance and repair natural and semi natural habitats?	No														
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No														
	Achieve biodiversity net gain (BNG) in new developments?	No														
	Provide new or improved access to greenspaces?	Yes														
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	Yes														

	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive		The policy supports objective IIA13 as the encouragement of food growth will help to provide soils in the Borough with nutrients, improving the overall quality of the soil. New proposals for allotments and gardens will also have to take soil quality and land contamination into account when decided on locations for development. Therefore, there is potential for a minor positive effect to be recorded.			
Avoid development of greenfield land?	No												
Promote the efficient use of minerals?	Yes												
Protect soil quality and avoid soil pollution?	Yes												
Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No												
Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No												
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage new developments to provide adequate space for waste separation?	No											
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	Strategic Policy 08: Responding to the Climate and Nature Emergency
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	A in compliance with the Council's Climate and Nature Strategy (2023-30), all development in Harrow must be undertaken in accordance with sustainable development practices, and positively manage natural capital for the benefit of current and future generations. Development must contribute to achieving the following objectives: clean energy used efficiently; green mobility; waste-free economy; and healthy places for us and nature.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Assessment								
									Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of new low carbon development and renewable energy infrastructure in line with Policy CN12, which should in turn create a number of full and part time jobs for the local community. As such, a potential minor positive effect has been recorded.	Yes							
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible					Minor Positive	This policy supports the achievement of IIA4 as it promotes health and wellbeing through an increase in green mobility and a healthier natural environment. The policy specifies that active and low carbon transport options, for instance walking, cycling and public transport, will be promoted which should lead to more opportunity for active travel. Additionally, the policy states that proposals must contribute to a more healthy, resilient natural environment which should in turn present greater opportunities for residents to directly connect with the natural world, improving health and wellbeing including that of residents mental wellbeing. Furthermore, a healthy natural environment should aid the reduction of air pollutants that cause physical health issues such as asthma. By reducing these pollutants, there will likely in turn be a reduction in respiratory issues amongst the population. As such, a potential minor positive effect has been recorded.	No		
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		Yes															
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. The policy has been subject to a viability assessment and should not affect the delivery of housing. Therefore a neutral effect is predicted.	No						
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	High	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Significant Positive	This policy supports the achievement of IIA6 through its promotion of green mobility across the district. The policy prioritises active and low carbon transport which will increase sustainable travel habits, and aims to reduce fossil fuel vehicle journeys, supporting necessary ongoing private vehicular travel needs by facilitating and encouraging car-sharing and electric vehicle usage. This will have a potential significant effect on sustainable travel within the Borough.	Yes							
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	Yes															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Low	Long (20+ yrs)	Localised	Permanent/Reversible	Minor Positive	This policy supports the achievement of IIA7 through the minimisation of light and noise pollution, and improvement of air quality across the Borough through improvements in sustainable transport and access to nature. This will have a potential minor positive effect.	No							
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	Yes															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	Yes	Direct	High	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Significant Positive	This policy supports the achievement of IIA8 by minimising the Boroughs contribution towards the emission of climate change gases through the use of low carbon technology. The policy states that developments must make the fullest possible contribution to reducing greenhouse gas emissions in both the construction and operational phases by maximising energy efficiency and conservation measures, whilst prioritising the use of low carbon heating, renewable energy solutions and local renewable energy generation in line with Policy CN2 (Energy Infrastructure). It will also be ensured that all new housing is net zero carbon in line with Policy CN1 (Sustainable Design and Retrofitting) by minimising embodied carbon through sustainably sourced materials and construction techniques, green mobility will be prioritised in order to reduce vehicular emissions, and waste will be re-used and recycled as part of the circular economy. As such, a potential significant positive effect has been identified.	No							
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes															
	Promote a low carbon local economy?	Yes															
	Ensure new developments are energy efficient?	Yes															
	Minimise greenhouse gas emissions?	Yes															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	High	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA9 through the specification for plans to have sustainable design which increases the resilience of people and places from climate risks including drought, overheating, storm and flooding events. This should achieve a potential minor positive effect.	Yes							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Minor Positive	This policy works towards achieving IIA10 through the positive management of natural capital and contribution towards building a healthier, more resilient and thriving local natural environment by increasing levels of biodiversity, improving the integrity of ecosystems, and protecting and enhancing carbon storage in the local natural environment. Therefore, a potential minor positive effect has been identified.	Yes							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes															
	Conserve, enhance and repair natural and semi-natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No															
	Achieve biodiversity net gain (BNG) in new developments?	Yes															
	Provide new or improved access to greenspaces?	No															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No															
	Protect sites of geological importance?	No															

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	No										
	Encourage heritage-led regeneration?	No										
	Help provide solutions to those assets on the Heritage at Risk register?	No										
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Promote high quality and contextually successful design?	No										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
	Protect sensitive areas and protected views?	No										
	Safeguard landscape and townscape features such as trees?	No										
		No										
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	Direct	Low	Long (20+yrs)	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA13 through the requirement to improve air, water and soil quality in line with contributions to a healthier local natural environment. As such, a potential minor positive effect has been recorded.	No		A potential enhancement for this policy could be the specification that a sustainable use of materials and/or resources would be required.
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	Yes										
	Protect soil quality and avoid soil pollution?	Yes										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	Yes										
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No										
		No										
<b>IIA14 Waste:</b> To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	Indirect	Low	Long (20+yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA14 through the promotion of the concepts of the circular economy. The policy ensures developments are capable of being easily altered and adapted for future needs to ensure the fullest possible utilisation during their lifetime, which encourages the repurposing of existing space. As such, a potential minor positive effect has been recorded.	No		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	Yes										
	Ensure waste is dealt with in line with circular economy principles?	Yes										
		No										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA6: This policy supports the achievement of IIA6 through its promotion of green mobility across the district. The policy prioritises active and low carbon transport which will increase sustainable travel habits, and aims to reduce fossil fuel vehicle journeys, supporting necessary ongoing private vehicular travel needs by facilitating and encouraging car-sharing and electric vehicle usage. This will have a potential significant effect on sustainable travel within the Borough.  
 IIA8: This policy supports the achievement of IIA8 by minimising the Boroughs contribution towards the emission of climate change gasses through the use of low carbon technology. The policy states that developments must make the fullest possible contribution to reducing greenhouse gas emissions in both the construction and operational phases by maximising energy efficiency and conservation measures, whilst prioritising the use of low carbon heating, renewable energy solutions and local renewable energy generation in line with Policy CN2 (Energy Infrastructure). It will also be ensured that all new housing is net zero carbon in line with Policy CN1 (Sustainable Design and Retrofitting) by minimising embodied carbon through sustainably sourced materials and construction techniques, green mobility will be prioritised in order to reduce vehicular emissions, and waste will be re-used and recycled as part of the circular economy. As such, a potential significant positive effect

Potential Cumulative Effects Identified

Mitigation

IIA13:A potential enhancement for this policy could be the specification that a sustainable use of materials and/or resources would be required.

Policy/Alternative name	CN1 Sustainable Design and Retrofitting
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	The policy outlines that all new buildings should be designed and built to be Net Zero Carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no gas connection, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings.
Assumptions Made	None.

IIA framework			Assessment																				
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of world class infrastructure through the requirement to ensure all new buildings are of a sustainable nature, and by the requirement they must obtain an 'Excellent' BREEM certification for domestic and non-domestic refurbishment. As such, a potential minor positive effect has been determined.	No													
	Support the provision of world class infrastructure and connectivity?	Yes																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of new low carbon infrastructure, which should in turn create a number of full and part time jobs for the local community. As such, a potential minor positive effect has been recorded.	Yes													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	Yes													
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse / discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											No	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA4 as it promotes the provision of new low carbon infrastructure and well designed buildings which may have a positive effect on health and wellbeing, including that of mental wellbeing. As such, a potential minor positive effect has been recorded.	No		
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No												
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?		N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted. However, an enhancement measure has been identified which could improve the performance of this policy against IIA6.	No		A potential enhancement to this policy could be the introduction of sustainable travel within design e.g., the increase in EV charging points included within new development.											
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	No																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No													
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	Yes	Direct	High	Long (20+yrs)	borough Wide	Permanent/Reversible	Significant Positive	The policy supports the achievement of the IIA8 objective through its contribution to the reduction of greenhouse gases and energy efficiency measures through design and retrofitting. The policy indicates that all new buildings will have purpose led, ultra low energy design that will contribute to utilising low carbon heat, the generation of renewable energies, and have low levels of embodied carbon. These support the delivery of low carbon energy capacity in line with the London Plan (2021), and help achieve the Councils Net Zero aspirations by 2030 where all new buildings in Harrow are required to be Net Zero. High standards of sustainable design, including specified space heating demand and energy use intensity figures have been identified, to ensure energy efficiency and reduce greenhouse gas emissions. In addition, the policy outlines the importance of minimising water usage within new buildings through ensuring they minimise the use of mains water and achieving a maximum consumption of 105 litres per head per day. Furthermore, development proposals for the refurbishment or retrofit of all buildings should achieve a certified 'excellent' BREEM rating for water consumption unless it can be demonstrated that it is not feasible. As such, a potential significant positive effect has been identified.	Yes													
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	Yes																					
	Minimise greenhouse gas emissions?	Yes																					

IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	Direct	Medium	Long (20+yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of the IIA9 objective through the promotion of new buildings designed and built in line with Net Zero carbon standards. This aligns with the requirement of green infrastructure, and therefore a potential minor positive effect has therefore been recorded.	Yes		
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No										
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes										
IIA10 Biodiversity: To safeguard and enhance biodiversity and good diversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	Indirect	Medium	Long (20+yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy highlights that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for biodiversity and landscapes. As such, a minor positive effect has been recorded.	Yes		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes										
	Conserve, enhance and repair natural and semi-natural habitats?	No										
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No										
	Achieve biodiversity net gain (BNG) in new developments?	No										
	Provide new or improved access to greenspaces?	No										
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No	Indirect	Medium	Long (20+yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy highlights that proposals for retrofit of existing buildings must consider impacts on the historic environment and heritage assets, therefore indirectly aiding the conservation of their settings. The policy also states that Historic England guidelines should be considered when retrofitting older buildings. As such, a minor potential positive effect has been recorded.	Yes		
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes										
	Maintain and enhance access to cultural heritage assets?	No										
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No										
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No										
	Improve the condition of the historic environment?	Yes										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Encourage heritage-led regeneration?	No	Direct	Low	Long (20+yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA12 through the promotion of high quality sustainable design. The policy states that high standards of sustainable design are expected of all new development, retrofit, conversion and refurbishment, and all buildings must operate to an 'Excellent' BREEAM Standard. The policy specifies that proposals must additionally consider impacts on the historic environment and amenity of the buildings users and neighbours, therefore protecting the current land and townscape character. As such, a potential minor positive effect has been recorded.	Yes		
	Help provide solutions to those assets on the Heritage at Risk register?	No										
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No										
	Promote high quality and contextually successful design?	Yes										
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No										
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Protect sensitive areas and protected views?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Safeguard landscape and townscape features such as trees?	No										
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No										
	Avoid development of greenfield land?	No										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No										
Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage new developments to provide adequate space for waste separation?	No										
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No										
	Ensure waste is dealt with in line with circular economy principles?	No										
Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA8: The policy supports the achievement of the IIA8 objective through its contribution to the reduction of greenhouse gasses and energy efficiency measures through design and retrofitting. The policy indicates that all new buildings will have purpose led, ultra low energy design that will contribute to utilising low carbon heat, the generation of renewable energies, and have low levels of embodied carbon. These support the delivery of low carbon energy capacity in line with the London Plan (2021), and help achieve the Councils Net Zero aspirations by 2030 where all new buildings in Harrow are required to be Net Zero. High standards of sustainable design, including specified space heating demand and energy use intensity figures have been identified, to ensure energy efficiency and reduce greenhouse gas emissions. In addition, the policy outlines the importance of minimising water usage within new buildings through ensuring they minimise the use of mains water and achieving a maximum consumption of 105 litres per head per day. Furthermore, development proposals for the refurbishment or retrofit of all building should achieve a certified 'excellent' BREEAM rating for water consumption unless it can be demonstrated that it is not feasible. As such, a potential significant positive effect has been identified.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA6: A potential enhancement to this policy could be the introduction of sustainable travel within design e.g., the increase in EV charging points included within new development.

Policy/Alternative name	CN2 Energy Infrastructure
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	The policy outlines requirements and recommendations related to energy infrastructure.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment			
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	Yes			
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	No											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	Medium	Long (20+yrs)	Localised	Permanent/Irreversible	Minor Positive	This policy supports the achievement of IIA2 as it promotes the provision of energy infrastructure, for instance the installation of wind turbines, which will in turn create a number of full and part time jobs for the local community. As such, a minor positive effect has been identified.	Yes			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No											
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	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?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
	Increase the number of additional homes delivered to meet local needs/targets?	No											
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Provide affordable homes of the tenure and size to meet the identified needs?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No											
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Improve existing cycling and walking network and provide new routes?	No	Indirect	N/A	N/A	N/A	N/A	Minor Positive	As a result of the promotion of EV charging infrastructure within the policy, there is likely be an increase in sustainable travel through greater accessibility to charging points. This works towards the achievement of IIA6 and therefore a minor positive effect has been recorded.	No			
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes											
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes											
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
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	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)?	Yes	Indirect	N/A	N/A	N/A	N/A	Minor Positive	As a result of the promotion of EV charging infrastructure, there is likely be an increase in low emissions vehicle usage which will in turn improve air quality. This indirectly supports IIA7 and therefore a potential minor positive effect has been recorded.	No			
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes											
	Promote a low carbon local economy?	Yes											
	Ensure new developments are energy efficient?	Yes											
	Minimise greenhouse gas emissions?	Yes											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	Yes	Direct	High	Long (20+yrs)	borough Wide	Permanent/Irreversible	Significant Positive	The policy contributes significantly to the achievement of IIA8 by supporting the delivery of renewable and low carbon capacity in the district. This will be in line with the London Plan (2021), as proposals must adhere to low-temperature heating systems, heating hierarchy, and future connection to heating system requirements. The promotion of the most effective and energy efficient supply options that are available, and maximisation of onsite renewable energy generation has been stated, ensuring that current and future developments will be energy efficient and reduce associated greenhouse gas emissions. The policy also states how EV charging infrastructure will be provided, promoting a shift to low emission vehicles. As such, a potential significant positive effect has been identified.	No			
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes											
	Promote a low carbon local economy?	Yes											
	Ensure new developments are energy efficient?	Yes											
	Minimise greenhouse gas emissions?	Yes											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
	Avoid adverse effects on European designated habitats/sites?	No											
		No	Indirect	Low	Long	Localised	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA10 through the requirement that new	No		The policy could perform	



<b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes			(20+yrs)		rsible	renewable energy infrastructure, such as Solar PV, must be low-lying and unobtrusive, particularly in conservation areas.	more positively if it promoted biodiversity improvements and supported BNG delivery in tandem with renewable energy developments e.g. delivering biodiversity improvements where Solar PV or wind turbine infrastructure are implemented.
	Conserve, enhance and repair natural and semi-natural habitats?	No							
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No							
	Achieve biodiversity net gain (BNG) in new developments?	No							
	Provide new or improved access to greenspaces?	No							
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No							
<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No						Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A		
	Maintain and enhance access to cultural heritage assets?	No							
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No							
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No							
	Improve the condition of the historic environment?	No							
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Encourage heritage-led regeneration?	No						Minor Positive	The policy supports the achievement of IIA12 as it states that new renewable energy infrastructure must be low-lying and visually unobtrusive where possible, which will in turn respect the local landscape and townscape and prevent a negative visual impact. As such, a potential minor positive impact has been determined.
	Help provide solutions to those assets on the Heritage at Risk register?	No							
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	High	Long (20+yrs)	Localised	Permanent/Irreversible		
	Promote high quality and contextually successful design?	Yes							
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	Yes							
	Protect sensitive areas and protected views?	Yes							
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	Yes						Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A		
	Avoid development of greenfield land?	No							
	Promote the efficient use of minerals?	No							
	Protect soil quality and avoid soil pollution?	No							
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No							
<b>IIA14 Waste:</b> To minimise waste.	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No						Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No							
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No							

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA8: The policy contributes significantly to the achievement of IIA8 by supporting the delivery of renewable and low carbon capacity in the district. This will be in line with the London Plan (2021), as proposals must adhere to low-temperature heating systems, heating hierarchy, and future connection to heating system requirements. The promotion of the most effective and energy efficient supply options that are available, and maximisation of onsite renewable energy generation has been stated, ensuring that current and future developments will be energy efficient and reduce associated greenhouse gas emissions. The policy also states how EV charging infrastructure will be provided, promoting a shift to low emission vehicles. As such, a potential significant positive effect has been identified.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA10: The policy could perform more positively if it promoted biodiversity improvements and supported BNG delivery in tandem with renewable energy developments e.g. delivering biodiversity improvements where Solar PV or wind turbine infrastructure are implemented.

Policy/Alternative name	CN3 Reducing Flood Risk
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	The policy outlines requirements and recommendations related to reducing flood risk.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Assessment			
									Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	N/A	N/A	N/A	N/A	Minor Positive	The policy will indirectly contribute to the achievement of IIA1 as by managing flood risk more effectively the risk of impact on the Boroughs business activities will be reduced, and therefore the economic risk also reduces. As such, a minor positive effect has been determined.	Yes		
	Support the provision of world class infrastructure and connectivity?	No										
	Support flexible working practices?	No										
	Protect and retain an adequate supply of employment floor space to address business needs?	No										
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No										
	Safeguard existing town centres?	Yes										
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No										
	Improve existing shopping facilities within town centres and neighbourhood parades?	No										
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No										
Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of new or enhanced community and health facilities?	No										
	Help ensure all children have access to a local school within reasonable walking distance?	No										
	Increase education facility provision for children with learning disabilities?	No										
	Ensure local facilities have capacity to accommodate proposed development?	No										
	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?	No										
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No										
	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?	No										
		No										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Indirect	N/A	N/A	N/A	N/A	Minor Positive	By reducing flood risk in the Borough, the likelihood of a major floor event occurring will be lessened, and therefore safeguard peoples homes, businesses, and health. As such, this policy indirectly helps to achieve IIA4 and therefore a minor positive effect has been identified.	Yes		
	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?	No										
	Increase and improve opportunities for active travel including walking and cycling?	No										
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No										
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No										
	Increase provision of private amenity space?	No										
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No										
	Ensure all representative groups will be consulted and engaged with?	No										
		No										
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No										
	Provide affordable homes of the tenure and size to meet the identified needs?	No										
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No										
	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?	No										
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No										
	Improve existing cycling and walking network and provide new routes?	No										
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No										
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
	Support the shift towards usage of electric and ultralow emissions vehicles?	No										
	Promote a low carbon local economy?	No										
	Ensure new developments are energy efficient?	No										
	Minimise greenhouse gas emissions?	No										
Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	High	Short (<5yrs)	borough Wide	Permanent/Reversible	Significant Positive	The policy supports the achievement of IIA9 through the provision to reduced flood risk in the Borough. The policy states that proposals must demonstrate that development will be resistant and resilient to all sources of flooding, and whilst	No			
Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes											

<p><b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</p>	<p>Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?</p>	<p>Yes</p>							<p>minimising the flood risk on site. There should also not be an increased flood risk elsewhere and ensure that if flooding was to occur there is an appropriate escape plan in place. It has been stated that proposals must undergo a sequential, risk-based approach to the location of development with the aim of avoiding possible flood risk to people and property and take the impacts of climate change into account, and applicants should consider the findings of the West London Strategic Flood Risk Assessments. Consideration should be given to areas within the functional floodplain which represents the most serious and frequent risk of flooding. Furthermore, proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be refused. As such, a potential significant positive effect has been recorded.</p>			
<p><b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.</p>	<p>Avoid adverse effects on European designated habitats sites? No          Conserve, enhance and repair nationally and locally designated wildlife sites? No          Conserve, enhance and repair natural and semi natural habitats? Yes          Contribute to the delivery of new or safeguard existing BAP priority species and habitats? No          Achieve biodiversity net gain (BNG) in new developments? No          Provide new or improved access to greenspaces? No          Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)? No          Protect sites of geological importance? No</p>	<p>Indirect</p>	<p>Medium</p>	<p>Long (20+yrs)</p>	<p>Borough Wide</p>	<p>Permanent/Reversible</p>	<p>Minor Positive</p>	<p>The proposal discusses using natural flood risk methods, which may be beneficial for habitat and species conservation and could lead to BNG within the area. As such, the policy indirectly promotes IIA10 and therefore a minor positive effect has been recorded.</p>	<p>No</p>			
<p><b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</p>	<p>Conserve and/or enhance heritage assets, historic environment, and their settings? No          Maintain and enhance access to cultural heritage assets? No          Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context? No          Contribute to the better management of heritage assets and contribute to conserving heritage at risk? No          Improve the condition of the historic environment? No          Encourage heritage led regeneration? No          Help provide solutions to those assets on the Heritage at Risk register? No</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Neutral</p>	<p>The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.</p>	<p>No</p>			
<p><b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character</p>	<p>Respect, maintain and strengthen local landscape and townscape character and distinctiveness? No          Promote high quality and contextually successful design? No          Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact? No          Protect sensitive areas and protected views? No          Safeguard landscape and townscape features such as trees? No</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Neutral</p>	<p>The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.</p>	<p>No</p>			
<p><b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</p>	<p>Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored? No          Avoid development of greenfield land? No          Promote the efficient use of minerals? No          Protect soil quality and avoid soil pollution? No          Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments? No          Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies? Yes          Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs? Yes</p>	<p>Indirect</p>	<p>Medium</p>	<p>Long (20+yrs)</p>	<p>Borough Wide</p>	<p>Permanent/Reversible</p>	<p>Minor Positive</p>	<p>The policy indirectly achieves IIA13, as reducing flood risk in the Borough should in turn reduce the likelihood of soil and water pollution, therefore protecting natural resources. As such, a minor positive impact has been recorded.</p>	<p>No</p>			
<p><b>IIA14 Waste:</b> To minimise waste.</p>	<p>Encourage new developments to provide adequate space for waste separation? No          Encourage the repurposing and refurbishing of buildings, instead of demolition? No          Ensure waste is dealt with in line with circular economy principles? No          Safeguard existing waste management sites? No</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Neutral</p>	<p>The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.</p>	<p>No</p>			

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA9: The policy supports the achievement of IIA9 through the provision to reduced flood risk in the Borough. The policy states that proposals must demonstrate that development will be resistant and resilient to all sources of flooding, and whilst minimising the flood risk on site. There should also not be an increased flood risk elsewhere and ensure that if flooding was to occur there is an appropriate escape plan in place. It has been stated that proposals must undergo a sequential, risk-based approach to the location of development with the aim of avoiding possible flood risk to people and property and take the impacts of climate change into account, and applicants should consider the findings of the West London Strategic Flood Risk Assessments. Consideration should be given to areas within the functional floodplain which represents the most serious and frequent risk of flooding. Furthermore, proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be refused. As such, a potential significant positive effect has been recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	CN4 Sustainable Drainage
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	The policy outlines that all development is required to reduce the risk of surface water flooding, through separation of foul and surface water flows and the incorporation of Sustainable Urban Drainage Systems.
Assumptions Made	None.

IIA objective	IIA framework								Assessment				
	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement	
<b>IIA1 Economy:</b> To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	N/A	N/A	N/A	N/A	Minor Positive	The policy will indirectly contribute to the achievement of IIA1 as by improving drainage and subsequently managing flood risk more effectively the risk of impact on the Boroughs Business activities will be reduced, and therefore the economic risk also reduces. As such a potential minor positive effect has been recorded.	No			
	Support the provision of world class infrastructure and connectivity?	No											
	Support flexible working practices?	No											
	Protect and retain an adequate supply of employment floor space to address business needs?	No											
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No											
	Safeguard existing town centres?	Yes											
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No											
	Improve existing shopping facilities within town centres and neighbourhood parades?	No											
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No											
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No											
<b>IIA2 Employment:</b> To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No											
<b>IIA3 Accessibility:</b> To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: oeducation facilities? orecreation facilities? ohealth services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase the delivery of new or enhanced community and health facilities?	No											
	Help ensure all children have access to a local school within reasonable walking distance?	No											
	Increase education facility provision for children with learning disabilities?	No											
	Ensure local facilities have capacity to accommodate proposed development?	No											
	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?	No											
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No											
	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?	No											
		No											
		No											
<b>IIA4 Health and Wellbeing:</b> Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	Indirect	N/A	N/A	N/A	N/A	Minor Positive	By reducing flood risk in the Borough, the likelihood of a major floor event occurring will be lessened, and therefore safeguard peoples homes, businesses, and health. As such the policy works towards IIA4 and a potential minor positive effect has been identified.	No			
	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?	No											
	Increase and improve opportunities for active travel including walking and cycling?	No											
	Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?	No											
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No											
	Increase provision of private amenity space?	No											
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No											
	Ensure all representative groups will be consulted and engaged with?	No											
		No											
		No											
<b>IIA5 Housing:</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	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No											
	Provide affordable homes of the tenure and size to meet the identified needs?	No											
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No											
	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?	No											
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No											
<b>IIA6 Sustainable Travel:</b> To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No											
	Improve existing cycling and walking network and provide new routes?	No											
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No											
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No											
		No											
<b>IIA7 Air, Light and Noise Pollution:</b> To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No											
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Support the shift towards usage of electric and ultralow emissions vehicles?	No											
	Promote a low carbon local economy?	No											
	Ensure new developments are energy efficient?	No											
	Minimise greenhouse gas emissions?	No											
<b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	High	Long (20+ yrs)	Regional	Permanent/ Irreversible	Significant Positive	This policy achieves IIA9 as the development of sustainable urban drainage systems will reduce the risk of flooding in the borough through mitigative measures. This is because drainage helps to control discharge rates, reduce surface and storm water run off and ensure the storage and passage of flood water in excessive events. The policy also incorporates the use of Sustainable Urban Drainage Systems (SuDS) which could create a connected network of green and blue infrastructure across the Borough and wider area. In addition, rainwater should be utilised as a resource where feasible through rainwater harvesting and blue roofs. The policy also states that greenfield run off rates must be achieved. As such, a potential significant positive effect has been identified.	Yes			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes											

<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>	<b>Avoid adverse effects on European designated habitats sites?</b> <b>Conserve, enhance and repair nationally and locally designated wildlife sites?</b> <b>Conserve, enhance and repair natural and semi-natural habitats?</b> <b>Contribute to the delivery of new or safeguard existing BAP priority species and habitats?</b> <b>Achieve biodiversity net gain (BNG) in new developments?</b> <b>Provide new or improved access to greenspaces?</b> <b>Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?</b> <b>Protect sites of geological importance?</b>	No No No No No No No	Indirect	N/A	N/A	N/A	N/A	Minor Positive	The policy works towards the achievement of IIA10 through the design and implementation of drainage systems being built with safeguarding biodiversity in mind. The policy states that urban drainage should be designed and implemented in a manner that promotes multiple benefits, including enhancing biodiversity and urban greening. The policy states there is also a strong preference of green over grey drainage features, and approaches such as SuDS that consider biodiversity are considered best practice. As such, a potential minor positive effect has been determined.	No						
	<b>IIA11 Historic Environment:</b> <b>To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings</b>	<b>Conserve and/or enhance heritage assets, historic environment, and their settings?</b> <b>Maintain and enhance access to cultural heritage assets?</b> <b>Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?</b> <b>Contribute to the better management of heritage assets and contribute to conserving heritage at risk?</b> <b>Improve the condition of the historic environment?</b> <b>Encourage heritage led regeneration?</b> <b>Help provide solutions to those assets on the Heritage at Risk register?</b>	No No No No No No No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No					
		<b>IIA12 Landscape and Townscape:</b> <b>To conserve and enhance the borough's landscape and townscape character</b>	<b>Respect, maintain and strengthen local landscape and townscape character and distinctiveness?</b> <b>Promote high quality and contextually successful design?</b> <b>Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?</b> <b>Protect sensitive areas and protected views?</b> <b>Safeguard landscape and townscape features such as trees?</b>	No No No No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No				
			<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>	<b>Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?</b> <b>Avoid development of greenfield land?</b> <b>Promote the efficient use of minerals?</b> <b>Protect soil quality and avoid soil pollution?</b> <b>Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?</b> <b>Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?</b> <b>Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?</b>	No No No Yes Yes Yes Yes	Direct	High	Short (<5yrs)	borough Wide	Permanent/Reversible	Significant Positive	The policy works towards the achievement of IIA13 through the necessity to protect soil and water pollution through the efficient reduction in flood risk through sustainable drainage design. Approaches that manage pollution are considered best practise, and drainage strategies that ensure run off is clean and safe to minimise water quality impacts are required. The policy also highlights that adequate arrangements are in place to ensure separation of surface and foul water systems, to prevent this risk further. As a result, a potential significant positive effect has been identified.	No			
				<b>IIA14 Waste:</b> <b>To minimise waste.</b>	<b>Encourage new developments to provide adequate space for waste separation?</b> <b>Encourage the repurposing and refurbishing of buildings, instead of demolition?</b> <b>Ensure waste is dealt with in line with circular economy principles?</b> <b>Safeguard existing waste management sites?</b>	No No No No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA9: This policy achieves IIA9 as the development of sustainable urban drainage systems will reduce the risk of flooding in the borough through mitigative measures. This is because drainage helps to control discharge rates, reduce surface and storm water run off and ensure the storage and passage of flood water in excessive events. The policy also incorporates the use of Sustainable Urban Drainage Systems (SuDS) which could create a connected network of green and blue infrastructure across the Borough and wider area. In addition, rainwater should be utilised as a resource where feasible through rainwater harvesting and blue roofs. The policy also states that greenfield run off rates must be achieved. As such, a potential significant positive effect has been identified.

IIA13: The policy works towards the achievement of IIA13 through the necessity to protect soil and water pollution through the efficient reduction in flood risk through sustainable drainage design. Approaches that manage pollution are considered best practise, and drainage strategies that ensure run off is clean and safe to minimise water quality impacts are required. The policy also highlights that adequate arrangements are in place to ensure

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	CNS Waterway Management
Chapter	Chapter D8: Responding to the Climate and Nature Emergency
Policy/alternative description	The policy outlines that development proposals should seek to maximise the multifunctional social, economic and environmental benefits of rivers and waterways
Assumptions Made	None.

IIA framework		Assessment															
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	Yes	Indirect	N/A	N/A	N/A	N/A	Minor Positive	An increase in the management of waterways may introduce new job opportunities into the Borough and therefore should have a positive impact on employment rates. As such, this has an indirect impact on IIA2 and therefore a potential minor positive effect has been determined.	No							
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse / discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A					Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		No															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No						
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No														
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	No															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No							
	Support the shift towards usage of electric and ultra low emissions vehicles?	No															
	Promote a low carbon local economy?	No															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	No															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Low	Long (20+ yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of IIA9 through the increase in waterway management across the Borough. It states that where feasible, a scheme for restoring culverted sections of river or watercourse should occur which must include an adequate buffer for flooding, therefore mitigating the flood risk to development within in the Borough. There must be an undeveloped buffer zone of 8 metres of a main river, and 5 metres of an ordinary watercourse, to mitigate the risk of flooding. As a result, a potential minor positive impact has been recorded.	Yes							
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	Yes															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	Yes															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	Yes	Direct	Medium	Long (20+ yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy supports the achievement of IIA10 through the proposed implementation of environmental enhancements to open sections of river or watercourse and the restoration of the watercourse back to a more natural state, which should in turn improve biodiversity. This is because watercourses are valued as an important resource both for biodiversity and for sustainable flood management. It is additionally stated that any activities or developments within an area of river, watercourse or water body must not cause deterioration and should enhance the condition of the river, watercourse or water body. Specifically, activities and developments should achieve 'good ecological status or	Yes							
	Conserve, enhance and repair nationally and locally designated wildlife sites?	Yes															
	Conserve, enhance and repair natural and semi natural habitats?	Yes															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	Yes															
	Achieve biodiversity net gain (BNG) in new developments?	Yes															
	Provide new or improved access to greenspaces?	No															
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No															



Policy/Alternative name	Strategic Policy 09: Managing Waste and Supporting the Circular Economy
Chapter	Chapter 09: Managing Waste and the Circular Economy
Policy/Alternative description	The policy outlines how the Council supports sustainable waste management and will aim to reduce waste created within the Borough, as well as incorporate the principles of the circular economy where possible. Existing waste sites will be safeguarded and the loss of any waste management sites should be compensated for.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment					
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement			
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the provision of world class infrastructure and connectivity?	No													
	Support flexible working practices?	No													
	Protect and retain an adequate supply of employment floor space to address business needs?	No													
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No													
	Safeguard existing town centres?	No													
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No													
	Improve existing shopping facilities within town centres and neighbourhood parades?	No													
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No													
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No													
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No													
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Increase the delivery of new or enhanced community and health facilities?	No													
	Help ensure all children have access to a local school within reasonable walking distance?	No													
	Increase education facility provision for children with learning disabilities?	No													
	Ensure local facilities have capacity to accommodate proposed development?	No													
	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?	No													
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No													
	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?	No													
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A				Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
		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?	No												
Increase and improve opportunities for active travel including walking and cycling?		No													
Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?		No													
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No													
Increase provision of private amenity space?		No													
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No													
Ensure all representative groups will be consulted and engaged with?		No													
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No												
	Provide affordable homes of the tenure and size to meet the identified needs?	No													
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No													
	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?	No													
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No													
	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral				The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
Encourage intensification in existing residential areas in the most accessible locations within the borough?		No													
Improve existing cycling and walking network and provide new routes?		No													
Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?		No													
Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?		No													
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No													
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No													
	Promote a low carbon local economy?	No													
	Ensure new developments are energy efficient?	No													
	Minimise greenhouse gas emissions?	No													
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No													
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No													
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No													
	Conserve, enhance and repair natural and semi-natural habitats?	No													
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No													
	Achieve biodiversity net gain (BNG) in new developments?	No													
	Provide new or improved access to greenspaces?	No													
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No													
	Protect sites of geological importance?	No													
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No													
	Maintain and enhance access to cultural heritage assets?	No													
		No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
		No													



<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No								
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No								
	Improve the condition of the historic environment?	No								
	Encourage heritage-led regeneration?	No								
	Help provide solutions to those assets on the Heritage at Risk register?	No								
<b>IIA12 Landscape and Townscape:</b> To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports this IIA objective as it states that developments should be designed appropriately and positively contribute to local character. Therefore, there is potential for a minor positive effect to be recorded.	
	Promote high quality and contextually successful design?	No								
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No								
	Protect sensitive areas and protected views?	No								
	Safeguard landscape and townscape features such as trees?	No								
<b>IIA13 Soils and Water:</b> To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
	Avoid development of greenfield land?	No								
	Promote the efficient use of minerals?	No								
	Protect soil quality and avoid soil pollution?	No								
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No								
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No								
<b>IIA14 Waste:</b> To minimise waste.	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Irreversible	Significant Positive	The policy provides support for this IIA objective as it highlights that waste creation in the Borough should be minimised, and waste self-sufficiency promoted in line with London Plan Policy S18. The policy also requires all new major developments to manage waste at each stage of development. This suggests that building materials should be repurposed, and buildings refurbished, where possible. Additionally, developments should utilise circular economy principles and encourage recycling and re-use of materials in accordance with the London Plan Policy S17. Finally, existing waste sites will be safeguarded through the policy. If any waste sites are lost, the policy provides mitigation through the provision of compensatory land with equal or greater waste management capacity. Harrow will work with partners in West London to identify and allocate suitable new sites for waste management. Therefore, there is potential for a significant positive effect to be recorded.	

Significant Negative and Uncertain Effects

#REF!

Significant Positive Effects

#REF!

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	CE1 Reducing and Managing Waste
Chapter	Chapter 09: Managing Waste and the Circular Economy
Policy/alternative description	The policy outlines how the all development proposals will be required to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting. Proposals for major developments should also incorporate the principles of the circular economy and aim to be net zero waste. Expectations are included for flats, and other types of residential development proposals.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment					
			Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement			
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the provision of world class infrastructure and connectivity?	No													
	Support flexible working practices?	No													
	Protect and retain an adequate supply of employment floor space to address business needs?	No													
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No													
	Safeguard existing town centres?	No													
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No													
	Improve existing shopping facilities within town centres and neighbourhood parades?	No													
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No													
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No													
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No													
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Increase the delivery of new or enhanced community and health facilities?	No													
	Help ensure all children have access to a local school within reasonable walking distance?	No													
	Increase education facility provision for children with learning disabilities?	No													
	Ensure local facilities have capacity to accommodate proposed development?	No													
	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?	No													
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No													
	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?	No													
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No	N/A	N/A	N/A	N/A	N/A				Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
		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?	No												
Increase and improve opportunities for active travel including walking and cycling?		No													
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No													
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No													
Increase provision of private amenity space?		No													
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No													
Ensure all representative groups will be consulted and engaged with?		No													
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No												
	Provide affordable homes of the tenure and size to meet the identified needs?	No													
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No													
	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?	No													
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No													
	Improve existing cycling and walking network and provide new routes?	No													
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No													
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No													
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Direct	Low	Medium (10yrs)	borough Wide	Permanent/Reversible	Minor Positive	The policy highlights that the provision for waste facilities within developments must be located and screened to mitigate any noise impacts. Therefore, there is potential for a minor positive effect to be recorded.						
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No													
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Support the shift towards usage of electric and ultra-low emissions vehicles?	No													
	Promote a low carbon local economy?	No													
	Ensure new developments are energy efficient?	No													
	Minimise greenhouse gas emissions?	No													
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No													
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No													
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No													
	Conserve, enhance and repair natural and semi-natural habitats?	No													
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No													
	Achieve biodiversity net gain (BNG) in new developments?	No													
	Provide new or improved access to greenspaces?	No													
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No													
	Protect sites of geological importance?	No													
IIA11 Cultural Heritage: To conserve and enhance heritage assets, historic environment, and their settings?	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.						
	Maintain and enhance access to cultural heritage assets?	No													



Policy/Alternative name	CE2 Design to Support the Circular Economy
Chapter	Chapter 09: Managing Waste and the Circular Economy
Policy/alternative description	The policy outlines how the development proposals should incorporate the principles of the circular economy throughout construction and operation. Major developments should aim to be net zero waste.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA Framework							Assessment				
			Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement		
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Support the provision of world class infrastructure and connectivity?	No												
	Support flexible working practices?	No												
	Protect and retain an adequate supply of employment floor space to address business needs?	No												
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No												
	Safeguard existing town centres?	No												
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No												
	Improve existing shopping facilities within town centres and neighbourhood parades?	No												
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No												
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No												
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No												
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: education facilities? recreation facilities? health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Increase the delivery of new or enhanced community and health facilities?	No												
	Help ensure all children have access to a local school within reasonable walking distance?	No												
	Increase education facility provision for children with learning disabilities?	No												
	Ensure local facilities have capacity to accommodate proposed development?	No												
	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?	No												
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No												
	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?	No												
	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	No												
	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?	No												
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve opportunities for active travel including walking and cycling?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No												
	Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing	No												
	Increase provision of private amenity space?	No												
	Encourage the protection of allotments and encourage the delivery of new spaces to grow food?	No												
	Ensure all representative groups will be consulted and engaged with?	No												
	Increase the number of additional homes delivered to meet local needs/targets?	No												
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No												
	Provide affordable homes of the tenure and size to meet the identified needs?	No												
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No												
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	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?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No												
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No												
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No												
	Improve existing cycling and walking network and provide new routes?	No												
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No												
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No												
	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	No	N/A	N/A	N/A	N/A	N/A	Neutral				The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No												
	IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	N/A	N/A	N/A	N/A	N/A				Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	
Support the shift towards usage of electric and ultra-low emissions vehicles?		No												
Promote a low carbon local economy?		No												
Ensure new developments are energy efficient?		No												
Minimise greenhouse gas emissions?		No												
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No												
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No												
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats/sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No												
	Conserve, enhance and repair natural and semi-natural habitats?	No												
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No												
	Achieve biodiversity net gain (BNG) in new developments?	No												
	Provide new or improved access to greenspaces?	No												
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No												
	Protect sites of geological importance?	No												
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No												
	Maintain and enhance access to cultural heritage assets?	No												
		No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.					



Policy/Alternative name	Strategic Policy 10 Movement
Chapter	Chapter 10: Transport and Movement
Policy/alternative description	The policy outlines that development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable, sustainable neighbourhoods, and mitigate their transport impacts through planning obligations.
Assumptions Made	None.

IIA framework			Assessment																				
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	Indirect	Medium	Medium/Long	Regional	Permanent/Irreversible	Minor Positive	The policy provides indirect support for the achievement of objective IIA as by improving the transport infrastructure in Harrow, the policy is also improving regional connectivity and infrastructure. This could subsequently support job creation and economic growth across London, as employment becomes more accessible. Therefore, there is potential for a minor positive effect to be recorded.														
	Support the provision of world class infrastructure and connectivity?																						
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The policy provides support for objective IIA3 as it aims to create a safe, inclusive and accessible transport system. Therefore, there is potential for a minor positive effect to be identified.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	Yes																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	Medium	Medium/Long	borough Wide	Permanent/Irreversible	Minor Positive	The policy provides support for this objective as it highlights that a Healthy Streets Approach will be applied to transport across the Borough. By increasing and improving opportunities for active travel across the Borough, residents will be encouraged to utilise walking and cycling as modes of transport. Improvements to road safety in line with the Mayor's Vision Zero objective, will take place in order to facilitate this. This will provide physical and mental benefits to residents, as well as ensure their safety is maximised whilst travelling within the Borough. The reduction in air pollution generated as a result of switching to active travel, public transport and electric vehicles as the main mode of travel within the Borough will also be beneficial to the health of residents. Therefore, there is potential for a minor positive effect to be recorded.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		Yes																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
		Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																				
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
	Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																					
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	High	Medium/Long	borough Wide	Permanent/Irreversible	Significant Positive	The policy supports the achievement of this IIA objective as it highlights that development proposals must facilitate improvements to transport infrastructure through active travel and public transport. Furthermore, improvements to public transport access will be carried out across the Borough, particularly in areas of deprivation and for people with disabilities. Proposals must comply with London Plan parking standards to reduce the land take needed for car parking. Improvements such as these should facilitate accessible, walkable and sustainable neighbourhoods. Development proposals must mitigate their transport impacts through planning obligations. Therefore, there is potential for a significant positive effect to be recorded.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes																					
	Improve existing cycling and walking network and provide new routes?	Yes																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Medium	Medium/Long	borough Wide	Permanent/Reversible	Minor Positive	The policy provides indirect support for objective IIA7 as by switching to low/zero carbon modes of transportation, air pollution generated by transport in the Borough should be minimised. Therefore, there is potential for a minor positive effect to be recorded.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	High	Medium/Long	National	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA8 through support for a switch to electric vehicles and car clubs, as well as active modes of travel. Low emission freight and delivery trips will also be supported. The incorporation of these changes into the transport infrastructure should minimise the carbon emissions produced by transport in the Borough, as well as contribute to national aims to reduce carbon emissions. Therefore, there is potential for a minor positive effect to be recorded.														
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	Yes																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No																					
	Avoid adverse effects on European designated habitats/sites?	No																					

IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Conserve, enhance and repair nationally and locally designated wildlife sites?	No								Neutral	IIA objective. Therefore a neutral effect is predicted.		
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A		Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	N/A		Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A					
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Avoid development of greenfield land?	No								Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A					
IIA14 Waste: To minimise waste.	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No								Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											
		No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA6: The policy supports the achievement of this IIA objective as it highlights that development proposals must facilitate improvements to transport infrastructure through active travel and public transport. Furthermore, improvements to public transport access will be carried out across the Borough, particularly in areas of deprivation and for people with disabilities. Proposals must comply with London Plan parking standards to reduce the land take needed for car parking. Improvements such as these should facilitate accessible, walkable and sustainable neighbourhoods. Development proposals must mitigate their transport impacts through planning obligations. Therefore, there is potential for a significant positive effect to be recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

Policy/Alternative name	M1 Sustainable Transport
Chapter	Chapter 10: Transport and Movement
Policy/alternative description	The policy outlines how development must enhance cycle and pedestrian connections, and other forms of sustainable travel. Safe and convenient access routes for pedestrians, cyclists and those with disabilities should be prioritised. Provision should be made for cycle parking.
Assumptions Made	None.

IIA framework			Assessment																				
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: o education facilities? o recreation facilities? o health services?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy provides support for objective IIA3 as it aims to create a safe and accessible cycle parking for all users. Additionally, new development should be designed in accordance with the London Plan's Healthy Streets approach, prioritising safe and convenient access routes for pedestrians, cyclists and those with disabilities. Therefore, there is potential for a minor positive effect to be identified.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	Yes																					
	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?	Yes																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy provides support for this objective as it highlights that a Healthy Streets Approach will be applied to transport across the Borough. By increasing and improving opportunities for active travel across the Borough, residents will be encouraged to utilise walking and cycling as modes of transport. Safe and convenient access routes will be prioritised for pedestrians, cyclists and those with disabilities. This will provide physical and mental benefits to residents, as well as ensure their safety is maximised whilst travelling within the Borough. The reduction in air pollution generated as a result of switching to active travel, public transport and electric vehicles as the main mode of travel within the Borough will also be beneficial to the health of residents. Finally, the provision of active transport facilities- such as showers, changing rooms and lockers- will increase the accessibility of active travel to more people. Therefore, there is potential for a minor positive effect to be recorded.			
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		Yes																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
		No																					
Ensure all representative groups will be consulted and engaged with?																							
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups		Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																					
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																						
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	Yes	Direct	High	Medium/L ong	Regional	Permanent/Irreversible	Significant Positive	The policy provides support for objective IIA6 as by improving transport infrastructure across the Borough, accessibility for residents to local destinations, town centres, transport hubs, schools and amenities is improved. This policy provides a specific focus on the provision of walking and cycling routes in and through the Borough. As well as improving the active transport infrastructure in Harrow, the policy is also improving regional active transport connectivity and infrastructure. The provision of modes of active travel should contribute to the reduction of road congestion, as residents will have more options to travel. Cycle parking will be provided by developments across the Borough, either meeting or exceeding requirements from the London Plan. Cycle parking will be accessible, and should include provision for the charging of electric bikes. Developments should also provide a contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes, where relevant. Major development proposals must carry out a Travel Plan and Transport Assessment that highlights that negative impacts on the transport network will be mitigated and that a modal shift away from private vehicles is supported. Therefore, there is potential for a significant positive effect to be recorded.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No																					
	Improve existing cycling and walking network and provide new routes?	Yes																					
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes																					
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The policy provides indirect support for objective IIA7 as by switching to low/zero carbon modes of transportation, air pollution generated by transport in the Borough should be minimised. Therefore, there is potential for a minor positive effect to be recorded.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	High	Medium/L ong	National	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA8 through support for low carbon, active modes of travel. The incorporation of these changes into the transport infrastructure should minimise the carbon emissions produced by transport in the Borough, as well as contribute to national aims to reduce carbon emissions. Therefore,			Enhancement: consideration of electric/hybrid vehicles would enhance this policy further.											
	Support the shift towards usage of electric and ultra low emissions vehicles?	No																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	No																					



Emission of climate change gases	Minimise greenhouse gas emissions?	Yes									there is potential for a minor positive effect to be recorded.		
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No											
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA6: The policy provides support for objective IIA6 as by improving transport infrastructure across the Borough, accessibility for residents to local destinations, town centres, transport hubs, schools and amenities is improved. This policy provides a specific focus on the provision of walking and cycling routes in and through the Borough. As well as improving the active transport infrastructure in Harrow, the policy is also improving regional active transport connectivity and infrastructure. The provision of modes of active travel should contribute to the reduction of road congestion, as residents will have more options to travel. Cycle parking will be provided by developments across the Borough, either meeting or exceeding requirements from the London Plan. Cycle parking will be accessible, and should include provision for the charging of electric bikes. Developments should also provide a contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes, where relevant. Major development proposals must carry out a Travel Plan and Transport Assessment that highlights that negative impacts on the transport network will be mitigated and that a modal shift away from private vehicles is supported. Therefore, there is potential for a significant positive effect to be recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA8: Enhancement: consideration of electric/hybrid vehicles would enhance this policy further.

Policy/Alternative name	M2 Parking
Chapter	Chapter 10: Transport and Movement
Policy/alternative description	The policy outlines that development proposals including motorcycle parking and EV charging will be supported. Any provision for parking should not impact on the character of the area or the vibrancy/viability of town centres.
Assumptions Made	None.

IIA objective	Assessment Questions	Assessment Question Screened in?	IIA framework							Assessment													
			Direct/Indirect	Magnitude	Duration	Spatial Extent	Permanence/Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement											
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
	Support the provision of world class infrastructure and connectivity?	No																					
	Support flexible working practices?	No																					
	Protect and retain an adequate supply of employment floor space to address business needs?	No																					
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No																					
	Safeguard existing town centres?	No																					
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No																					
	Improve existing shopping facilities within town centres and neighbourhood parades?	No																					
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No																					
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No																					
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.													
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No																					
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: education facilities? recreation facilities? health services?	No	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The policy supports objective IIA3 as it highlights that developments should consider safety, security and accessibility when planning the design and layout of parking areas (including those for scooters, motorcycles and bicycles). Therefore, there is potential for a minor positive effect to be recorded.														
	Increase the delivery of new or enhanced community and health facilities?	No																					
	Help ensure all children have access to a local school within reasonable walking distance?	No																					
	Increase education facility provision for children with learning disabilities?	No																					
	Ensure local facilities have capacity to accommodate proposed development?	No																					
	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?	No																					
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No																					
	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?	No																					
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?											Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports objective IIA4 as it highlights that developments in town centres should prioritise walking and cycling. Safety, security and accessibility should be considered when planning the design and layout of parking areas (including those for scooters, motorcycles and bicycles). Access to and from the public highway should maintain and, where necessary, give priority to the convenience of pedestrians and cyclists, in line with London Plan Policy T2, particularly through the installation of cycle lanes. Developments that would result in a risk to highway safety will be resisted. Therefore, there is potential for a minor positive effect to be recorded.			Enhancement: Consideration of any equality issues that may exist in relation to parking.
		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?											No										
Increase and improve opportunities for active travel including walking and cycling?		No																					
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No																					
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No																					
Increase provision of private amenity space?		No																					
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No																					
Ensure all representative groups will be consulted and engaged with?		No																					
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.														
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No																					
	Provide affordable homes of the tenure and size to meet the identified needs?	No																					
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No																					
	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?	No																					
Provide a range of different sized housing sites in order to maintain a stable supply and five year land supply of deliverable sites?	No																						
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?		Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible	Significant Positive	The policy supports objective IIA6 as it highlights that developments in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. Car free developments should be prioritised in areas that are well connected to public transport (PTAL 4-6). Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be encouraged. Proposals that make on-site provision for parking will be supported where the number of vehicle parking spaces complies with the maximum London Plan standard, and there is provision for 1 motorcycle parking space per 20 car parking spaces. Bike parking should meet or exceed the minimum London Plan standards and ideally be covered by CCTV to comply with London Cycle Design Standards. All development must include infrastructure for EV and ultra-low-emissions vehicles in conformity with London Plan Policy T6 (G). Proposals with higher rates of EV charging infrastructure (>50% of overall spaces) will be favoured. The provision of electric vehicle charging parking spaces and cycling parking spaces therefore contributes to the promotion of sustainable travel habits. Therefore, there is potential for a significant positive effect to be recorded.														
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	Yes																					
	Improve existing cycling and walking network and provide new routes?																						
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No																					
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?																						
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy provides indirect support for objective IIA7 as by switching to low/zero carbon modes of transportation, air pollution generated by transport in the Borough should be minimised. Therefore, there is potential for a minor positive effect to be recorded.														
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Direct	Medium	Medium/L ong	National	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA8 through support for low carbon, active modes of travel. The incorporation of these changes into the transport infrastructure should minimise the carbon emissions produced by transport in the Borough, as well as contribute to national aims to reduce carbon emissions. Therefore, there is potential for a minor positive effect to be recorded.														
	Support the shift towards usage of electric and ultralow emissions vehicles?	Yes																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	No																					
	Minimise greenhouse gas emissions?	Yes																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	Yes	Direct	Low	Medium/L ong	borough Wide	Permanent/Irreversible	Minor Positive	The policy supports the achievement of objective IIA9 by highlights that off-street parking should provide soft landscaping, permeable surfaces and appropriate boundary treatments to offset any														
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No																					

Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No									Increases to surface water run off, and subsequently flood risk. Therefore, there is potential for a minor positive effect to be recorded.		
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No											
	Conserve, enhance and repair natural and semi-natural habitats?	No											
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No											
	Achieve biodiversity net gain (BNG) in new developments?	No											
	Provide new or improved access to greenspaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Protect sites of geological importance?	No											
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage-led regeneration?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Help provide solutions to those assets on the Heritage at Risk register?	No											
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Medium	Medium (10yrs)	borough Wide	Permanent/Irreversible	Minor Positive		Parking developments should be designed appropriately as not to adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy, which should subsequently help to conserve the Borough's townscape character. The policy also states that services and activities within the public realm will be supported. Therefore, there is potential for a minor positive effect to be recorded.			
	Promote high quality and contextually successful design?	Yes											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Safeguard landscape and townscape features such as trees?	No											
	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	N/A	Neutral		The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.		
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

IIA6: The policy supports objective IIA6 as it highlights that developments in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. Car free developments should be prioritised in areas that are well connected to public transport (PTAL 4-6). Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be encouraged. Proposals that make on-site provision for parking will be supported where the number of vehicle parking spaces complies with the maximum London Plan standard, and there is provision for 1 motorcycle parking space per 20 car parking spaces. Bike parking should meet or exceed the minimum London Plan standards and ideally be covered by CCTV to comply with London Cycle Design Standards. All development must include infrastructure for EV and ultra-low-emissions vehicles in conformity with London Plan Policy T6 (G). Proposals with higher rates of EV charging infrastructure (>50% of overall spaces) will be favoured. The provision of electric vehicle charging parking spaces and cycling parking spaces therefore contributes to the promotion of sustainable travel habits. Therefore, there is potential for a significant positive effect to be recorded.

Potential Cumulative Effects Identified

Mitigation

Enhancements

IIA4: Enhancement: Consideration of any equality issues that may exist in relation to parking.

Policy/Alternative name	M3 Deliveries, Servicing and Construction
Chapter	Chapter 10: Transport and Movement
Policy/alternative description	The policy outlines that all development proposals should seek to minimise the adverse impacts of deliveries, freight and servicing by promoting efficiency and mitigating any effects.
Assumptions Made	None.

IIA framework			Assessment														
IIA objective	Assessment Questions	Assessment Question Screened in?	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance	Description of potential effects	Potential for cumulative effects?	Mitigation	Enhancement					
IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	Support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Support the provision of world class infrastructure and connectivity?	No															
	Support flexible working practices?	No															
	Protect and retain an adequate supply of employment floor space to address business needs?	No															
	Enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?	No															
	Safeguard existing town centres?	No															
	Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?	No															
	Improve existing shopping facilities within town centres and neighbourhood parades?	No															
	Support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?	No															
	Support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?	No															
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	Create new jobs in high value sectors, including in the green sector?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Encourage developers to demonstrate how they are investing in skills and employing local people?	No															
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Ensure all residents have equitable access to local services and facilities, taking into account the needs of an ageing population, including: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Increase the delivery of new or enhanced community and health facilities?	No															
	Help ensure all children have access to a local school within reasonable walking distance?	No															
	Increase education facility provision for children with learning disabilities?	No															
	Ensure local facilities have capacity to accommodate proposed development?	No															
	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?	No															
	Avoid an adverse/ discriminatory impact on protected characteristics/equality groups?	No															
	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?	No															
	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?	Yes	Direct	Medium	Medium/L ong	borough Wide	Permanent/Irreversible					Minor Positive	The policy supports the achievement of objective IIA4 by highlighting the importance of designing developments appropriately, to ensure adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups. Therefore, there is potential for a minor positive effect to be recorded.			
		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?	No														
Increase and improve opportunities for active travel including walking and cycling?		No															
Increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?		No															
Ensure everyone has access to open space to help promote healthy lifestyles and wellbeing		No															
Increase provision of private amenity space?		No															
Encourage the protection of allotments and encourage the delivery of new spaces to grow food?		No															
Ensure all representative groups will be consulted and engaged with?		No															
IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups	Increase the number of additional homes delivered to meet local needs/targets?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?	No															
	Provide affordable homes of the tenure and size to meet the identified needs?	No															
	Increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?	No															
	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?	No															
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	Provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?	No															
	Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?	No	Direct	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive	The policy provides support for the achievement of this objective as it supports opportunities to improve the efficiency of deliveries, services, and construction, which should facilitate a reduction in road congestion. For example, the policy highlights that developments should promote facilities such as parcel lockers or concierge services to enable efficient online retailing and reduce the number of missed deliveries. Similarly, construction deliveries should be arranged outside of peak hours, to limit congestion. All developments should submit a Construction Logistics Plan (for major applications only), to showcase that any negative impacts on the transport network generated in the construction phase of the development will be managed and mitigated. Development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan. Overall, a potential for a minor positive effect to be recorded.								
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	No															
	Improve existing cycling and walking network and provide new routes?	No															
	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No															
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	Yes															
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	Ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?	Yes	Indirect	Medium	Medium/L ong	borough Wide	Permanent/Reversible	Minor Positive					The policy provides indirect support for objective IIA7 as by reducing the number of freight, serving and delivery trips to developments during construction and operation, as well as switching to low/zero carbon modes of transportation, air pollution generated by transport in the Borough should be minimised. Therefore, there is potential for a minor positive effect to be recorded.				
	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No															
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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)?	No	Indirect	Medium	Medium/L ong	National	Permanent/Reversible	Minor Positive	The policy provides indirect support for the achievement of objective IIA8 through support for low emission modes of delivery and servicing, in line with TfL's latest guidance. The incorporation of low emission modes of delivery/services and construction into the transport infrastructure should minimise the carbon emissions produced by transport in the Borough, as well as contribute to national aims to reduce carbon emissions. Therefore, there is potential for a minor positive effect to be recorded.								
	Support the shift towards usage of electric and ultra low emissions vehicles?	No															
	Promote a low carbon local economy?	Yes															
	Ensure new developments are energy efficient?	No															
	Minimise greenhouse gas emissions?	Yes															
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?	No															
	Encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?	No															
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green	Avoid adverse effects on European designated habitats sites?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.								
	Conserve, enhance and repair nationally and locally designated wildlife sites?	No															
	Conserve, enhance and repair natural and semi-natural habitats?	No															
	Contribute to the delivery of new or safeguard existing BAP priority species and habitats?	No															
	Achieve biodiversity net gain (BNG) in new developments?	No															

and improve connectivity between, and access to, green spaces and functional habitats.	Provide new or improved access to green spaces?	No											
	Contribute to creating a network of new wildlife habitats, (considering all public, private and shared green spaces within the borough)?	No											
	Protect sites of geological importance?	No											
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Maintain and enhance access to cultural heritage assets?	No											
	Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?	No											
	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No											
	Improve the condition of the historic environment?	No											
	Encourage heritage led regeneration?	No											
	Help provide solutions to those assets on the Heritage at Risk register?	No											
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Promote high quality and contextually successful design?	No											
	Avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?	No											
	Protect sensitive areas and protected views?	No											
	Safeguard landscape and townscape features such as trees?	No											
IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Avoid development of greenfield land?	No											
	Promote the efficient use of minerals?	No											
	Protect soil quality and avoid soil pollution?	No											
	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No											
	Protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?	No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
IIA14 Waste: To minimise waste.	Encourage new developments to provide adequate space for waste separation?	No	N/A	N/A	N/A	N/A	N/A	Neutral	The policy neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.				
	Encourage the repurposing and refurbishing of buildings, instead of demolition?	No											
	Ensure waste is dealt with in line with circular economy principles?	No											
	Safeguard existing waste management sites?	No											

Significant Negative and Uncertain Effects

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

Enhancements