



LONDON BOROUGH OF  
**HARROW**

**London Borough of Harrow Council**  
**IIA Report**  
**Appendix E: Assessment of Alternative Local Plan Policies**

Prepared by:  
**SLR Consulting Ltd**

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Authors	Lauren Jones, Vicky Pearson, Izzy Teague
Project Director	Johanna Mitchell
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VERSION CONTROL RECORD				
Issue	Description of Status	Date	Reviewer Initials	Authors' Initials
1	Draft	10/10/2024	JM/VP	LJ, IT, VP
2	Final for consultation	28/10/2024	JM/VP	LJ, IT, VP

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
SS_ALT_1	++	+	+	+	++	++	0	0	0	+	+	++	+	+
SS_ALT_2	++	+	+	+	++	++	+	+	0	--	--	--	--	0
GR6_ALT_1	0	0	0	?	0	0	0	0	0	-	-	-	0	0
GR10_ALT_1	0	0	0	-	+	0	0	0	0	0	0	-	0	0
GR10_ALT_2	0	0	?	+	?	?	0	0	0	+	0	--	0	+
Strategic_Policy_03_Alt1	?	0	+	+	?	?	--	-	-	--	?	--	--	0
Strategic_Policy_03_Alt2	+	0	+	0	--	+	-	0	0	0	0	-	+	0
HO1_ALT_1	0	0	+	+	-	+	0	0	0	0	+	+	0	0
HO1_ALT_2	0	0	+	+	-	+	0	0	0	0	+	+	0	0
HO1_ALT_3	0	0	+	+	?	+	0	0	0	0	+	+	0	0
HO1_ALT_4	0	0	+	+	?	+	0	0	0	0	+	+	0	0
HO2_Alt 1	0	0	0	+	?	0	+	0	0	0	0	0	+	+
HO2_Alt 2	0	0	+	?	?	+	+	+	0	0	+	?	+	+
HO2_Alt 3	0	0	+	-	?	+	+	+	0	0	+	+	+	+
HO2_Alt 4	0	0	-	-	++	-	-	?	0	0	+	+	+	+
HO2_Alt 5	0	0	+	+	--	+	+	0	0	0	--	--	+	-
HO2_Alt 6	0	0	?	?	++	?	+	0	0	0	+	+	+	+
HO4_Alt 1	0	+	0	0	--	0	0	0	0	0	0	0	+	0
HO5_Alt 1	0	0	?	++	?	0	0	0	0	0	0	0	0	0
HO5_Alt 2	0	0	?	?	?	++	0	+	0	+	0	+	+	0
HO6_Alt 1	0	0	+	+	+	+	0	0	0	0	0	0	+	0
HO6_Alt 2	0	0	?	?	++	?	0	?	0	0	0	0	0	0
HO6_Alt 3	0	0	+	+	?	+	0	+	0	0	0	0	0	0
HO7_Alt 1	0	0	+	+	+	+	0	0	0	0	0	0	+	0
HO8_Alt 1	0	0	-	-	+	-	0	0	0	0	0	0	0	0
HO8_Alt 2	+	0	+	-	+	+	-	0	0	0	0	0	0	0
HO9_ALT_1	-	-	0	-	-	?	0	0	0	0	0	-	0	-
HO9_ALT_2	+	+	+	+	-	+	0	0	0	0	0	+	0	+
HO9_ALT_3	+	+	+	+	?	+	0	0	0	0	0	-	0	+
HO9_ALT_4	+	+	?	+	?	+	0	0	0	0	0	-	0	+
HO10_ALT_1	0	0	+	0	-	+	0	+	0	0	0	?	0	-
HO10_ALT_2	0	0	+	+	--	+	0	0	+	+	0	-	0	+
HO10_ALT_3	0	0	+	+	-	+	0	0	+	+	0	-	0	+
HO10_ALT_4	0	0	-	+	-	+	0	0	+	+	0	-	0	+
HO12_ALT_1	0	0	?	--	-	?	0	0	+	?	0	-	0	0
HO12_ALT_2	0	0	--	--	--	+	0	0	+	+	0	+	+	+
LE1_ALT_1	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE3_ALT_1	+	+	0	0	0	+	0	+	0	0	0	0	0	+
LE3_ALT_2	?	+	0	0	+	+	0	+	0	0	0	0	0	+
GI2_ALT_1	0	0	0	+	0	0	0	0	+	+	0	0	0	0
GI3_ALT_1	0	0	0	+	0	0	0	0	+	++	+	0	+	0
CN1_ALT_1	+	+	0	+	+	0	0	--	+	+	+	+	0	0
CN1_ALT_2	+	+	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 alternative is to retain the existing spatial strategy.
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?	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 employment and industrial land to appropriate locations, to meet current and future needs. Town centres will be improved to increase retail expenditure and secure the vitality and viability of the town centre network (e.g.: Wealdstone, Stanmore, 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. Employment land (including for retail, leisure and hotel development) throughout the Borough will have been managed to preserve a supply most suited to existing and foreseeable needs. 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?	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/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, to create 4000 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 3000 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																					
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	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, and local improvements should benefit everyone in the community. 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																					
	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	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' play space, as well as access to natural green space for residents and visitors is also considered. The strategy also considers the provision of private amenity space as it highlights that gardens should be protected from inappropriate development. 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?		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	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 6,050 (net) homes during the Plan period. The housing needs of the Borough's residents will have been met through provision of a range of housing types and tenures including provision of family sized affordable housing and supported housing for the elderly and vulnerable people. Within the Harrow and Wealdstone Opportunity Area, a minimum of 2,800 additional homes are to be delivered. The Borough's residential 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?	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	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. 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. 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?	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 geodiversity and improve connectivity between, and access to, green	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 (including gardens) to be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will also be enhanced (e.g.: through the Wood	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?	No																					
	Provide new or improved access to greenspaces?	Yes																					



Policy/Alternative name	Spatial Strategy
Chapter	Chapter 01: Spatial Vision and Objectives
Policy/alternative description	The alternative is to seek to go beyond the level of development identified in the proposed strategy and provide more employment, retail and cultural / leisure floorspace.
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	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. The alternative aims to deliver higher than this identified level of development however. Town centres will be safeguarded and improved to increase retail expenditure and secure the vitality and viability of the town centre network (eg: 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.														
	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.														
	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.														
	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.			
		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 (2019/20 – 2040/41), 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, a minimum of 5000 additional homes are to be delivered. The alternative aims to deliver higher than this identified level of development, in order to contribute further to closing the gap between minimum London Plan housing targets for the borough and the actual objectively assessed need. 'Metroland' areas will be safeguarded for family housing. Therefore, a potential significant 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?	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.			
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.														
	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.														
	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	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																					



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	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Significant Negative	As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact habitats and species existing within these spaces, as well as access to these spaces. Therefore, a potential significant negative effect is identified.		Mitigation: ensure that protection of Green Belt, Metropolitan Open Land and other open space is provided, no matter the level of development carried out in order to minimise impact.	
	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?	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										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No										
	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Significant Negative	As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact the conservation and enhancement of Harrow's identified heritage assets and historical environment. It may also lead to development in areas of special character and architectural significance. Therefore, a potential significant negative effect is identified.		Mitigation: ensure that protection of heritage assets and the historical environment is provided, no matter the level of development carried out in order to minimise impact.	
	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										
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	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Significant Negative	As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This may lead to development in areas that is not relevant to surrounding landscape and townscape character, role, and function. Therefore, a potential significant negative effect is identified.		Mitigation: ensure that protection of Green Belt, Metropolitan Open Land and other open space is provided, no matter the level of development carried out, and that impact on landscape/townscape is always considered in order to minimise impact.	
	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?	Yes	Direct	Low	Long (20+ yrs)	Borough Wide	Permanent/Irreversible	Significant Negative	As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This may lead to development on greenfield land or Green Belt. Therefore, as development on greenfield land would remove protection of natural resources in the Borough, a potential significant negative effect is identified.		Mitigation: ensure that protection of natural resources, including greenfield land, is provided, no matter the level of development carried out in order to minimise impact.	
	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	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**

IIA10: As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact habitats and species existing within these spaces, as well as access to these spaces. Therefore, a potential significant negative effect is identified.  
 IIA11: As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact the conservation and enhancement of Harrow's identified heritage assets and historical environment. It may also lead to development in areas of special character and architectural significance. Therefore, a potential significant negative effect is identified.  
 IIA12: As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This may lead to development in areas that is not relevant to surrounding landscape and townscape character, role, and function. Therefore, a potential significant negative effect is identified.  
 IIA13: As the alternative aims to deliver higher than the minimum of 16,040 (net) homes identified for development, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This may lead to development on greenfield land or Green Belt. Therefore, as development on greenfield land would remove protection of natural resources in the Borough, a potential significant negative effect is identified.

**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. The alternative aims to deliver higher than this identified level of development however. Town centres will be safeguarded and improved to increase retail expenditure and secure the vitality and viability of the town centre network (eg: 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 (2019/20 – 2040/41), 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, a minimum of 5000 additional homes are to be delivered. The alternative aims to deliver higher than this identified level of development, in order to contribute further

**Potential Cumulative Effects Identified**

**Mitigation**

IIA10: Mitigation: ensure that protection of Green Belt, Metropolitan Open Land and other open space is provided, no matter the level of development carried out in order to minimise impact.  
 IIA11: Mitigation: ensure that protection of heritage assets and the historical environment is provided, no matter the level of development carried out in order to minimise impact.  
 IIA12: Mitigation: ensure that protection of Green Belt, Metropolitan Open Land and other open space is provided, no matter the level of development carried out, and that impact on landscape/townscape is always considered in order to minimise impact.  
 IIA13: Mitigation: ensure that protection of natural resources, including greenfield land, is provided, no matter the level of development carried out in order to minimise impact.

**Enhancements**

Policy/Alternative name	GR6 Areas of Special Character: Alternative 1
Chapter	Chapter Q2: High Quality Growth
Policy/alternative description	This alternative is for no policy option to be implemented.
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	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 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?	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.								
	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					Uncertain	It is unclear whether the alternative supports the achievement of objective IIA4 as a lack of policy removes the ability of the council to set expectations for development and the protection of Special Character Areas. As a result, a lack of control through planning policy may lead to degradation of areas of special character, including those which are areas of open space. It is uncertain whether this could lead to reduced access to currently identified areas of special character, which could affect healthy lifestyles. Therefore, an uncertain effect is identified.	Mitigation: Ensure policies that address access to open space (e.g.: Policy G12 Open Space) specifically address access to open space in Special Character Areas.		
		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 alternative 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 alternative 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 alternative 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 alternative 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 alternative 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	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Negative	The alternative does not support the achievement of objective IIA10 as a lack of policy removes the ability of the council to set expectations for development and the protection of Special Character Areas. As a result, opportunities to increase the appreciation of, or public access to, areas of special character are unlikely to be managed effectively. As these areas provide substantial tree cover and open/natural land, a lack of management from policy is likely to cause degradation of areas of special character, through harm to biodiversity. Local plan policy G13 Biodiversity would control development in terms of protecting and enhancing biodiversity through a biodiversity net gain of 20%. However, without a special character area policy, a potential minor negative effect is identified because it may not necessarily protect the specific biodiversity within the special character areas, that contribute to their designation.	Mitigation: Ensure policies that address biodiversity (e.g.: Policy G13 Biodiversity) specifically address access to/enhancement of biodiversity in Special Character Areas.							
	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																
IIA11 Historic Environment: To conserve and enhance the historic environment,	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Negative	The alternative does not support the achievement of objective IIA11 as a lack of policy removes the ability of the council to set expectations for development and the protection of Special Character Areas. A lack of management from policy is likely to cause degradation of areas of special character, through development that harms	Mitigation: Ensure policies that address heritage assets (e.g.: Policy HE1 Heritage Assets) specifically address heritage assets in Special Character Areas.							
	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															

heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Contribute to the better management of heritage assets and contribute to conserving heritage at risk?	No								heritage assets. Local plan policy HE1 Heritage Assets would protect and enhance heritage assets across the Borough. However, without a special character area policy, a potential minor negative effect is identified as existing policies may not necessarily protect the specific heritage assets within special character areas, that contribute to their designation.		
	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/L ong	Borough Wide	Permanent/Reversible	Minor Negative	The alternative does not support the achievement of objective IIA12 as a lack of policy removes the ability of the council to set expectations for development and the protection of Special Character Areas. A lack of management from policy is likely to cause degradation of areas of special character, through development that substantially harms an area of special character or its setting. This includes those that would have an impact on the protected views to and from areas of special character. Local plan policy GRS View Management would control development in terms of protecting and enhancing views across the Borough. However, without a special character area policy, a potential minor negative effect is identified as existing policies may not necessarily protect the specific landscape/townscape attributes within special character areas, that contribute to their designation.	Mitigation: Ensure policies that address protected views and character (e.g.: Policy GRS View Management) specifically address landscape/townscape attributes in Special Character Areas.		
	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										
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 alternative 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 alternative 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

IIA4: It is unclear whether the alternative supports the achievement of objective IIA4 as a lack of policy removes the ability of the council to set expectations for development and the protection of Special Character Areas. As a result, a lack of control through planning policy may lead to degradation of areas of special character, including those which are areas of open space. It is uncertain whether this could lead to reduced access to currently identified areas of special character, which could affect healthy lifestyles. Therefore, an uncertain effect is identified.

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

- IIA4: Mitigation: Ensure policies that address access to open space (e.g.: Policy G12 Open Space) specifically address access to open space in Special Character Areas.
- IIA10: Mitigation: Ensure policies that address biodiversity (e.g.: Policy G13 Biodiversity) specifically address access to/enhancement of biodiversity in Special Character Areas.
- IIA11: Mitigation: Ensure policies that address heritage assets (e.g.: Policy HE1 Heritage Assets) specifically address heritage assets in Special Character Areas.
- IIA12: Mitigation: Ensure policies that address protected views and character (e.g.: Policy GRS View Management) specifically address landscape/townscape attributes in Special Character Areas.

Enhancements

Policy/Alternative name	GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 1
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	This alternative is for no policy option to be implemented.
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 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 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										
IIA2 Employment: 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 alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.			
	Create new jobs in high value sectors, including in the green sector?	No										
IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	Encourage developers to demonstrate how they are investing in skills and employing local people?	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.			
	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										
	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/Long	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA4 as a lack of policy means that the provision of sufficient private garden/amenity space for proposal sites and any donor property is not guaranteed for developments. Therefore, a potential minor negative 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	Low	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative (not policy) may result in more development of infill, backland sites, [non-designated] open space, garden land and garage sites for housing which would support this IIA objective, although delivery may not be in line with the Strategic Housing Policy 03 in terms of location and sizes. 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?	Yes										
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?	Yes										
	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 alternative 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 alternative 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 alternative 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? 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 alternative 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	Development of infill, backlands sites etc could have a potentially negative effect on biodiversity through loss of habitats however, policy GI3 Biodiversity provides mitigation through requiring biodiversity net gain from all development proposals. 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 and where	Protect sites of geological importance?	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.			
	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										

appropriate improve the quality of the built environment	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	Low	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA12 as a lack of policy relating to proposals for infill, backland sites, [non-designated] open space, garden land and garage sites means that they might not be of high-quality design, and thus may be developed at an inappropriate scale and intensity. Therefore, a potential minor negative 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 alternative 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 alternative 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	GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 2
Chapter	Chapter 02: High Quality Growth
Policy/alternative description	This alternative is for a more permissive policy option to be implemented.
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. It is assumed that the alternative would be a more permission version of the preferred policy.

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.							
	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: o education facilities? o recreation facilities? o health services?	No	N/A	N/A	N/A	N/A	N/A	Uncertain	Proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will be supported where the development is accessible to all. The policy will also support the provision of housing in the Borough. However, a more permissive policy may lead to development in areas where delivery of housing is not preferred (e.g.: the suburban area) and therefore may lead to an over development of homes in certain areas. This may lead to issues with access to local community facilities (education, health), as supporting infrastructure has not been provisioned for. Therefore, an uncertain effect is recorded.		Mitigation: the policy needs to incorporate a consideration of accessibility into the more permissive policy.					
	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	Direct	Low	Medium/Long	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.			
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	Proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will assist in the delivery of homes across the Borough [Strategic Housing Policy 03]. However, a more permissive policy may lead to development in areas where delivery of housing is not preferred (e.g.: the suburban area) and therefore may lead to an over development of homes in certain areas. Therefore, an uncertain effect is recorded.		Mitigation: the policy needs to incorporate a consideration of local housing need into the more permissive policy.					
	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?	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	N/A	N/A	N/A	N/A	N/A	Uncertain	The alternative highlights that 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. However, a more permissive policy may lead to development in areas where active methods of travel, including public transport, are less accessible. Therefore, an uncertain effect is recorded.		Mitigation: the policy needs to incorporate a consideration of accessibility and sustainable transport into the more permissive policy.					
	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?	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.							
	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 alternative 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 alternative 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	N/A	N/A	N/A	N/A	Neutral					The alternative neither supports nor detracts from the achievement			

IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Maintain and enhance access to cultural heritage assets?	No								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										
	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/L ong	Borough Wide	Permanent/Irreversible	Significant Negative	It is assumed that in this alternative, 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. However, a more permissive policy may mean that there are more proposals, they could be less appropriately located, and subsequently may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to. Therefore, a potential significant negative effect is recorded.	Mitigation: a more restrictive policy to ensure that development is focused in areas that does not impact on the character of the area.		
	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										
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 alternative 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?	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 servicing and storage can be provided. 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**

IIA3: Proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will be supported where the development is accessible to all. The policy will also support the provision of housing in the Borough. However, a more permissive policy may lead to development in areas where delivery of housing is not preferred (e.g.: the suburban area) and therefore may lead to an over development of homes in certain areas. This may lead to issues with access to local community facilities (education, health), as supporting infrastructure has not been provisioned for. Therefore, an uncertain effect is recorded.

IIA5: Proposals for infill, backland sites, [non-designated] open space, garden land and garage sites will assist in the delivery of homes across the Borough [Strategic Housing Policy 03]. However, a more permissive policy may lead to development in areas where delivery of housing is not preferred (e.g.: the suburban area) and therefore may lead to an over development of homes in certain areas. Therefore, an uncertain effect is recorded.

IIA6: The alternative highlights that 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. However, a more permissive policy may lead to development in areas where active methods of travel, including public transport, are less accessible. Therefore, an uncertain effect is recorded.

IIA12: It is assumed that in this alternative, 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. However, a more permissive policy may mean that there are more proposals, they could be less appropriately located, and subsequently may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: Mitigation: the policy needs to incorporate a consideration of accessibility into the more permissive policy.  
 IIA5: Mitigation: the policy needs to incorporate a consideration of local housing need into the more permissive policy.  
 IIA6: Mitigation: the policy needs to incorporate a consideration of accessibility and sustainable transport into the more permissive policy.  
 IIA12: Mitigation: a more restrictive policy to ensure that development is focused in areas that does not impact on the character of the area.

**Enhancements**

Policy/Alternative name	Strategic Policy 03 - Alternative 1: High Housing Growth
Chapter	Chapter 04: Housing
Policy/alternative description	This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2020-41.
Assumptions Made	Assumed that the sub-sections of Strategic Policy 03 would apply to this policy, for example, the need for gypsy and traveller provision.

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	Uncertain	It is unclear how residential development will be met at a higher quantum of 24,266 dwellings. A higher housing requirement may increase the pressure to redevelop some of the existing employment uses, town centre uses or mixed-use areas/uses for delivering additional housing, hence an uncertain 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?	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 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: education facilities? recreation facilities? health services? Increase the delivery of new or enhanced community and health facilities?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This alternative prioritises development in locations which are accessible, with good access to town centres and public transport links, as well as allowing 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.	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?	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										
	Increase and improve opportunities for active travel including walking and cycling?	Yes										
IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	Increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities?	No	Yes	Low	Medium	Localised	Permanent/Reversible	Minor Positive	The alternative 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 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										
	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?	Yes										
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?	Yes	N/A	N/A	N/A	N/A	N/A	Uncertain	There is potential for a positive effect IIA5 for this alternative, as it aims to deliver 24,266 homes across Harrow. A higher housing requirement could increase opportunities to deliver additional family sized housing, affordable housing (including low cost rented housing and/or housing to meet the needs of an ageing population and those with specialist needs. This is above the need identified within the Borough, so could also help to meet unmet need within the region. However, there is some uncertainty regarding if this higher quantum would be deliverable, particularly on previously developed sites within the existing built-up area of the Borough.	No	Further investigations into the sites available for development would need to be undertaken to confirm if the 24,266 dwelling target is deliverable.	
	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										
	Encourage intensification in existing residential areas in the most accessible locations within the borough?	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	N/A	N/A	N/A	N/A	N/A	Uncertain	This alternative prioritises development in locations which are accessible such as the Harrow and Wealdstone Opportunity area (which includes the Harrow Metropolitan and Wealdstone District Centres), as well as prioritising residential development in areas with good existing transport links and services (eg: within 800m of town centres and tube/rail stations, as well as within locations with a PTAL 3-6). However, there is some uncertainty in relation to whether a higher housing requirement can be accommodated within the existing urban area and whether this may result in some development in less accessible locations to local facilities, services, jobs or if more dispersed patterns of development may be required. This may have some impact on use of sustainable modes of transport hence an uncertain effect has been 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?	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	High	Medium/Long	Borough Wide	Permanent/Irreversible	Significant Negative	A higher quantum of development (24,266 dwellings) over the plan period could contribute to air, noise and light pollution, particularly in areas where there are currently lower levels of pollution such as light pollution around Weald Woods. It is likely that a higher quantum will lead to greater pollution levels, although it is noted that this will be dependent on the location and design of developments. Therefore, a potential significant negative effect has been identified.	Yes	Further investigations into the sites available for development and design measures taken at each site to minimise air, noise and light pollution will need to be undertaken.	
	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	N/A	Medium	Long (20+yrs)	Regional	Permanent/Reversible	Minor Negative	An increased quantum of development could lead to increased absolute emissions across the Borough, both during construction and operational phases. Therefore a potential minor negative effect has been identified.	Yes		
	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?	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	Medium	Long (20+yrs)	Regional	Permanent/Reversible	Minor Negative	It is noted within this alternative that a greater area of land would be required to meet the higher quantum of development, and this could therefore increase pressure to develop Green Belt and Metropolitan Open Land. These designations often provide natural flooding buffers, which may be removed/developed, putting future homes at risk.	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?	Yes	Direct	High	Long (20+yrs)	Borough Wide	Permanent/Reversible	Significant Negative	The higher quantum of growth within this alternative (24,266 dwellings) will require more land for development. It is noted within the alternative that this could therefore increase pressure to develop Green Belt and Metropolitan Open Land, if sites cannot be accommodated within existing urban areas. The development of these designations would lead to a permanent and irreversible loss of habitats and the biodiversity they support.	Yes	The loss of Green Belt and Metropolitan Open Land would be irreversible and therefore unmitigable.	
	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)?	Yes										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Protect sites of geological importance?	Yes										
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Uncertain	It is unclear how a higher quantum of development (24,266 dwellings) over the plan period could affect the historic environment. A higher density of development could erode the historic setting, with a greater number of taller buildings and fewer settlement gaps. This could be mitigated by policies such as GR4 (Building Heights). However, the exact location, design and scale of development is unknown, hence an uncertain effect has been recorded.	No	Further investigations into the sites available for development would need to be undertaken.	
	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	Long (20+yrs)	Borough Wide	Permanent/Reversible	Significant Negative	This policy encourages the development of previously developed land in accessible locations, such as the Harrow and Wealdstone Opportunity area. However, the higher quantum of growth within this alternative (24,266 dwellings) will require more land for development. It is noted within the alternative that this could therefore increase pressure to develop Green Belt and Metropolitan Open Land, thus giving the potential to alter the townscape and landscape features of the Borough.	Yes	The addition of a criterion which notes that within the Harrow and Wealdstone Opportunity area, development will need to consider the potential effects on MOL both through direct development and surrounding development could help to mitigate the negative effect identified.	
	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/Long	Borough Wide	Permanent/Reversible	Significant Negative	Whilst the higher quantum of development in this alternative could lead to a greater volume of previously developed land being redeveloped, there is a risk that greenfield land will be needed in order to reach the housing target of 24,266 dwellings. The development of such land would lead to a permanent and irreversible loss, hence a potential significant negative effect has been recorded.	No	The loss of greenfield land would be permanent and irreversible.	
	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										
	Encourage new developments to provide adequate space for waste separation?	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 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**

IIA1: It is unclear how residential development will be met at a higher quantum of 24,266 dwellings. A higher housing requirement may increase the pressure to redevelop some of the existing employment uses, town centre uses or mixed-use areas/uses for delivering additional housing, hence an uncertain effect has been recorded.

IIA5: There is potential for a positive effect IIA5 for this alternative, as it aims to deliver 24,266 homes across Harrow. A higher housing requirement could increase opportunities to deliver additional family sized housing, affordable housing (including low cost rented housing and/or housing to meet the needs of an ageing population and those with specialist needs. This is above the need identified within the Borough, so could also help to meet unmet need within the region. However, there is some uncertainty regarding if this higher quantum would be deliverable, particularly on previously developed sites within the existing built-up area of the Borough.

IIA6: This alternative prioritises development in locations which are accessible such as the Harrow and Wealdstone Opportunity area (which includes the Harrow Metropolitan and Wealdstone District Centres), as well as prioritising residential development in areas with good existing transport links and services (eg: within 800m of town centres and tube/rail stations, as well as within locations with a PTAL 3-6). However, there is some uncertainty in relation to whether a higher housing requirement can be accommodated within the existing urban area and whether this may result in some development in less accessible locations to local facilities, services, jobs or if more dispersed patterns of development may be required. This may have some impact on use of sustainable modes of transport hence an uncertain effect has been recorded.

IIA7: A higher quantum of development (24,266 dwellings) over the plan period could contribute to air, noise and light pollution, particularly in areas where there are currently lower levels of pollution such as light pollution around Weald Woods. It is likely that a higher quantum will lead to greater pollution levels, although it is noted that this will be dependent on the location and design of developments. Therefore, a potential significant negative effect has been identified.

IIA10: The higher quantum of growth within this alternative (24,266 dwellings) will require more land for development. It is noted within the alternative that this could therefore increase pressure to develop Green Belt and Metropolitan Open Land, if sites cannot be accommodated within existing urban areas. The development of these designations would lead to a permanent and irreversible loss of habitats and the biodiversity they support.

IIA11: It is unclear how a higher quantum of development (24,266 dwellings) over the plan period could affect the historic environment. A higher density of development could erode the historic setting, with a greater number of taller buildings and fewer settlement gaps. This could be mitigated by policies such as GR4 (Building Heights). However, the exact location, design and scale of development is unknown, hence an uncertain effect has been recorded.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

IIA3 and IIA6: This alternative encourages development to be focused into areas which have existing good access to local services and facilities. This alternative could work in combination with Chapter 10 of this Plan (specifically policy MT1) 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.

IIA7: The development of up to 24,266 new homes across the Borough has potential to significantly increase light, noise and air pollution, particularly in areas where there are currently lower levels of pollution such as light pollution around Weald Woods.

IIA8: This alternative would deliver a greater density of homes, which could assist in the delivery of district heating networks. This could work in combination with Local Plan Policy CN2 and the London Plan to ensure low carbon heating is deliverable to future residents.

IIA12: This policy encourages additional housing development throughout the Borough. There is therefore potential for cumulative effects on landscape and townscape from the combined effects of developing 24,266 additional homes in the Borough, particularly in areas which are currently less densely populated.

**Mitigation**

IIA5: Further investigations into the sites available for development would need to be undertaken to confirm if the 24,266 dwelling target is deliverable.

IIA7: Further investigations into the sites available for development and design measures taken at each site to minimise air, noise and light pollution will need to be undertaken.

IIA10: The loss of Green Belt and Metropolitan Open Land would be irreversible and therefore unmitigable.

IIA11: Further investigations into the sites available for development would need to be undertaken.

IIA12: The addition of a criterion which notes that within the Harrow and Wealdstone Opportunity area, development will need to consider the potential effects on MOL both through direct development and surrounding development could help to mitigate the negative effect identified.

IIA13: The loss of greenfield land would be permanent and irreversible.

**Enhancements**

Policy/Alternative name	Strategic Policy 03 - Alternative 2: Low Housing Growth
Chapter	Chapter 04: Housing
Policy/alternative description	This would be based on the London Plan ten-year housing deliver target of 8020 homes (2019-29) and the need beyond this period would be based on the 2017 London SHLAA. This would comprise of the indicative capacity of large sites of 921 homes (phases 4: 2029-34) and 138 homes (phases 5:2034 -41), plus the London Plan small sites allowance of 3750 homes (10 years), all of which would total 4809 homes. Therefore, this approach results in a total housing requirement of 12,829 homes over a 20-year period (2021 -41).
Assumptions Made	Assumed that the sub-sections of strategic Policy 03 would apply to this policy, for example, the need for gypsy and traveller provision. It has been assumed that development quantum for areas of the Borough resulting from this alternative would mirror the proportions set out in the preferred policy i.e. 46% homes in Harrow and Wealdstone Opportunity Area - 15.5% in the rest of the Borough and 25% of homes on small sites.

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, which could help to support town centres.	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 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: education facilities? recreation facilities? health services?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This policy prioritises development in locations which are accessible, with good access to town centres and public transport links, as well as allowing 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.	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	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			
	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	Medium	Long (20+yrs)	Localised	Permanent/Reversible	Significant Negative	There is potential for a positive effect IIA5 for this alternative, as it aims to deliver 12,829 homes across Harrow. However, it is noted that this is unlikely to meet the identified housing need for the Borough over the plan period including the need for affordable and family sized homes, hence a potential significant negative 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	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	This alternative prioritises development in locations which are accessible, as well as prioritising residential development in areas with good existing transport links and services. 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 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	Localised	Permanent/Reversible	Minor negative	The development of 12,829 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.	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 alternative 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 alternative 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 alternative 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 and where appropriate improve the quality of the built 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 alternative 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	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										
	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	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	Neutral	The alternative 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**

IIA5: There is potential for a positive effect IIA5 for this alternative, as it aims to deliver 12,829 homes across Harrow. However, it is noted that this is unlikely to meet the identified housing need for the Borough over the plan period including the need for affordable and family sized homes, hence a potential significant negative effect has been recorded.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

IIA3 and IIA6: This alternative encourages development to be focused into areas which have existing good access to local services and facilities. This alternative could work in combination with Chapter 10 of this Plan (specifically policy MT1) 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.

IIA7: The development of up to 16,000 new homes across the Borough has potential to significantly increase light, noise and air pollution, particularly in areas where there are currently lower levels of pollution such as light pollution around Weald Woods.

IIA12: This policy encourages additional housing development throughout the Borough. There is therefore potential for cumulative effects on landscape and townscape from the combined effects of developing ~16,000 additional homes in the Borough, particularly in areas which are currently less densely populated.

**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: Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 1: Continue with existing policy DM24 Housing mix
Assumptions Made	It has been assumed that criteria B (Flatted developments), C (Housing schemes solely comprising of smaller units) and D (Monitoring) would also be included within the alternatives, as these do not directly relate to the mix of dwellings element described in the alternatives.

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?		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 (and therefore increasing quality of life and wellbeing), hence 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?	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											
	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/Reversible	Minor negative	Alternative 1 constitutes extant Policy DM24: Housing Mix, is a highly permissive policy in relation to the size mix of housing schemes and promoting mixed and inclusive communities. It sets out a size mix for affordable housing and seeks to increase the delivery of affordable housing (including family sized housing, based on consideration of factors such as site location, character of surroundings and the need to optimise housing output on previously developed land site. Whilst this could help to ensure that there is flexibility to meet changing needs within the Borough, monitoring data indicates that the existing policy is resulting in the delivery of smaller sized dwellings (i.e. 1 or 2 bed and studio units), even though there is a significant need for family sized dwellings (i.e. three bed or more). Therefore a minor negative effect has been identified for IIA5.	No		No mitigation is proposed, as the final mix of development would be dependant on detailed site plans.
	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 and where appropriate improve the quality of the built environment	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?	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 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										
		No										

Significant Negative and Uncertain Effects

Significant Positive Effects

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

IIA5: No mitigation is proposed, as the final mix of development would be dependant on detailed site plans.

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	HO1 Dwelling Size Mix: Alternative 2
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 2: Do not include a target that seeks to ensure 25 of housing delivered on a scheme are family sized dwellings
Assumptions Made	It has been assumed that criteria B (Flatted developments), C (Housing schemes solely comprising of smaller units) and D (Monitoring) would also be included within the alternatives, as these do not directly relate to the mix of dwellings element described in the alternatives.

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										
IIA2 Employment: 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										
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?		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 (and therefore increasing quality of life and wellbeing), hence 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?											
	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											
	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/Reversible	Minor negative	This alternative would still help to achieve the additional residential dwellings needed within the Borough and could help to increase the density of development, however, the size of these dwellings may not meet the identified need for family homes (i.e. 3 beds or more) within Harrow. Therefore, a minor negative effect has been recorded in relation to IIA5.	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?	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	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										

and access to, green spaces 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 and where appropriate improve the quality of the built environment	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										
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)	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		
	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										
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	N/A	N/A	N/A	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										
	Safeguard existing waste management sites?	No										

Significant Negative and Uncertain Effects

Significant Positive Effects

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	HO1 Dwelling Size Mix: Alternative 3
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 3: Include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing
Assumptions Made	It has been assumed that criteria B (Flatted developments), C (Housing schemes solely comprising of smaller units) and D (Monitoring) would also be included within the alternatives, as these do not directly relate to the mix of dwellings element described in the alternatives.

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 (and therefore increasing quality of life and wellbeing), hence 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?											
	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											
	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	Uncertain	Alternative 3 could help to ensure the identified shortfall of family sized homes (3+beds) is addressed swiftly across the Borough, throughout the plan period. However, this potential option may have some impact on quantity of housing delivered (such as at small sites), as it may reduce the flexibility in the approach for determining an appropriate size mix for housing schemes, based on consideration of factors such as a site location, type of sites and the need to optimise housing output. This could reduce the overall number of homes which can be delivered in the Borough. Due to this uncertainty, an overall uncertain effect has been recorded.	No		The creation of a stepped approach to family housing requirements linked to the size of the development within the alternative (or Policy HO1) could help to ensure that small sites remain viable, whilst still working to meet the identified need for family homes.
	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										
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	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										



<p>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?	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>IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment</p>	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										
<p>IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character</p>	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?		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										
<p>IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</p>	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	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										
<p>IIA14 Waste: To minimise waste.</p>	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	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**

IIA5: Alternative 3 could help to ensure the identified shortfall of family sized homes (3+beds) is addressed swiftly across the Borough, throughout the plan period. However, this potential option may have some impact on quantity of housing delivered (such as at small sites), as it may reduce the flexibility in the approach for determining an appropriate size mix for housing schemes, based on consideration of factors such as a site location, type of sites and the need to optimise housing output. This could reduce the overall number of homes which can be delivered in the Borough. Due to this uncertainty, an overall uncertain effect has been recorded.

**Significant Positive Effects**

**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.  
 IIA5: The creation of a stepped approach to family housing requirements linked to the size of the development within the alternative (or Policy HO1) could help to ensure that small sites remain viable, whilst still working to meet the identified need for family homes.

Policy/Alternative name	HO1 Dwelling Size Mix: Alternative 4
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 4: Do not apply 25% family housing target to minor development
Assumptions Made	It has been assumed that criteria B (Flatted developments), C (Housing schemes solely comprising of smaller units) and D (Monitoring) would also be included within the alternatives, as these do not directly relate to the mix of dwellings element described in the alternatives.

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

To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	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 and where appropriate improve the quality of the built environment	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										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	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?		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										
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?	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	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										
IIA14 Waste: To minimise waste.	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	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**

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

**Significant Positive Effects**

**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 - Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).
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
<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 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											
<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 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										
<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?		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		
	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?											
	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?											
<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	Medium/Long	Localised	Permanent/Reversible	Minor Positive	This policy requires conversions to ensure all homes are designed with privacy, daylight and exposure to external noise considered. These factors could contribute to ensuring the health and wellbeing of residents is maintained. Therefore, an overall minor positive effect has been recorded,	No		It is suggested Policy DM26 is reworded 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.
	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										
<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	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 1 (Existing Policy DM26) allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there are no size requirements or criteria to ensure at least on family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.	No	The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.	
	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											
<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 alternative 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?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Alternative 1 contains a specific criterion which requires conversion developments to ensure there is adequate light, with limited noise exposure, through the implementation of existing Policy DM26.	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	Criterion 3j of the preferred 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 neutral effect is identified.	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										
	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 alternative 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 alternative 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 and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No							The alternative 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	N/A	N/A	N/A	N/A	N/A	Neutral				
	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										
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 alternative 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?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral				
	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							Alternative 1 (Existing Policy DM26) 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		
	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				
	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?											
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?								Alternative 1 (Existing Policy DM26) requires conversions to retain space for waste bins, and also allows for the redevelopment of existing buildings into multiple homes rather than demolition.	No		
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?											
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive				
	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**

IIA5: Alternative 1 (Existing Policy DM26) allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there are no size requirements or criteria to ensure at least on family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA5: The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.

**Enhancements**

IIA4: It is suggested Policy DM26 is reworded 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.

Policy/Alternative name	HO2: Conversion and redevelopment of larger dwellings - Alternative 2
Chapter	Chapter 04: Housing
Policy/alternative description	Policy should not include a minimum 130m2 size threshold for the conversion/redevelopment of homes into flats.
Assumptions Made	It has been assumed that this alternative would include proposed wording of Policy HO2, bar criterion 1a.

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: education facilities? recreation facilities? health services? increase the delivery of new or enhanced community and health facilities?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This alternative 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 alternative 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		
	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?											
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	This alternative 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. However, there are no minimum size thresholds for this alternative, which could lead to the creation of small, cramped dwellings. Further details of developments are needed to determine the nature of effects for IIA4, hence an uncertain effect has been recorded.	No	The precise nature of potential effects for IIA4 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.	
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 2 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there are no size requirements or criteria to ensure at least on family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.	No	The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.	
	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 alternative 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	Alternative 2 contains a specific criterion 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 alternative 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). Criterion 2) of the preferred Policy HO2 includes a	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										

Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Minimise greenhouse gas emissions?	Yes									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 alternative 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 alternative 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 and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No												
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Indirect	Low	Medium/Long	Localised	Permanent/Reversible	Minor Positive	An indirect minor positive effect has been identified for IIA11, as Alternative 2 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												
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	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	N/A	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 2 allows for the redevelopment of larger dwellings into two or more smaller homes without the need to retain a family sized home. This could increase the number of conversions undertaken. The precise nature of the potential effect on the townscape is unknown, as the locations and design of conversions is not yet known. Therefore an uncertain effect has been recorded.	No		Further details of the developments likely to come forwards under this policy (such as design and location) are required in order to determine the precise nature of potential effects.	
	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?	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	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Alternative 2 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?													
IIA14 Waste: To minimise waste.	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?													
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Alternative 2 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**

IIA4: This alternative 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. However, there are no minimum size thresholds for this alternative, which could lead to the creation of small, cramped dwellings. Further details of developments are needed to determine the nature of effects for IIA4, hence an uncertain effect has been recorded.

IIA5: Alternative 2 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there are no size requirements or criteria to ensure at least one family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.

IIA12: Alternative 2 allows for the redevelopment of larger dwellings into two or more smaller homes without the need to retain a family sized home. This could increase the number of conversions undertaken. The precise nature of the potential effect on the townscape is unknown, as the locations and design of conversions is not yet known. Therefore an uncertain effect has been recorded.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA4: The precise nature of potential effects for IIA4 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.

IIA5: The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.

IIA12: Further details of the developments likely to come forwards under this policy (such as design and location) are required in order to determine the precise nature of potential effects.

**Enhancements**

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	HO2: Conversion and redevelopment of larger dwellings - Alternative 3
Chapter	Chapter 04: Housing
Policy/alternative description	Option 3: Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m2 capable of providing a three-bed unit.
Assumptions Made	It has been assumed that this alternative would include proposed wording of Policy HO2, bar criterion 1b.

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?		Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This alternative 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 alternative 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?											
	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/Long	Localised	Permanent/Reversible	Minor Negative	This policy will reduce the minimum design standards for family homes in conversions. This could lead to families living in unsuitable housing, due to a shortage of family accommodation.	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	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 3 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there is no criteria to ensure at least one family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.	No	The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.	
	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 alternative 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	Alternative 3 contains a specific criteria 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: 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	Localised	Permanent/Reversible	Minor Positive	Criterion 3j of the preferred 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.	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										
	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												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No												
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Indirect	Low	Medium/Long	Localised	Permanent/Reversible	Minor Positive	An indirect minor positive effect has been identified for IIA11, as Alternative 3 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?													
	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/Long	Localised	Permanent/Reversible	Minor Positive	Alternative 3 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	Alternative 3 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?													
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?													
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)			Minor Positive	Alternative 3 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**

IIA5: Alternative 3 allows for the conversion of homes into multiple dwellings, providing certain criteria are met. This could help to meet housing needs by increasing the total number of dwellings in the Borough. However, it is noted that there is no criteria to ensure at least one family home is maintained. This could lead to an increase in the number of smaller dwellings and a decrease in the number of family sized homes, which may not meet the needs of the Borough. Therefore, an uncertain effect is identified as it is unclear if an increase in flats would help to meet current needs in the Borough.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA5: The precise nature of potential effects for IIA5 cannot be determined without details of the design and location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.

**Enhancements**

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	HO2: Conversion and redevelopment of larger dwellings - Alternative 4
Chapter	Chapter 04: Housing
Policy/alternative description	Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6
Assumptions Made	It has been assumed that this alternative would include proposed wording of Policy HO2, bar criterion 1c.

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/Irreversible	Minor Negative	This alternative 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 for all future residents. However, there is no requirement within this alternative to consider PTAL scores (access to frequent public transport). This could inhibit some residents from accessing services, employment or education, which is not in the immediate vicinity of converted dwellings. Additionally, this alternative may result in the intensification of existing residential uses in less accessible locations, which may impact residents access to local facilities and services. Therefore a minor negative 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?											
	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/Long	Localised	Permanent/Reversible	Minor Negative	This alternative 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. However, this alternative does not require accessibility of locations to be considered, which could restrict access to services required to maintain a healthy and active lifestyle. Additionally, this alternative may result in the intensification of existing residential uses in less accessible locations, which may impact residents access to local facilities and services. Hence an overall minor negative 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.
	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 (10yrs)	Localised	Permanent/Reversible	Significant Positive	Alternative 4 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										
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	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	Indirect	Low	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Negative	This alternative does not consider the accessibility of developments in relation to public transport and services. This could lead to the intensification of development in less accessible areas than the proposed policy/other alternatives. Therefore a minor negative effect has been recorded.	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										
	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?	Yes										
	Improve existing cycling and walking network and provide new routes?	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	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Negative	Alternative 3 contains a specific criterion (2e) which requires conversion developments to ensure there is adequate light, with limited noise exposure. However, the removal of the need to consider accessibility/PTAL scores could lead to an increase in car use, thus indirectly decreasing air quality. Therefore a potential minor negative effect has been recorded.	No		
	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No										
IIA8 Minimising Contributions to ...	Ensure 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	Uncertain	Criterion 2j of the preferred 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	No		The precise nature of potential effects for IIA8 cannot be determined without knowledge of the location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.
	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										

Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Minimise greenhouse gas emissions?	Yes								electric charging points. There is no requirement to consider the PTAL scores for conversions, which could lead to the intensification of development in areas of the Borough which require cars to access services, employment or education, thus increasing emissions. Further details of the locations of developments would be needed to ascertain the precise nature of effects for IIA8.			
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 alternative 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 alternative 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 and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No											
	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 Alternative 4 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	Alternative 4 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	Alternative 4 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?												
IIA14 Waste: To minimise waste.	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?												
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)			Minor Positive	Alternative 4 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**

IIA8: Criterion 2j of the preferred 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. There is no requirement to consider the PTAL scores for conversions, which could lead to the intensification of development in areas of the Borough which require cars to access services, employment or education, thus increasing emissions. Further details of the locations of developments would be needed to ascertain the precise nature of effects for IIA8.

**Significant Positive Effects**

IIA5: Alternative 4 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**

IIA8: The precise nature of potential effects for IIA8 cannot be determined without knowledge of the location of sites this alternative could apply to. However, it is noted that this is unlikely to be known in advance for the entire plan period.

**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	HO2: Conversion and redevelopment of larger dwellings - Alternative 5
Chapter	Chapter 04: Housing
Policy/alternative description	The proposed housing conversions policy should not apply to demolitions of a larger family sized home.
Assumptions Made	It has been assumed that this alternative would include proposed wording of Policy HO2, bar criterion 6.

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 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	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: education facilities? recreation facilities? health services?		Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	This alternative requires the focusing of development in areas with a higher PTAL score (3-6) and 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?												
	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/Long	Localised	Permanent/Reversible	Minor Positive	This alternative 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.	
	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 (10yrs)	Localised	Permanent/Reversible	Significant Negative	Alternative 5 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. However, this alternative removes the requirement to consider such factors when demolishing a dwelling for redevelopment. This could lead to fewer family homes in such instances, and could encourage some to demolish rather than redevelop sites. Therefore a potential significant negative effect has been recorded.	No	Limits to the application of removing such requirements for demolished dwellings could help to mitigate the potential negative 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?	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 alternative 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	Alternative 5 contains a specific criterion (3e) 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: 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	Criterion 3j of the preferred 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 neutral effect is identified.	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											
	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 alternative 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	Neutral	The alternative 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 and where appropriate improve the quality of the built environment	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Indirect	Low	Medium/Long	Localised	Permanent/Reversible	Significant Negative	An indirect minor positive effect has been identified for IIA11, as Alternative 5 requires conversions to retain existing entrances to dwellings where possible, and ensure external alterations of not detract from the appearance of properties. However, in cases of demolition, no such requirement will apply. This could lead to the design an creation of developments which are not in keeping with the current townscape.	No	Policies such as GR4: Building Heights could help to ensure the re-development design considers the locality of sites, however, the removal of criterion 3h "Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene" will be hard to mitigate without specific criteria in relation to demolition.		
	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											
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/Long	Localised	Permanent/Reversible	Significant Negative	Alternative 5 contains a number of criteria which should help to ensure conversions are undertaken in a sympathetic manner to the existing townscape, through careful design. However, this alternative does not require such considerations in the case of demolitions. This could lead to the erosion of the existing townscape. Therefore, a potential significant negative effect has been identified.	No	Policies such as GR4: Building Heights could help to ensure the re-development design considers the locality of sites, however, the removal of criterion 3h "Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene" will be hard to mitigate without specific criteria in relation to demolition.		
	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?												
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?												
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?												
	Encourage new developments to provide adequate space for waste separation?	Yes	Indirect	Low	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Negative	Alternative 5 removes the stringent requirements of the proposed policy from demolitions only. This could indirectly encourage demolition rather than refurbishment of buildings.	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**

IIA5: Alternative 5 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. However, this alternative removes the requirement to consider such factors when demolishing a dwelling for redevelopment. This could lead to fewer family homes in such instances, and could encourage some to demolish rather than redevelop sites. Therefore a potential significant negative effect has been recorded.  
 IIA11: An indirect minor positive effect has been identified for IIA11, as Alternative 5 requires conversions to retain existing entrances to dwellings where possible, and ensure external alterations of not detract from the appearance of properties. However, in cases of demolition, no such requirement will apply. This could lead to the design an creation of developments which are not in keeping with the current townscape.  
 IIA12: Alternative 5 contains a number of criteria which should help to ensure conversions are undertaken in a sympathetic manner to the existing townscape, through careful design. However, this alternative does not require such considerations in the case of demolitions. This could lead to the erosion of the existing townscape. Therefore, a potential significant negative effect has been identified.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA5: Limits to the application of removing such requirements for demolished dwellings could help to mitigate the potential negative effect identified.  
 IIA11: Policies such as GR4: Building Heights could help to ensure the re-development design considers the locality of sites, however, the removal of criterion 3h "Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene" will be hard to mitigate without specific criteria in relation to demolition.  
 IIA12: Policies such as GR4: Building Heights could help to ensure the re-development design considers the locality of sites, however, the removal of criterion 3h "Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene" will be hard to mitigate without specific criteria in relation to demolition.

**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.

Policy/Alternative name	HO2: Conversion and redevelopment of larger dwellings - Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map
Assumptions Made	It has been assumed that this alternative would include proposed wording of Policy HO2, with an additional map to indicate which areas of the Borough the policy applies to. Moreover, in areas which Policy HO2 does not apply, it is assumed that there would be additional policy wording limiting the conversion of larger dwellings, in order to protect these family sized homes.

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	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 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?		N/A	N/A	N/A	N/A	N/A	Uncertain	This alternative requires the focusing of development in areas with a higher PTAL score (3-6) and 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. However, it is currently unknown which areas of the Borough Alternative 6 would apply to and consequently if these areas have good access to services and facilities. Therefore an uncertain effect has been recorded.	No	The inclusion of accessibility as a consideration for the application of proposed Policy HO2/Alternative 6 could help to ensure a potential positive outcome for IIA3. Further details from the Harrow planning officers could help to mitigate the uncertain 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?											
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	This alternative 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. However, it is currently unknown which areas of the Borough Alternative 6 would apply to and consequently if these areas have good access to services and facilities. Therefore an uncertain effect has been recorded.	No	The inclusion of accessibility as a consideration for the application of proposed Policy HO2/Alternative 6 could help to ensure a potential positive outcome for IIA3. Further details from the Harrow planning officers could help to mitigate the uncertain 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?	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	Alternative 6 would guide development throughout the Borough, ensuring that the conversion of homes into multiple dwellings occurring in optimal locations, whilst other areas are protected as areas for family sized homes. 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 relative proportion of conversions out of the 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	Uncertain	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. However, the precise locations towards which development would be focused by Alternative 6 are not yet known, hence an uncertain effect has been recorded.	No	Further details of the locations for focussing the redevelopment of larger homes could help to mitigate the uncertain effect identified.	
	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	Alternative 6 (Policy HO2) contains a specific criterion (3e) 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: 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	Criterion 3j of the preferred 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 neutral effect is identified.	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										
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 alternative 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 alternative 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 and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No							An indirect minor positive effect has been identified for IIA11, as Alternative 6 (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.
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	Indirect	Low	Medium/L ong	Localised	Permanent/Reversible	Minor Positive				
	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							Alternative 6 (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		
	Respect, maintain and strengthen local landscape and townscape character and distinctiveness?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Reversible	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							Alternative 6 (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		
	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				
	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?											
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?								Alternative 6 (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		
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?											
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive				
	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**

IIA3: This alternative requires the focusing of development in areas with a higher PTAL score (3-6) and 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. However, it is currently unknown which areas of the Borough Alternative 6 would apply to and consequently if these areas have good access to services and facilities. Therefore an uncertain effect has been recorded.  
 IIA4: This alternative 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. However, it is currently unknown which areas of the Borough Alternative 6 would apply to and consequently if these areas have good access to services and facilities. Therefore an uncertain effect has been recorded.  
 IIA6: 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. However, the precise locations towards which development would be focused by Alternative 6 are not yet known, hence an uncertain effect has been recorded.

**Significant Positive Effects**

IIA5: Alternative 6 would guide development throughout the Borough, ensuring that the conversion of homes into multiple dwellings occurring in optimal locations, whilst other areas are protected as areas for family sized homes. 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 relative proportion of conversions out of the total residential development.

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: The inclusion of accessibility as a consideration for the application of proposed Policy HO2/Alternative 6 could help to ensure a potential positive outcome for IIA3. Further details from the Harrow planning officers could help to mitigate the uncertain effect identified.  
 IIA4: The inclusion of accessibility as a consideration for the application of proposed Policy HO2/Alternative 6 could help to ensure a potential positive outcome for IIA3. Further details from the Harrow planning officers could help to mitigate the uncertain effect identified.  
 IIA6: Further details of the locations for focussing the redevelopment of larger homes could help to mitigate the uncertain effect identified.

**Enhancements**

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 HO4 Genuinely Affordable Housing: Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 1: To put a greater emphasis on intermediate products.
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					
<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: 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															
	<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 negative	Alternative 1 could help to provide some affordable housing, but would have a greater provision of intermediate products. Although intermediate products are classed as a type of affordable housing, the Local Housing Needs Assessment shows that they are usually the least affordable out of the options provided. This could subsequently limit provision for the identified need for affordable housing within the Borough and could worsen the issues identified, although it is noted that this could help to make developments more viable for developers. Therefore, a potential significant negative effect has been identified for IIA5.	No	No mitigation is proposed, as the proposed policy HO4 addresses the negative 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?	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> 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															





Policy/Alternative name	Policy H05 Housing Estate Renewal and Regeneration: Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Alternative 1: No policy
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 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	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 1 would leave no policy regarding the regeneration of estates within Harrow Local Plan. There are no supporting policies within the NPPF or London Plan which could be relied on in the absence of a Harrow-specific policy, yet there is an identified need to regenerate older estate developments for replacement with newly designed, energy efficient developments. This would help to improve the quality and accessibility of homes. However, it is noted that regeneration without a policy could provide a more attractive proposition for developers, which could increase the likelihood of regeneration. Overall, an uncertain effect is likely to result for IIA objectives 3.	No	Further details of the proposed sites would be required to determine the precise nature of effects.	
	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?	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	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?												
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	Alternative 1 would leave no policy regarding the regeneration of estates within Harrow Local Plan. There are no supporting policies within the NPPF or London Plan which could be relied on in the absence of a Harrow-specific policy, yet there is an identified need to regenerate older estate developments for replacement with newly designed, energy efficient developments. This would help to improve the quality of homes, whilst also providing an opportunity to intensify residential development in existing residential areas. However, it is noted that regeneration without a policy could provide a more attractive proposition for developers, which could increase the likelihood of regeneration. Overall, an uncertain effect is likely to result for IIA objectives 5.	No	Further details of the proposed sites would be required to determine the precise nature of effects.	
	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										
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 alternative 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 alternative 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 alternative 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	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 alternative 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 alternative 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 and where appropriate improve the quality of the built environment	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 alternative 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											
		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 alternative 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	N/A	Neutral	The alternative 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											
		No											
	Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?	No											
	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 alternative 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											
		No											
	Safeguard existing waste management sites?	No											

**Significant Negative and Uncertain Effects**

IIA3: Alternative 1 would leave no policy regarding the regeneration of estates within Harrow Local Plan. There are no supporting policies within the NPPF or London Plan which could be relied on in the absence of a Harrow-specific policy, yet there is an identified need to regenerate older estate developments for replacement with newly designed, energy efficient developments. This would help to improve the quality and accessibility of homes. However, it is noted that regeneration without a policy could provide a more attractive proposition for developers, which could increase the likelihood of regeneration. Overall, an uncertain effect is likely to result for IIA objectives 3.

IIA5: Alternative 1 would leave no policy regarding the regeneration of estates within Harrow Local Plan. There are no supporting policies within the NPPF or London Plan which could be relied on in the absence of a Harrow-specific policy, yet there is an identified need to regenerate older estate developments for replacement with newly designed, energy efficient developments. This would help to improve the quality of homes, whilst also providing an opportunity to intensify residential development in existing residential areas. However, it is noted that regeneration without a policy could provide a more attractive proposition for developers, which could increase the likelihood of regeneration. Overall, an uncertain effect is likely to result for IIA objectives 5.

**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.

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: Further details of the proposed sites would be required to determine the precise nature of effects.  
IIA5: Further details of the proposed sites would be required to determine the precise nature of effects.

**Enhancements**

Policy/Alternative name	Policy H05: Housing Estate Renewal and Regeneration - Alternative 2
Chapter	Chapter 04: Housing
Policy/alternative description	Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).
Assumptions Made	It has been assumed that proposed Policy H05 would be included with this alternative, with the requirement for re-provision of external open space replacing criterion H of the proposed policy.

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 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	N/A	N/A	N/A	N/A	N/A	Uncertain	Whilst this alternative will not produce additional services or facilities, it does require estate redevelopment to consider links to public transport and an active travel modes such as cycling. The alternative also requires redevelopment design to consider the provision of play parks and informal space, although it is noted that the use of informal space by adults is not recognised as strongly in London Plan Policy S4 which it refers to. Policy H05 Alternative 2 also requires that all development re-provides any external open space lost through regeneration to ensure no net loss. Whilst this could help to maintain access to open space for future residents, there is a risk that the need to provide external open space may have impacts on the potential to provide community/recreational facilities. Therefore, an uncertain effect has been recorded.	No	Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of effect identified.												
	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?	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	Uncertain	Alternative 2 would require any lost external open space to be re-provided, ensuring no net loss through regeneration. Moreover, 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". Whilst this could help to maintain access to open space for future residents, there is a risk that the need to provide external open space may have impacts on the potential to provide community/recreational facilities. Therefore, an uncertain effect has been recorded.	No	Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of 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?		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?																							
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	This alternative 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. However, the requirement to maintain amenity space could compromise the quantity of housing delivered, ensuring the right size and tenure are delivered, as well as provision of community of other facilities. Therefore, an overall uncertain effect has been recorded.	No	Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of 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?	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	Medium	Medium (10yrs)	Localised	Permanent/Reversible	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																					
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 alternative 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	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																					
	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 alternative 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	Indirect	Low	Long (20+ yrs)	Localised	Permanent/Irreversible	Minor Positive	External amenity space is commonly open grassland, trees and hedges. Alternative 2 requires the re-provision of such space within the regeneration design, thus helping to maintain (and potentially improve) biodiversity within the Borough.	No		It is recommended that a new criterion is added related to maintaining or improving the biodiversity and green infrastructure present on site, in accordance with Policies G12, G13 and G15. A criteria encouraging redevelopment to link into existing green infrastructure in the vicinity of estates could also help to modify the potential effect to a more positive one.
	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 and where appropriate improve the quality of the built 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 alternative 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 H05 (Alternative 2) 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 mineral resources	Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?	Yes	Direct	Medium	Medium (10 yrs)	Localised	Permanent/Reversible	Minor Positive	This alternative 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	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										
		No										
	Safeguard existing waste management sites?											

**Significant Negative and Uncertain Effects**

IIA3: Whilst this alternative will not produce additional services or facilities, it does require estate redevelopment to consider links to public transport and an active travel modes such as cycling. The alternative also requires redevelopment design to consider the provision of play parks and informal space, although it is noted that the use of informal space by adults is not recognised as strongly in London Plan Policy S4 which it refers to. Policy H05 Alternative 2 also requires that all development re-provides any external open space lost through regeneration to ensure no net loss. Whilst this could help to maintain access to open space for future residents, there is a risk that the need to provide external open space may have impacts on the potential to provide community/recreational facilities. Therefore, an uncertain effect has been recorded.

IIA4: Alternative 2 would require any lost external open space to be re-provided, ensuring no net loss through regeneration. Moreover, 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". Whilst this could help to maintain access to open space for future residents, there is a risk that the need to provide external open space may have impacts on the potential to provide community/recreational facilities. Therefore, an uncertain effect has been recorded.

IIA5: This alternative 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. However, the requirement to maintain amenity space could compromise the quantity of housing delivered, ensuring the right size and tenure are delivered, as well as provision of community of other facilities. Therefore, an overall uncertain effect has been recorded.

**Significant Positive Effects**

IIA6: 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

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of effect identified.  
IIA4: Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of effect identified.  
IIA5: Details of estates for redevelopment, such as site locations and design of sites would assist in determining the precise nature of effect identified.

**Enhancements**

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.  
IIA10: It is recommended that a new criterion is added related to maintaining or improving the biodiversity and green infrastructure present on site, in accordance with Policies G12, G13 and G15. A criteria encouraging redevelopment to link into existing green infrastructure in the vicinity of estates could also help to modify the potential effect to a more positive one.

Policy/Alternative name	Policy HO6: Accommodation for Older People - Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Continue existing Local Plan policy approach (DM 29): The Council will support proposals on previously-developed land for sheltered housing, care homes and extra care housing (across all tenures) for older people and those who may be vulnerable, provided that the proposal is accessible by public transport with good access to local amenities including shops and community facilities. B. The loss of care homes or sheltered housing will only be supported where it can be reasonably demonstrated there is no longer a demand for that use on the site.
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 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	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Existing Policy DM29 (Alternative 1) requires development for sheltered housing, care homes and extra care housing to be "accessible by public transport with good access to local amenities including shops and community facilities". Whilst this will not produce additional services or facilities, it is 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?	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	Indirect	Low	Medium (10yrs)			Minor Positive	Existing Policy DM29 (Alternative 1) requires development for sheltered housing, care homes and extra care housing to be "accessible by public transport with good access to local amenities including shops and community facilities". This 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	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?	No	Direct	Low	Medium (10yrs)	Borough Wide		Minor Positive	Alternative 1 (Existing Policy DM29) will provide sheltered housing, care homes and extra care housing within the Borough, in locations with good access to public transport, shops and services. Loss of such developments will be limited to cases where there is no longer a need for such housing.	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)?	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		Minor Positive	Existing Policy DM29 (Alternative 1) will not directly increase public or active travel routes, the focussing of development in areas with public transport links and access to local shops and community facilities 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										
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	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		
	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										
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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 ultralow emissions vehicles?	No										
	Promote a low carbon local economy?	No										
IIA9 Adaptation to Climate Change:	Ensure new developments are energy efficient?	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		
	Minimise greenhouse gas emissions?	No										
	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 alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No		

Adapt to the effects of climate change including flood risk, extreme weather and reduced	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	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			
	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 and where appropriate improve the quality of the built environment	Protect sites of geological importance?	No							The alternative 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	N/A	N/A	N/A	N/A	N/A	Neutral					
	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 alternative 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							Alternative 1 (Existing Policy DM29) encourages development for sheltered housing, care homes and extra care housing to be located on previously developed land.	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/Irreversible	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											
	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							The alternative 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?	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

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 HO6: Accommodation for Older People - Alternative 2
Chapter	Chapter 04: Housing
Policy/alternative description	Support proposals within/edge of town centres (excluding neighbourhood centres)
Assumptions Made	It has been assumed that proposed Policy HO6 will be the basis of this alternative, with the addition of town centre to criterion 1f.

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	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 2 requires development for older people is located in areas easily accessible by public transport, as well as within or on the edge of town centres. Whilst this will not produce additional services or facilities, it could increase the accessibility of such services for future residents and ensure that there is an established community nearby. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.	No	The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible for future residents.		
	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 be 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	N/A	N/A	N/A	N/A	N/A	Uncertain	The focusing of development in areas with a higher PTAL score (3-6) and nearby to town centres could indirectly help to ensure future residents are able to utilise active travel such as walking. This could also help to ensure close proximity to a local community to assist maintaining good wellbeing. However, it is noted that some town centres have poor public transport access hence an uncertain effect has been recorded.	No	The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible for future residents.		
	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?	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											
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?	Yes											
	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	Uncertain	Whilst this alternative 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. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.	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 alternative 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	Uncertain	Alternative 2 (Policy HO6) encourages the provision of charging points for mobility scooters and directs development into areas with a PTAL score of 3-6, as well as requiring accommodation for older people to sit within or on the edge of town centres thus residents will be encouraged to use sustainable transport modes. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.	No	The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible by foot or public transport.		
	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?	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 alternative 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	Neutral	The alternative 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 and where appropriate improve the quality of the built 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 alternative 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 alternative 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 alternative 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 alternative 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**

IIA3: Alternative 2 requires development for older people is located in areas easily accessible by public transport, as well as within or on the edge of town centres. Whilst this will not produce additional services or facilities, it could increase the accessibility of such services for future residents and ensure that there is an established community nearby. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.

IIA4: The focusing of development in areas with a higher PTAL score (3-6) and nearby to town centres could indirectly help to ensure future residents are able to utilise active travel such as walking. This could also help to ensure close proximity to a local community to assist maintaining good wellbeing. However, it is noted that some town centres have poor public transport access hence an uncertain effect has been recorded.

IIA6: Whilst this alternative 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. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.

IIA8: Alternative 2 (Policy HO6) encourages the provision of charging points for mobility scooters and directs development into areas with a PTAL score of 3-6, as well as requiring accommodation for older people to sit within or on the edge of town centres thus residents will be encouraged to use sustainable transport modes. However, it is noted that some town centres have poor public transport access (particularly in the north of the Borough), which could lead to some development leading to private car/taxi use. Therefore, an uncertain effect has been identified.

**Significant Positive Effects**

IIA5: 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.

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible for future residents.

IIA4: The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible for future residents.

IIA8: The addition of wording to the effect of developments needing to be in areas of higher PTAL scores and close proximity to town centres could help to ensure services are all accessible by foot or public transport.

**Enhancements**

Policy/Alternative name	Policy HO6: Accommodation for Older People - Alternative 3
Chapter	Chapter 04: Housing
Policy/alternative description	Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period
Assumptions Made	It has been assumed that proposed Policy HO6 will be the basis of this alternative, with the addition of town centre to criterion 1f.

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 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	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Alternative 3 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 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?	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 be 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)			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. 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?	No	N/A	N/A	N/A	N/A	N/A	Uncertain	Alternative 3 will provide a total of 2300 dwellings for older people over the local plan period, ensuring the need for such accommodation is met alongside staff accommodation, and affordable dwellings. Designs will also need to provide wheelchair accessibility in at least 10% of dwellings, rising to 100% of habitable rooms in care homes. However, there is some uncertainty regarding the total need of this type of accommodation over the plan period, which could lead to surplus provision. This could make it harder to meet needs for other types of accommodation, such as family sized dwellings. Therefore, an uncertain 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)?	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)?	Yes											
IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	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 (10yrs)	Localised	Permanent/Reversible	Minor Positive	Whilst this alternative 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.	
	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											
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	Increase and improve opportunities to access public transport including where there are existing issues (such as steps)?	Yes	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			
	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											
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Alternative 3 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			
	Reduce greenhouse gas emissions?	Yes											
	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											
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced	Promote a low carbon local economy?	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			
	Ensure new developments are energy efficient?	No											
	Minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?	No											
IIA10 Biodiversity: To safeguard and enhance biodiversity and	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 alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	No			
	Minimise 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											

diversity and connectivity and improve connectivity between, and access to, green spaces and functional habitats.	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 and where appropriate improve the quality of the built 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 alternative 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 alternative 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?	Yes										
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?	No							The alternative 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?	Yes	N/A	N/A	N/A	N/A	N/A	Neutral				
	Avoid development of greenfield land?	Yes										
	Promote the efficient use of minerals?	No										
	Protect soil quality and avoid soil pollution?	No										
IIA14 Waste: To minimise waste.	Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?	No							The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	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	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**

IIA5: Alternative 3 will provide a total of 2300 dwellings for older people over the local plan period, ensuring the need for such accommodation is met alongside staff accommodation, and affordable dwellings. Designs will also need to provide wheelchair accessibility in at least 10% of dwellings, rising to 100% of habitable rooms in care homes. However, there is some uncertainty regarding the total need of this type of accommodation over the plan period, which could lead to surplus provision. This could make it harder to meet needs for other types of accommodation, such as family sized dwellings. Therefore, an uncertain effect has been recorded.

**Significant Positive Effects**

**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 - Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	Continue existing Local Plan policy approach (DM 29): The Council will support proposals on previously-developed land for sheltered housing, care homes and extra care housing (across all tenures) for older people and those who may be vulnerable, provided that the proposal is accessible by public transport with good access to local amenities including shops and community facilities. B. The loss of care homes or sheltered housing will only be supported where it can be reasonably demonstrated there is no longer a demand for that use on the site.
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 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											
<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 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											
<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	Indirect	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Existing Policy DM29 (Alternative 1) requires development for sheltered housing, care homes and extra care housing to be "accessible by public transport with good access to local amenities including shops and community facilities". Whilst this will not produce additional services or facilities, it is 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?	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	Indirect	Low	Medium (10yrs)			Minor Positive	Existing Policy DM29 (Alternative 1) requires development for sheltered housing, care homes and extra care housing to be "accessible by public transport with good access to local amenities including shops and community facilities". This 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	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	Direct	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	Alternative 1 (Existing Policy DM29) will provide sheltered housing, care homes and extra care housing within the Borough, in locations with good access to public transport, shops and services. Loss of such developments will be limited to cases where there is no longer a need for such housing.	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)?	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	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Positive	Existing Policy DM29 (Alternative 1) will not directly increase public or active travel routes, the focussing of development in areas with public transport links and access to local shops and community facilities 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?	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											
<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	Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?	No						Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	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											
<b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases	Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?	No						Neutral	The alternative neither supports nor detracts from the achievement of the IIA objective. Therefore a neutral effect is predicted.	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 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	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 alternative 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	Neutral	The alternative 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 and where appropriate improve the quality of the built 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 alternative 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 alternative 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?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Irreversible	Minor Positive	Alternative 1 (Existing Policy DM29) encourages development for sheltered housing, care homes and extra care housing to be located on previously developed land.	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?	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 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	Policy HO8 Purpose Built Student Accommodation: Alternative 1
Chapter	Chapter 04: Housing
Policy/alternative description	The alternative is for no policy option to be implemented.
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	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Negative	A lack of policy means that the development of student accommodation may not be encouraged in areas with good access to services and facilities, such as on the edge of town centres. This could increase the need for future residents to travel to access facilities. Therefore, a potential minor negative effect is identified.	No	Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility by sustainable modes.	
	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	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Negative	A lack of policy may mean that the design of student accommodation and its location may not be controlled. Access to amenity space or proximity to open space and recreation facilities may not be provided nor access by foot/cycle to facilities. Therefore a potential minor negative effect has been identified.	No	Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility to facilities including recreation, open space by walking/cycling and other sustainable modes.	
	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	Alternative 1 will help to deliver student accommodation within the Borough over the lifetime of the plan although without a specific policy, the location and design may be less controlled than if there were a policy. 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 Negative	A lack of policy means that the development of student accommodation may not be encouraged in areas with good access to services and facilities, such as on the edge of town centres. This could increase the need for future residents to travel to access facilities. Therefore, a potential minor negative effect is identified.	No	Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility by sustainable modes.	
	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	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 and where appropriate improve the quality of the built 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.	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

IIA3: Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility by sustainable modes.

IIA4: Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility to facilities including recreation, open space by walking/cycling and other sustainable modes.

IIA6: Mitigation: The inclusion of a policy referencing Purpose Built Student Accommodation and that it should be located in areas with good accessibility by sustainable modes.

Enhancements

Policy/Alternative name	Policy HO8: Purpose Built Student Accommodation - Alternative 2
Chapter	Chapter 04: Housing
Policy/alternative description	Allow PBSA schemes within accessible locations with PTAL 3-6
Assumptions Made	It has been assumed that proposed Policy HO8 will remain unchanged, expect for the addition of PTAL scores as a consideration in criterion 1bil.

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	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 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	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, as well as in areas with high PTAL scores. 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 Negative	Alternative 2 sets out that new provision of student accommodation should be located within close proximity to shops, services and facilities which future residents may require. PTAL scores will also need to be high in locations for development to ensure access to public transport. 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. However, the absence of any reference to outside space or green infrastructure within this policy could inhibit wellbeing, as not all students will be able to afford paid-for recreation facilities to maintain physical and mental health. Therefore a potential minor negative 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?	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?										
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	Alternative 2 encourages the development of student accommodation in areas with good access to services and facilities, with high PTAL scores and 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?	Yes	Direct	Low	Medium (10yrs)	Localised	Permanent/Reversible	Minor Negative	This alternative would encourage student accommodation development within areas with a high PTAL score. It is noted that residential areas currently coincide with many of these locations, as may future developments encouraged by Chapter 04 of the Local Plan. This could lead to tension between residents with families and students from noise issues, particularly during anti-social hours.	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 alternative 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	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 alternative 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	Neutral	The alternative 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 and where appropriate improve the quality of the built 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 alternative 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 alternative 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											
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 alternative 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 alternative 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

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: Alternative 1
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is for no policy option to be implemented.
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?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA1 as the absence of a policy means that reliance will have to be placed on national and London Plan policies for determining proposals. This may result in LSPBSL schemes being developed outside of the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre, that form part of the Opportunity Area. This may also result in LSPBSL schemes being developed without the inclusion of flexible workspace, removing the provision workspace for the internal and external residents, as well as any opportunities to create commercial networks, attract investment, boost economic growth and help achieve the Borough's economic objectives. Therefore, a potential minor negative effect is recorded.		Mitigation: The inclusion of a policy referencing Large Scale Purpose Built Shared Living.												
	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																					
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	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Negative	The alternative does not support the achievement of objective IIA2 as the absence of a policy means that reliance will have to be placed on national and London Plan policies for determining proposals. This may result in LSPBSL schemes being developed without the inclusion of flexible workspace, removing the provision workspace for the internal and external residents, as well as any opportunities to create additional jobs. Therefore, a potential minor negative effect is recorded.		Mitigation: The inclusion of a policy referencing Large Scale Purpose Built Shared Living.												
	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 alternative 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/Long	Borough Wide	Permanent/Reversible	Minor Negative	The alternative does not support the achievement of objective IIA4 as the absence of a policy means that reliance will have to be placed on national and London Plan policies for determining proposals. This may result in LSPBSL schemes being developed without the inclusion of public amenities, removing a quality of community cohesion from the development. Therefore, a potential minor negative effect is recorded.		Mitigation: The inclusion of a policy referencing Large Scale Purpose Built Shared Living.	
		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?	Yes	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA5 as the absence of a policy means that reliance will have to be placed on national and London Plan policies for determining proposals. It would also be difficult to request developers to demonstrate proposals for LSPBSL development are addressing a local identified need, which may lead to an over-concentration of LSPBSL developments. This could make it difficult for the Council to ensure that the identified local housing need is being met, especially regarding the provision of conventional C3 self-contained housing such as family housing. Therefore, a potential minor negative effect is recorded.		Mitigation: The inclusion of a policy referencing Large Scale Purpose Built Shared Living.												
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	The absence of a policy means that reliance will have to be placed on national and London Plan policies for determining the location of proposals. Although the London Plan (2021) requires schemes to be "located in an area well-connected to local services and employment by walking, cycling and public transport", these may not be areas the local council would deem appropriate, such as areas characterised by family housing. Therefore, as proposed developments may be located in an area that is not entirely appropriate, an uncertain effect is recorded.		Mitigation: The inclusion of a policy referencing Large Scale Purpose Built Shared Living.												
	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 alternative 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 alternative 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 alternative 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 alternative 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																					



Policy/Alternative name	H09 Large Scale Purpose Built Shared Living: Alternative 2
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to not require applicants to demonstrate a need for LSPBSL.
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	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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.				
	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												
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	Low	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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											
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 alternative 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. The development of the LSPBSL scheme should not have a detrimental impact to the need to support and maintain mixed and inclusive communities. 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											
	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	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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) 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. 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.				
	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											
	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											
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	Minor Negative	The alternative supports the provision of LSPBSL schemes, which will contribute to the number of additional homes being delivered within the Borough. The policy highlights that proposals for the development of LSPBSL schemes will require affordable housing contributions, in line with London Plan Policy H16. However, proposals will not be required to demonstrate how they are meeting an identified local housing need, making it more difficult for the Council to monitor how development is addressing the priority needs of the area (affordable housing and family sized dwellings). Where there is an overconcentration of LSPBSL schemes, the development of alternative town centre use such as offices, and C1 hotels or mixed-use schemes will be preferred. Therefore, a potential minor negative 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?	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/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 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?	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 alternative 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 alternative 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 alternative 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 alternative 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											
	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 and where appropriate improve the quality of the built 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 alternative 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?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 in order to avoid a detrimental impact on the character of the surrounding area. 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 alternative 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/Irreversible	Minor Positive	The alternative 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	H09 Large Scale Purpose Built Shared Living: Alternative 3
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6.
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/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative supports the achievement of objective IIA1 as it highlights that proposals for the development of LSPBSL schemes should be located within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) or PTAL 3-6. This is because these areas are 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.														
	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?	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	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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																					
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/Reversible	Minor Positive	The alternative 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. The development of the LSPBSL scheme should not have a detrimental impact to the need to support and maintain mixed and inclusive communities. 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	Medium	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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) 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. 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?		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 alternative supports the provision of LSPBSL schemes, which will contribute to the number of additional homes being delivered within the Borough. 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. However, by allowing the development of LSPBSL schemes in more areas of the Borough, this may lead to the delivery of a significant number of LSPBSL schemes, which may undermine the delivery of smaller family housing, required to meet the housing needs of the Borough. It must also be considered that alternative town centre use such as offices, and C1 hotels or mixed-use schemes will be preferred to the development of LSPBSL schemes, and this may subsequently reduce the provision of them. Therefore, an uncertain 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?	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/L ong	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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 or 3-6, characterised by 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																					
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 alternative 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 alternative 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 alternative 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 alternative 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 and where appropriate improve the quality of the built 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 alternative 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?	Yes	Direct	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA12 as it allows the development of LSPBSL schemes across wider areas of the Borough locations (Metropolitan and Major Town Centres and all areas of PTAL 5-6 or PTAL 3-6). This is a particular issue as LSPBSL schemes tend to be built at higher densities and are likely to require 4 or more storeys development; this would subsequently impact character and amenities of areas characterised by two-storey family housing. Therefore, a potential minor negative 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 alternative 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 alternative 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								
		No								
	Safeguard existing waste management sites?	No								

**Significant Negative and Uncertain Effects**

IIA5: The alternative supports the provision of LSPBSL schemes, which will contribute to the number of additional homes being delivered within the Borough. 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. However, by allowing the development of LSPBSL schemes in more areas of the Borough, this may lead to the delivery of a significant number of LSPBSL schemes, which may undermine the delivery of smaller family housing, required to meet the housing needs of the Borough. It must also be considered that alternative town centre use such as offices, and C1 hotels or mixed-use schemes will be preferred to the development of LSPBSL schemes, and this may subsequently reduce the provision of them. Therefore, an uncertain effect is recorded.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

**Enhancements**

Policy/Alternative name	HO9 Large Scale Purpose Built Shared Living: Alternative 4
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to not include distance test for assessing over concentration of LSPBSL
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	Direct	Medium	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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.														
	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																					
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	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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																					
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/Long	Borough Wide	Permanent/Reversible	Uncertain	The alternative supports the development of LSPBSL schemes that are well designed and highly accessible, to meet needs of all users. LSPBSL schemes should not have a detrimental impact on the need to support and maintain mixed and inclusive communities. However, the removal of the distance test for assessing the concentration of LSPBSL schemes may impact on the objective of promoting mixed and inclusive communities, due to subsequent overconcentration. Therefore, a potential uncertain 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	Medium	Medium/Long	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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) 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. 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?		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 alternative supports the provision of LSPBSL schemes, which will contribute to the number of additional homes being delivered within the Borough. 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. For example, proposals for the development of LSPBSL schemes will require affordable housing contributions, in line with London Plan Policy H16 and the affordability of the scheme will have to be demonstrated in comparison to alternative housing products within the Harrow private rental sector. However, the removal of the distance test for assessing the concentration of LSPBSL schemes is likely to make it more difficult to address priority housing needs in the correct areas, such as the delivery of smaller family housing. Therefore, an uncertain 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?	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/Long	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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 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?	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																					
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	N/A	N/A	N/A	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 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																					
IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	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																					
IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	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																					
IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	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																					
	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																						





Policy/Alternative name	HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to continue to apply the existing HMO policy (Policy DM30 Large Houses in Multiple Occupation, Hostels and Secure Accommodation).
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 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	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 ageing population, including: education facilities? recreation facilities? health services?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative supports the achievement of objective IIA3 as it highlights that proposals for HMO developments should be designed with accessibility in mind; proposals must accord with Accessible Homes standards and provide satisfactory living conditions for the intended occupier. 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 alternative neither supports nor detracts from the achievement of the IIA objective. The alternative is open to wide interpretation and may not deliver the health benefits that the preferred policy would. 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?	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	Medium	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not provide support for the achievement of objective IIA5 as although the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough, the alternative makes no provision for the protection of family homes from conversion. This may contribute to the potential loss of larger- as well as affordable- housing in areas that are characterised by family housing. As this type of housing is deemed important for local needs, this could have a negative impact on the area. Therefore, a potential minor negative 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											
	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											
	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
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											
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 alternative 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. 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											
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 alternative 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 alternative 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												
IIA11 Historic Environment: Maintain and enhance access to cultural heritage assets?	Conserve and/or enhance heritage assets, historic environment, and their settings?	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.				
	Maintain and enhance access to cultural heritage assets?	No											



Policy/Alternative name	HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to allow conversion of family houses to HMOs (i.e. no consideration of the houses internal floor area (130m2) and the character of the area)
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.												
	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 ageing population, including: oeducation facilities? orecreation facilities? ohealth services?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 alternative highlights that proposals for HMO developments must provide living spaces that benefit the health and wellbeing of residents through design and accessibility. Utilising smaller housing (below 130m2) may make this difficult to achieve although such a proposal would still be expected to meet the requirements relating to internal space / access / amenity etc. Adequate provision of amenity space should be made in relation to access to gardens, communal facilities/areas, 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.		Mitigation: Provide minimum housing/room dimensions that should be met, that qualify as adequate to benefit the health and wellbeing of residents.
		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 Negative	The alternative does not provide support for the achievement of objective IIA5 as although the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough, allowing the conversion of family houses to HMOs (defined as homes where the internal floor area exceeds 130m2) may contribute to the potential loss of housing in areas that are characterised by family sized housing (including those with an internal floor area below 130m2). As this type of housing is more affordable for younger/lower income households compared to larger sized family housing, this could have a negative impact on the area. It is also more difficult to replace this type of housing. Therefore, a potential significant negative effect is recorded.		Mitigation: Restrict development of HMOs in areas characterised by family housing.										
	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?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 alternative 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 alternative 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 alternative 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. 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 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																			
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 alternative 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. 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																			
	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 alternative neither supports nor detracts from the achievement		

<b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	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?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Negative		The alternative does not provide support for the achievement of objective IIA12 as allowing the conversion of family sized housing to HMOs (including homes where the internal floor area is below 130m2), could contribute to the potential loss of larger housing in areas that are characterised by family housing. This could have a negative impact on the character of the area. Therefore, a potential minor negative 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 alternative 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																		
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium/L ong	Borough Wide	Permanent/Reversible	Minor Positive		The alternative 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 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**

IIA5: The alternative does not provide support for the achievement of objective IIA5 as although the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough, allowing the conversion of family houses to HMOs (defined as homes where the internal floor area exceeds 130m2) may contribute to the potential loss of housing in areas that are characterised by family sized housing (including those with an internal floor area below 130m2). As this type of housing is more affordable for younger/lower income households compared to larger sized family housing, this could have a negative impact on the area. It is also more difficult to replace this type of housing. Therefore, a potential significant negative effect is recorded.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA4: Mitigation: Provide minimum housing/room dimensions that should be met, that qualify as adequate to benefit the health and wellbeing of residents.  
 IIA5: Mitigation: Restrict development of HMOs in areas characterised by family housing.  
 IIA12: Mitigation: Restrict development of HMOs in areas characterised by family housing.

**Enhancements**

Policy/Alternative name	HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to allow HMOs within accessible locations with a PTAL 3-6.
Assumptions Made	Assumption: The following statement included in the preferred policy is does not apply to the alternative policy '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'.

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?	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?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 alternative 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	Minor Negative	The alternative does not provide support for the achievement of objective IIA5 as although the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough, allowing the development of HMOs within accessible locations with a PTAL 3-6 could potentially increase the loss of family housing. As this type of housing is deemed important for local needs, this could have a negative impact on the area. Therefore, a potential minor negative effect is recorded.			Mitigation: Restrict development of HMOs in areas characterised by family housing.					
	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															
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?	Yes															
	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 alternative 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 3-6 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 alternative 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 alternative 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 alternative 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. 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 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															
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 alternative 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. 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															
	Conserve and/or enhance heritage assets, historic environment, and their settings?	No	N/A	N/A	N/A	N/A	N/A	Neutral					The alternative neither supports nor detracts from the achievement				



Policy/Alternative name	HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 4
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is to not include a specific measure to assess the over concentration of HMO's.
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.						
	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?	No	Direct	Low	Medium/L ong	Borough Wide	Permanent/Irreversible	Minor Negative	The alternative does not provide support for the achievement of objective IIA3 as the lack of a specific measures to assess the over concentration of the property type means that the inclusivity and balance of these properties cannot be effectively managed, which may negatively impact on the inclusivity of communities. It may also lead to families living in unsuitable accommodation, in areas with poor access to public transport, local services and facilities. Therefore, a potential minor negative effect is recorded.		Mitigation: The policy should include a measure to assess the over concentration of HMOs, to mitigate against a negative impact on inclusivity and accessibility.				
	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 alternative 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	Minor Negative	The alternative does not provide support for the achievement of objective IIA5 as although the provision of HMO developments will contribute to the number of additional homes being delivered within the Borough, by removing the measure to assess the over concentration of HMO's, too many may be developed, leading to the loss of family housing. As this type of housing is deemed important for local needs, this could have a negative impact on the area. Therefore, a potential minor negative effect is recorded.		Mitigation: The policy should include a measure to assess the over concentration of HMOs, to mitigate against a negative impact on family housing within the Borough.				
	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?	Yes	Direct	Medium	Medium (10yrs)	Borough Wide	Permanent/Irreversible	Minor Positive	The alternative 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 alternative 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 alternative 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?	Yes	Indirect	Low	Medium (10yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The alternative 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. 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 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													
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 alternative 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. 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														
IIA11 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 alternative 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	HO12 Gypsy and Traveller Accommodation Needs: Alternative 1
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is for no policy option to be implemented. The Government included a revised wider definition for gypsies and travellers in the updated NPPF. The Council will consider
Assumptions Made	The London Plan and National Planning Policy requires new Gypsy and Traveller sites to make adequate provision for basic amenities (water, sewerage, waste management).

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.								
	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	N/A	N/A	N/A	N/A	N/A	Uncertain	The alternative policy indicates that Watling Farm sites has capacity to accommodate any future additional needs, if they arise, due to a 1974 permission for 15 pitches. However, a lack of policy would mean that proposals for new and replacement accommodation managed via the London Plan and National Planning Policy, may not be guided towards areas with reasonable access to public transport, in order to easily access community facilities and services. Therefore, an uncertain effect is recorded.		Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.						
	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															
	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	Localised	Permanent/Irreversible					Significant Negative	The alternative does not support the achievement of objective IIA4 as a lack of policy would mean that new and replacement accommodation may not be located in areas with reasonable access to public transport, in order to easily access community facilities and services. Additionally, proposals for new and replacement accommodation managed via the London Plan and National Planning Policy may not make adequate provision for amenity space and play areas for residents, or make provision for safe and acceptable living environments. Therefore, a potential significant negative effect is recorded.		Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, facilities to be provided and their preferred location.	
		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?		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	Localised	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA5 as the London Plan/National Planning Policy may not be effective in bringing sites/pitches forward for development, as stakeholders may find it difficult to identify and address issues and considerations for their proposal, such as the scale and acceptable locations. Therefore, a potential minor negative effect is recorded.		Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.					
		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?	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	N/A	N/A	N/A	N/A	N/A	Uncertain					A lack of policy may mean that new and replacement accommodation is not located in areas with reasonable access to public transport, in order to easily access community facilities and services. Therefore, due to uncertainty surrounding where new and replacement provision would be provided under his alternative, an uncertain effect is identified.		Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.	
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 alternative 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 alternative 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/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative supports the achievement of objective IIA9 new and replacement accommodation has to take the potential impacts of flood risk and climate change into account when decided on the location of new pitches or sites, in line with the London Plan (2021) and National Planning Policy. This could subsequently minimise the impacts of climate change on Gypsy and Traveller pitches and sites. 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															
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	Uncertain	A lack of policy may mean that new and replacement accommodation for Gypsy and Traveller pitches/sites does not have to incorporate adequate landscaping and planting. This could subsequently negatively impact biodiversity on Gypsy and Traveller pitches and sites. However, Policy G13 Biodiversity may mitigate the impacts of development on biodiversity loss. Therefore, an uncertain effect is identified.		Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within Policy G13 Biodiversity in regards to the protection and enhancement of biodiversity at Gypsy and Traveller sites/pitches.						
	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																
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown	Conserve and/or enhance heritage assets, historic environment, and their settings?	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.								
	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															

archaeological sites) and their settings and where appropriate improve the quality of the built environment	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	Low	Medium/Long	Localised	Permanent/Irreversible	Minor Negative	The alternative does not support the achievement of objective IIA12 as a lack of policy may mean that new and replacement accommodation does not have to make adequate provision for the character of the area, including visual and amenity considerations. Therefore, a potential minor negative effect is recorded.	Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within Policy GR1 High Quality Design in regards to the protection and enhancement of character at Gypsy and Traveller sites/pitches.		
	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	Long (20+yrs)	N/A	N/A	Neutral	The alternative 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	N/A	Neutral	The alternative 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**

IIA3: The alternative policy indicates that Watling Farm sites has capacity to accommodate any future additional needs, if they arise, due to a 1974 permission for 15 pitches. However, a lack of policy would mean that proposals for new and replacement accommodation managed via the London Plan and National Planning Policy, may not be guided towards areas with reasonable access to public transport, in order to easily access community facilities and services. Therefore, an uncertain effect is recorded.

IIA4: The alternative does not support the achievement of objective IIA4 as a lack of policy would mean that new and replacement accommodation may not be located in areas with reasonable access to public transport, in order to easily access community facilities and services. Additionally, proposals for new and replacement accommodation managed via the London Plan and National Planning Policy may not make adequate provision for amenity space and play areas for residents, or make provision for safe and acceptable living environments. Therefore, a potential significant negative effect is recorded.

IIA6: A lack of policy may mean that new and replacement accommodation is not located in areas with reasonable access to public transport, in order to easily access community facilities and services. Therefore, due to uncertainty surrounding where new and replacement provision would be provided under his alternative, an uncertain effect is identified.

IIA10: A lack of policy may mean that new and replacement accommodation for Gypsy and Traveller pitches/sites does not have to incorporate adequate landscaping and planting. This could subsequently negatively impact biodiversity on Gypsy and Traveller pitches and sites. However, Policy GI3 Biodiversity may mitigate the impacts of development on biodiversity loss. Therefore, an uncertain effect is identified.

**Significant Positive Effects**

**Potential Cumulative Effects Identified**

**Mitigation**

IIA3: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.  
 IIA4: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, facilities to be provided and their preferred location.  
 IIA5: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.  
 IIA6: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within the housing policies in regards to the provision of sites and pitches for Gypsies and Travellers, and their preferred location.  
 IIA10: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within Policy GI3 Biodiversity in regards to the protection and enhancement of biodiversity at Gypsy and Traveller sites/pitches.  
 IIA12: Mitigation: The inclusion of a Gypsy and Traveller Needs policy, or specific guidance within Policy GR1 High Quality Design in regards to the protection and enhancement of character at Gypsy and Traveller sites/pitches.

**Enhancements**

Policy/Alternative name	HO12 Gypsy and Traveller Accommodation Needs: Alternative 2
Chapter	Chapter 04: Meeting Harrow's Housing Needs
Policy/alternative description	This alternative is for a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015). Based on this definition, the West London Alliance GTANA (2018) identified no need to provide additional pitches during the period between 2016 -2033/41.
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 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											
IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough	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	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.				
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	Medium/L ong	Localised	Permanent/Irreversible	Significant Negative	The alternative does not support the achievement of objective IIA3. The alternative policy does not aim to provide three additional pitches at the existing Gypsy and Traveller site at Watling Farm (0.5ha), due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). This definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative, creating equality and inclusivity issues. Therefore, a potential significant negative effect is recorded.		Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site, in order to provide for the needs of the Gypsy and Traveller community.		
	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											
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	Localised	Permanent/Irreversible	Significant Negative	The alternative does not support the achievement of objective IIA4. The alternative policy does not aim to provide three additional pitches at the existing Gypsy and Traveller site at Watling Farm (0.5ha), due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). This definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative, creating health and wellbeing issues. Therefore, a potential significant negative effect is recorded.		Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site, in order to provide for the needs of the whole Gypsy and Traveller community.		
	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?	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	Localised	Permanent/Irreversible	Significant Negative	Proposals for new Gypsy and Traveller sites and pitches should contribute to meeting identified local housing needs. However, the alternative policy does not envisage that additional sites will be required during the plan period, due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). Additionally, this definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health and age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative. Therefore, a potential significant negative effect is recorded.		Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site.		
	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?	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/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative 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.				
	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 alternative 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 alternative 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	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative 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 deciding 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.			
	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/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative highlights that proposals for new and replacement accommodation must incorporate adequate landscaping and planting, which may provide benefits for biodiversity in the area. The alternative 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										
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	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	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.			
	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										
IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	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	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative 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										
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?	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/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative highlights that proposals for new and replacement accommodation must make adequate provision for basic amenities such as running water and sewerage. The alternative 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										
IIA14 Waste: To minimise waste.	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										
	Encourage new developments to provide adequate space for waste separation?	Yes	Direct	Low	Medium/L ong	Localised	Permanent/Irreversible	Minor Positive	The alternative 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										

Significant Negative and Uncertain Effects

IIA3: The alternative does not support the achievement of objective IIA3. The alternative policy does not aim to provide three additional pitches at the existing Gypsy and Traveller site at Watling Farm (0.5ha), due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). This definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative, creating equality and inclusivity issues. Therefore, a potential significant negative effect is recorded.

IIA4: The alternative does not support the achievement of objective IIA4. The alternative policy does not aim to provide three additional pitches at the existing Gypsy and Traveller site at Watling Farm (0.5ha), due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). This definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative, creating health and wellbeing issues. Therefore, a potential significant negative effect is recorded.

IIA5: Proposals for new Gypsy and Traveller sites and pitches should contribute to meeting identified local housing needs. However, the alternative policy does not envisage that additional sites will be required during the plan period, due to no identified need based on the Gypsy and Traveller definition included within the PPTS (2015). Additionally, this definition excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health and age reasons. As a result, the future housing needs of gypsies and travellers such as these are not being provided for within this alternative. Therefore, a potential significant negative effect is recorded.

Significant Positive Effects

Potential Cumulative Effects Identified

Mitigation

IIA3: Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site, in order to provide for the needs of the Gypsy and Traveller community.  
 IIA4: Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site, in order to provide for the needs of the whole Gypsy and Traveller community.  
 IIA5: Mitigation: add provision for the development of Gypsy and Traveller pitches at the existing Watling Farm site.

Enhancements

Policy/Alternative name	LE1 Development Principles and Town Centre Hierarchy: Alternative 1
Chapter	Chapter 05: Local Economy
Policy/alternative description	This alternative is for a less restrictive policy which would be not seek to control or protect main town centre uses.
Assumptions Made	None.
Disclaimer	Alternative 1 has the same IIA Objectives scores for IIA2-14 due to immaterial differences in the policy text. Please see LE1 Development Principles regarding details of scores for these objectives. Explanation for alternative can be found below.

Alternative	Description	Assessment		Mitigation Enhancements
		Potential for cumulative effects?	Mitigation/Enhancement	
LE1 Development Principles and Town Centre Hierarchy: Alternative 1	The major difference between Alternative 1 and the preferred policy option is that the less restrictive alternative would not control or protect main town centre uses, which may impact on the vitality and vibrancy of town centres. This would change the score of IIA1 to minor positive, as opposed to significant positive (as the preferred option scores).			



Conserve and/or enhance heritage assets, historic environment, and their settings?  
 Maintain and enhance access to cultural heritage assets?  
 Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?  
 Contribute to the better management of heritage assets and contribute to conserving heritage at risk?  
 Improve the condition of the historic environment?


Policy/Alternative name	LE3 Industrial Land: Alternative 1
Chapter	Chapter 05: Local Economy
Policy/alternative description	This alternative allows for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites.
Assumptions Made	Development is in accordance with policies relating to matters and other relevant Development Plan Policies.
Disclaimer	Alternative 1 has the same IIA Objectives scores for IIA1-14 due to immaterial differences in the policy text. Please see LE3 Industrial Land regarding details of scores for these objectives. Explanation for alternative can be found below.

Assessment			
Alternative	Description	Potential for cumulative effects?	Mitigation/Enhancement
LE3 Industrial Land: Alternative 1	The major difference between Alternative 1 and the preferred policy option is that Alternative 1 allows for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites. Although this may be economically beneficial, this could mean industrial uses that could occur elsewhere in the borough without having adverse impacts would instead occur on the borough's limited amount of industrial land. However, both requirements will result in a minor positive result for IIA objective 1 (economy) due to the overall contents of the policy. Overall, Alternative 1 performs the same as the preferred policy LE3 Industrial Land.		

Conserve and/or enhance heritage assets, historic environment, and their settings?
Maintain and enhance access to cultural heritage assets?
Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?
Contribute to the better management of heritage assets and contribute to conserving heritage at risk?
Improve the condition of the historic environment?




Policy/Alternative name	LE3 Industrial Land: Alternative 2
Chapter	Chapter 05: Local Economy
Policy/alternative description	This alternative allows for co-location of housing on Local Strategic Industrial Sites.
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	N/A	N/A	N/A	N/A	N/A	Uncertain	The alternative 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. However, allowing for the co-location of housing may reduce the already limited floorspace for industrial use. The impact this may have on the economy is therefore dependant on where the housing is located, the magnitude of impact this may have on industrial floorspace, and the types of industry impacted. Therefore, a potential uncertain effect is recorded.		Mitigation: Ensure protection from housing development is given to the industries that the Borough relies on the most, in order to minimise the impact co-location of housing may have on the economy.					
	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. 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/quality 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	Direct	Low	Medium/Long	Borough Wide	Permanent/Irreversible	Minor Positive					The policy supports the achievement of objective IIA6 as it supports the co-location of housing on Local Strategic Industrial Sites. This will help to deliver housing to meet wider development plan objectives. Therefore, due to the support provided from this policy for the provision of housing, 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														
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														
	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	Low	Medium/Long	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.							
	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 though 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)?	Yes	Indirect	Low	Medium/Long	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 minor positive effect is recorded.							
	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 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														



Policy/Alternative name	G12 Open Space: Alternative 1
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	This alternative is for a more restrictive policy option to be implemented, that does not allow for community infrastructure to be developed on Open Space in exceptional circumstances.
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 ageing 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	Medium	Medium/Long	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	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?	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?	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	N/A	N/A	N/A	N/A	N/A	N/A	Minor Positive	The policy supports the achievement of objective IIA10 as it 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. 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, heritage assets (including known and unknown archaeological sites) and their settings and where	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														

appropriate improve the quality of the built environment	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

Policy/Alternative name	GI3 Biodiversity: Alternative 1
Chapter	Chapter 07: Green Infrastructure
Policy/alternative description	This alternative is for a more relaxed policy option to be implemented, with all major and minor development proposals being supported by a minimum 10% Biodiversity Net-Gain.
Assumptions Made	None.
Disclaimer	Alternative 1 has the same IIA Objectives scores for IIA1-14 due to immaterial differences in the policy text. Please see GI3 Biodiversity regarding details of scores for these objectives. Explanation for alternative can be found below.

Assessment			
Alternative	Description	Potential for cumulative effects?	Mitigation/Enhancement
GI3 Biodiversity: Alternative 1	The major difference between Alternative 1 and the preferred policy option is that Alternative 1 requires a minimum of 10% biodiversity net gain for developments, where as the preferred option requires a minimum of 20%. Both requirements will result in a significant positive result for IIA objective 10 (biodiversity) due to the overall contents of the policy. Alternative 1 is unlikely to benefit biodiversity to the same extent as the preferred option policy however.		

Conserve and/or enhance heritage assets, historic environment, and their settings?
Maintain and enhance access to cultural heritage assets?
Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?
Contribute to the better management of heritage assets and contribute to conserving heritage at risk?
Improve the condition of the historic environment?


Policy/Alternative name	Policy CN1 Sustainable Design and Retrofitting: Alternative 1
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	Alternative 1: Development size threshold (focusses on major applications / development proposals, (i.e. 10+ units) or the small site threshold (sites less than 0.25 ha in size).
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	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' BREEAM 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: 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	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?	Yes	Indirect	Medium	Long (20+ yrs)	borough Wide	Permanent/Irreversible	Minor Positive	The alternative supports the delivery of housing developments, and may potentially support the delivery of smaller sites by placing fewer requirements on them for sustainable design. A potential minor positive effect is therefore 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?	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?		N/A	N/A	N/A	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, Solar PV on top of new development to regenerate renewable energy.											
	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 Energy: To support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)? Support the shift towards usage of electric and ultralow emissions vehicles? Promote a low carbon local economy? Ensure new developments are energy efficient?	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 negative	The alternative 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 alternative only focusses on major development proposals, however, i.e. those with greater than 10 units, or sites less than 0.25 hectares. The proportion of development coming	Yes													
	Support the shift towards usage of electric and ultralow emissions vehicles?	No																					
	Promote a low carbon local economy?	Yes																					
	Ensure new developments are energy efficient?	Yes																					



IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	Minimise greenhouse gas emissions?	Yes								forward on small sites within the Borough is likely to be quite significant given the nature of the Borough and the London Plan targets. This would likely undermine the intent for all buildings to meet net zero, and therefore would have a lesser effect on carbon reduction than Policy CN1. It would also mean that many buildings within the suburban area would not be required to achieve net zero design, which would be a missed opportunity to minimise carbon emissions and future proof the boroughs buildings. As such, although the alternative supports the delivery of low carbon energy capacity in line with the London Plan (2021) and helps achieve the Councils Net Zero aspirations by 2030, it does not meet the requirements that all new buildings in Harrow are required to be Net Zero. As such, a potential significant negative effect has been identified.			
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 in larger developments 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											
IIA10 Biodiversity: To safeguard and enhance biodiversity and good diversity and improve connectivity between, and access to, green spaces and functional habitats.	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	Indirect	Medium	Long (20+ yrs)	Borough Wide	Permanent/Reversible	Minor Positive	The policy highlights that proposals in larger developments 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			
	Avoid adverse effects on European designated habitats sites?	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												
IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	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. As such, a minor potential positive effect has been recorded.	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?	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	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			
	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?	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**

IIA8: The alternative 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 alternative only focusses on major development proposals, however, i.e. those with greater than 10 units, or sites less than 0.25 hectares. The proportion of development coming forward on small sites within the Borough is likely to be quite significant given the nature of the Borough and the London Plan targets. This would likely undermine the intent for all buildings to meet net zero, and therefore would have a lesser effect on carbon reduction than Policy CN1. It would also mean that many buildings within the suburban area would not be required to achieve net zero design, which would be a missed opportunity to minimise carbon emissions and future proof the boroughs buildings. As such, although the alternative supports the delivery of low carbon energy capacity in line with the London Plan (2021) and helps achieve the Councils Net Zero aspirations by 2030, it does not meet the requirements that all new buildings in Harrow are required to be Net Zero. As such, a potential significant negative effect has been identified.

**Significant Positive Effects**

**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, Solar PV on top of new development to regenerate renewable energy.

Policy/Alternative name	Policy CN1 Sustainable Design and Retrofitting: Alternative 2
Chapter	Chapter 08: Responding to the Climate and Nature Emergency
Policy/alternative description	Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations
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: 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																					
	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?	No											N/A	N/A	N/A	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, Solar PV on top of new development to regenerate renewable energy.
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	Minor Positive	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. This will 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, however, this alternative option utilises the definition and measure of 'Net Zero/Carbon' from Part L of Buildings Regulations, which only considers 'regulated' carbon emissions as opposed to all energy uses. This could lead to missed emissions that are being released through items such as equipment and appliances. This alternative also sets targets via a percentage carbon reduction, as opposed to absolute targets in Policy CN1, which are considered more robust, verifiable, and comparable. The policy suggests that percentage reduction targets relative to the Building Regulations part L baseline is less tangible and harder to verify once a building is complete and in usage, which will make it harder to achieve IIA8. As such, the effect of the alternative has been determined as a potential minor positive effect.	Yes													
	Support the shift towards usage of electric and ultralow 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	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																					

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											
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	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												
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 and where appropriate improve the quality of the built environment	Conserve and/or enhance heritage assets, historic environment, and their settings?	Yes	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. As such, a minor potential positive effect has been recorded.	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?	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	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			
	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?	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

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, Solar PV on top of new development to regenerate renewable energy.