



LONDON BOROUGH OF  
**HARROW**

**Harrow Biodiversity Net Gain Draft Working Paper:  
November 2024 (updated)**

## Purpose of this Paper

The purpose of this revised draft working paper is to set out the policy approach proposed to be taken forward by the London Borough of Harrow in relation to Biodiversity Net Gain (BNG). Specifically, it sets out the basis for the rationale to seek 15% BNG rather than to apply the 10% BNG as set out within the Environment Act 2021.

This working paper remains a draft report, and the Council will seek to undertake more evidence base on this matter, with the intention that this will be published prior to the Regulation 22 (submission) stage of the Local Plan preparation process. The paper has in the interim been updated since the first round of consultation ('Regulation 18') on the draft new Harrow Local Plan 2021-2024 – Initial Proposals, which was held over February-April 2024. Key amendments relate to the reduction of the proposed BNG target from the 20% proposed in the Initial Proposals, to 15% in the Proposed Submission version of the Plan, which will be consulted on in November-December 2024 ('Regulation 19') consultation.

This paper seeks to address three key considerations in the justification of the 15% target, having regard to:

- (a) local need for a higher percentage,
- (b) local opportunities for a higher percentage; and
- (c) any impacts on viability for development.

Consideration is also given to how the policy will be implemented.

Initial background to BNG and the draft Harrow Local Plan 2021-2041 is provided in the first instance.

## Background – BNG and the 10% requirement

### **Environment Act 2021**

As part of the 2021 Environment Act, the Biodiversity Duty on all public bodies was strengthened with additional requirements being placed on local authorities. The Act also introduced the 47 Local Nature Recovery Strategy areas covering all of England, supporting a national Nature Recovery Network and, other than where exceptions apply, requiring a mandatory biodiversity net gain as part of the planning system.

The Act, and the various pieces of secondary legislation which implement it, set a minimum gain of 10% in terms of a net increase, as determined with the statutory Biodiversity Metric or Small Sites Metric as appropriate, but made provision for local authorities to set a higher figure, reflecting the comments on the ten per cent figure and the evidence supporting it during public consultation.

The BNG become mandatory for large sites on 12<sup>th</sup> February 2024, with mandatory application to small sites in April 2024.

### **National Planning Policy Framework (2023)**

Paragraph 185 of the National Planning Policy Framework states, to protect and enhance biodiversity and geodiversity, plans should among other things identify and pursue opportunities for securing measurable net gains for biodiversity. Planning authorities and neighbourhood planning bodies when preparing new policies in line with paragraph 185 will want to take account of the statutory framework for biodiversity net gain.

## **National Planning Policy Guidance 2024**

It is noted that 14<sup>th</sup> February 2024 the Department for Levelling Up, Housing and Communities (DLUHC) published revised guidance in relation to how plan makers should address the level of BNG within a local plan. Specifically, it states;

*'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented'*

This places greater emphasis on the need to be able justify and evidence any local plan policies seeking more than the statutory 10% and this draft working paper sets out the beginning of the evidence base required to justify why the London Borough of Harrow considers that a 10% BNG is not sufficient and therefore is pursuing a higher BNG level within its draft Local Plan, namely 15%.

### **London Plan 2021**

The London Plan (2021) provides support for biodiversity primarily through 'Policy G6 Biodiversity and access to nature'. This policy supports the protection and enhancement of designated and non-designated sites for nature and species. It also sets out that 'development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain' and 'proposals which reduce deficiencies in access to nature should be considered positively.'

In addition, Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design, introducing the Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. There is guidance in the Mayor's Urban Greening LPG (2023) and Urban Greening for Biodiversity Net Gain: A Design Guide. Whilst this is a similar GI topic, the UGF and BNG are complementary but distinctly different and not interchangeable.

### **Harrow Biodiversity Action Plan**

Harrow's current BAP moves on from its previous iterations towards the growing recognition of the need for local action and policy implementation to support nature's recovery in response to the global climate and nature crises, giving emphasis to better connected, more resilient nature networks. It highlights the value of Harrow's important sites, habitats and species, the benefits they provide and the risks of loss - as well as the dichotomy between Harrow's built environment and its green belt areas. It highlights the importance of and relationship between land management, spatial planning policy and resources. The limited extent to which it has been possible to achieve its identified actions, emphasises the need for and importance of robust mechanisms to minimise development and other impacts, and to secure adequate resources and target these to better outcomes for biodiversity and local communities.

### **[Harrow Local Plan 2021-2041](#)**

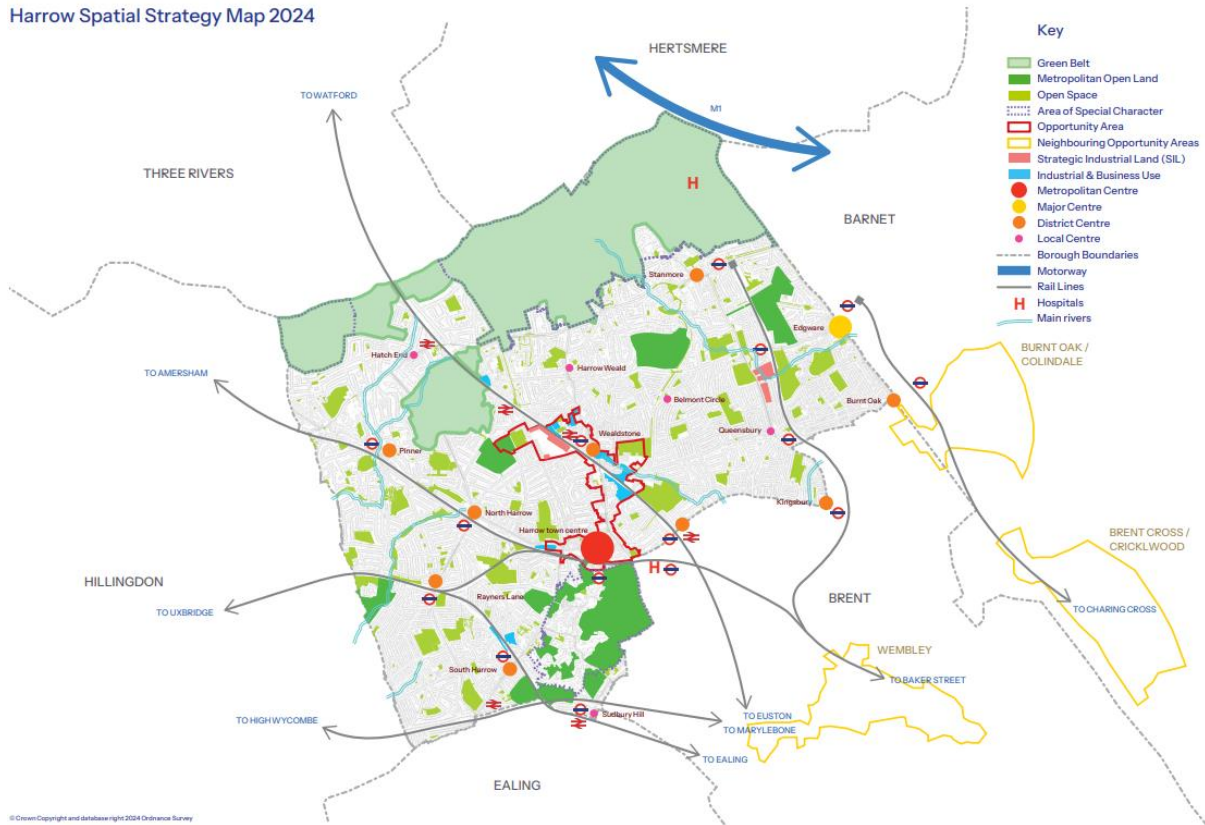
#### **Proposed Spatial Strategy**

The New Harrow Local Plan 2021-2041 Proposed Submission (Regulation 19) version outlines the proposed spatial strategy for new development in the borough during the plan period. Most new development in the borough is anticipated to be housing, given the predominately suburban nature

of the borough and low employment (office / industrial) base. In terms of housing, the spatial strategy can be summarised as follows:

- 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22 – 2040/41)
- 2 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations:
  - A. Harrow and Wealdstone Opportunity Area: A minimum of 8,750 will be delivered through extant permissions and on allocated sites within the opportunity area.
  - B. Rest of the Borough: A minimum of 3,165 will be delivered through extant permissions and on allocated sites across the rest of the Borough.
  - C. Small Sites: A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or a Metropolitan, Major, District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.
  - D. Windfall sites: Development of new housing on suitable sites (above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.

The overall spatial strategy is shown in Map 1 below:



Map 1: Draft Spatial Strategy Map – Harrow Local Plan 2021-2041

### The Harrow Context: What is being sought

This revised draft working paper outlines the basis for the approach the London Borough of Harrow seeks to take in relation to BNG within its new Local Plan, which will cover the period from 2019 – 2041. Harrow is seeking to implement the following:

- (1) **an uplift of at least 15%** in terms of biodiversity units; or
- (2) provide a **pro rata minimum, equivalent to two biodiversity units per hectare** (whichever is the greater).

Whilst the Council has a successful history of securing 20% BNG on schemes previously and this target was included in the ‘Initial Proposals’ Local Plan (February 2024), following consultation over February-April 2024 it is proposed that the figure is revised to 15%. This amendment acknowledges concerns expressed about the originally proposed 20% level but still responds to the local evidence that indicates that given local circumstances, the mandatory 10% is insufficient given the lower baseline starting point relative to the wider national context in which the 10% was set.

### Local justification for a higher target

The mandatory 10% BNG requirement is set at a national level; there is however clearly a discernible difference in the level of development and biodiversity across the borough. Appendix 1 sets out in detail the characteristics of Harrow with respect to development, biodiversity and other green infrastructure matters relative to other parts of the country and within the borough itself.

From Appendix 1, the following becomes evident that:

- (a) Harrow is a predominantly developed area, characterised by large areas of urban and suburban development (Map 2). The borough’s average population density is 5,176 persons per sq. km

(51.76 per hectare) compared to a national average of 438 persons per sq. km<sup>1</sup>. Within the borough itself, densities range from 18.62 persons per hectare in Stanmore ward up to 109.86 persons per hectare in Wealdstone North ward (Table 1). Neighbouring Hertfordshire has a density of 730 persons per sq. km (Table 2).

- (b) Natural cover varies widely across the borough (Table 1), ranging from 5.18% in Edgware Ward, through to 59.70% in Stanmore Ward, with the average across the borough being 35.21%. Wards likely to see the most development over the Plan period (Greenhill, Marlborough and Wealdstone South) have low / below average levels of natural cover (8.95%, 4.79% and 18.26% respectively).
- (c) Open space in the borough is predominantly located in the north of the borough, with lower levels of provision in the south of the borough (Map 3). This has significant biodiversity implications as open space provision is a key determinant of the number, extent and degree of connectivity of green spaces and, by extension of the areas that either have relatively high value wildlife or offer greatest strategic potential. It also means that development and population growth in the Harrow and Wealdstone Opportunity Areas will place greater pressure on the limited public and private open space.
- (d) Compared to other London boroughs, Harrow ranks relatively poorly with respect to the number and extent of Sites of Importance for Nature Conservation (SINC) (Table 3 and Map 4).
- (e) Similarly, those parts of the borough likely to experience the most development (Greenhill, Marlborough and Wealdstone South wards) also fall within areas with a deficiency in access to nature (Map 5).

Biodiversity provision in Harrow is therefore poor compared to the national and regional averages and within the borough, those areas expected to experience the highest levels of development are also those areas with more limited natural cover within the borough. Harrow is therefore starting from a very low baseline compared to the national context on which the mandatory 10% was set. To contribute to the national biodiversity objectives and to address deficiencies within Harrow, a higher target is necessary and warranted.

#### Local opportunities for a higher percentage

Harrow Council has been seeking biodiversity net gain on major developments in the borough based on its current Local Plan (adopted 2012 and 2013), specifically under Policy DM 20: Protection of Biodiversity and Access to Nature. In the context of the emerging mandatory 10% requirement in the then Environment Bill (first reading January 2020) and the local circumstances (outlined above), the Council has been seeking net gain more than 10% since at least then and have been able to secure up to 20% on a number of larger developments.

Appendix 2 identifies the significant potential within the borough for providing biodiversity offsetting should 20% not be achieved at a specific development site. It also addresses deliverability of BNG generally.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2022>

## Impacts on viability for development

The London Borough of Harrow has had a successful track record for securing BNG under the current Harrow Local Plan, however to date these have been on a case-by-case basis only, and subject to scheme specific viability testing.

The draft new local plan formally seeks to achieve a BNG of 15%, however this must be achievable from a viability perspective. The draft new local plan must be viability tested as per the National Planning Policy Framework (NPPF) paragraph 34 which states that “Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

A Plan-level Viability Assessment was completed in October 2024, ahead of Regulation 19 consultation. The assessment indicates:

emerging policies GI3 and GI4 require that developments achieve urban greening factor of 0.4 on residential elements and 0.3 on non-residential elements and a 15% biodiversity net gain. We have tested the impact of the Council’s emerging policies in relation to these requirements and they have a relatively modest impact on residual land values and can therefore be viably absorbed.

This conclusion is consistent with the Impact Assessment<sup>2</sup> prepared by Government prior to the introduction of BNG, which found that:

net gain delivery costs are likely to be low as a proportion of key variables such as build costs and land prices. In addition, it is unlikely to lead to a significant increase on existing average developers contributions.

Paragraph 6.11.2 of the IA also notes with respect to costs to the developers:

varying the level of net gain between 5% and 20% has very limited impact on the outcome, there is a trade-off between cost implications for developers and the likelihood of net gain being delivered at a national level (e.g. less costly/likely at 5% net gain compared to 10%, and vice versa for 20%).

Given the depleted biodiversity in Harrow and the fact most of the development proposed in the draft Local Plan will occur on brownfield sites in areas of lowest biodiversity, a minimum net gain above the mandatory 10% requirement achieves an appropriate balance between cost implications and achievement of a meaningful net gain in the borough.

Consequently the 15% BNG requirement is considered viable; this addresses concerns raised by the development industry at Regulation 18 consultation earlier in 2024.

## How the policy will be implemented

### **Deliverability**

Harrow Council owns significant areas of land and has already earmarked some of these as **habitat banks**, in the Green Belt and in more urban areas. Such sites have scope to meet BNG offsetting needs in the borough for many years, whilst furthering the London LNRS and enhancing the borough’s natural

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<sup>2</sup> <https://assets.publishing.service.gov.uk/media/5da5d695ed915d17b4f13f63/net-gain-ia.pdf>, page 46

capital. The Council will also seek to work with private landowners where there are suitable, strategic opportunities.

This would not impact on land supply for housing or other purposes and would contribute to the value of ecosystem services that would benefit existing and future residents of Harrow and West London.

### **Targeting**

Where gain could not usefully be delivered on site, beyond what might be required to achieve Urban Greening Factor (UGF) requirements under the London Plan, it would ideally be directed towards either Harrow's part of the London Local Nature Recovery Strategy (LNRS) or to addressing local deficiencies in natural capital provision and access to nature. This would be guided by the information in Appendices 1 and 2, initially, and increasingly informed by additional survey information, baseline assessments and local wildlife recording.

The Council will explore the use of Section 106 obligations and Community Infrastructure Levy (CIL) in delivering the above through either on-site provision or through off-site obligations (including towards maintenance). The Council has already allocated capital funding to establish habitat banks within the borough to deliver any net gain that cannot be achieved on individual development sites. This strategy to improve biodiversity within the borough will be further explored, consistent with the Council's obligations under the Environment Act (which apply regardless of whether or not the Local Plan seeks to exceed the mandatory 10% BNG); that is to say, it is only the additional quantum of potential habitat banks / off-site biodiversity units that maybe required as a result of the proposed 15% BNG policy, rather than the fact these are required in the first place (which they would need to be even with just the 10% minimum requirement) .

### **Summary / Conclusion**

Based on its character as an outer London borough (and primarily suburban in nature), the balance between opportunities, the current state of nature within Harrow in terms of the extent and condition of many of its SINC areas and the need to both foster sustainable development, the application of the national minimum ten per cent gain would be insufficient to address climate and nature challenges, address the lack of access to biodiversity benefits for many residents or address nature's recovery and contribute to the national 30x30 goal.

The identified minima of 2 biodiversity units per hectare or a 15% uplift are considered to be essential to the achieving the goals that Harrow has set for itself, for its future development and regeneration and for its residents but will need to be part of an overall approach.

This draft paper sets out the approach the Council wish to progress through the Local Plan preparation in regard to determining what level of BNG would be most suitable for it. The Council intend to continue to undertake more work in the lead up to the submission (Regulation 22) stage of the plan making process, which will build on the positions set out within this paper.



## Appendix 1 – Local need evidence and justification

### **The London Borough of Harrow: A Metroland Borough**

The London Borough of Harrow is an outer London (as defined in the London Plan (2021)) borough and is well known for its Metroland character.

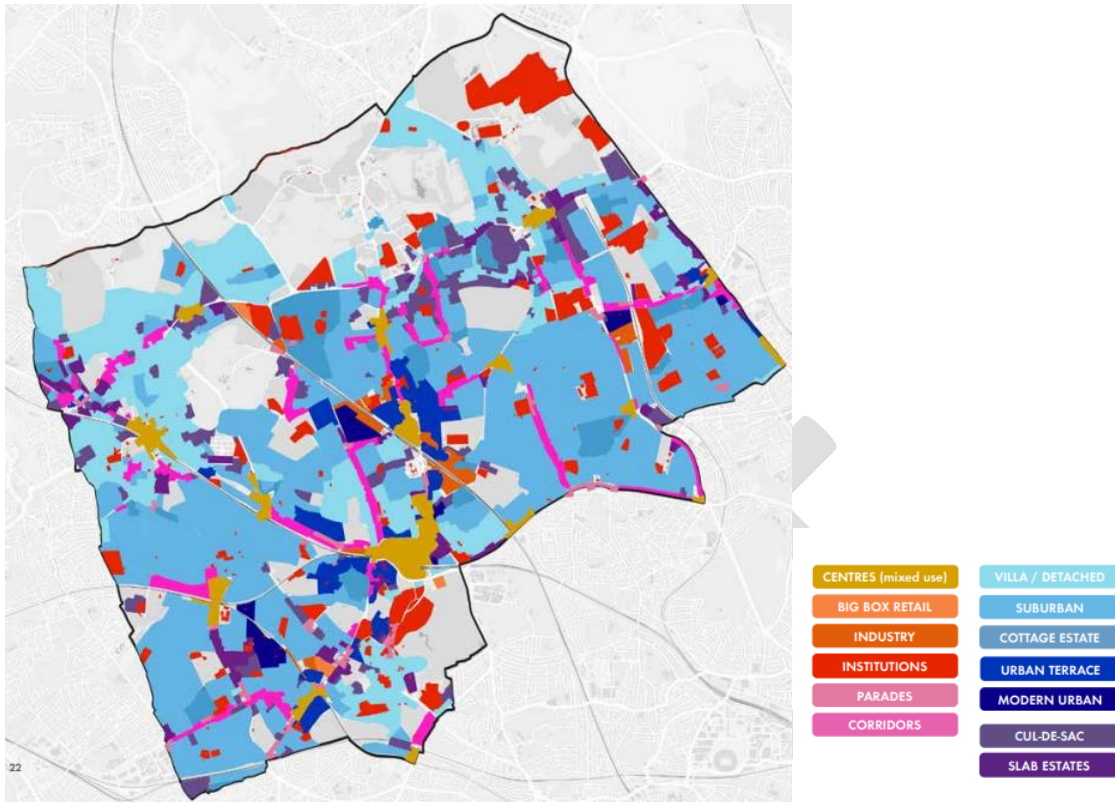
The first railways through the Borough arrived in the late 1830s/40s and sought to serve the existing settlements of Harrow and Pinner on its way between Birmingham and London. The Metropolitan Railway was added in the 1880s/90s which ran through Harrow on its way to Aylesbury and is the route of Metropolitan line today. The Stanmore branch line was built to bring guests to Bentley Priory which was now operating as a hotel. These early railways saw the gentle expansion of these existing places, hinting at the significant transformation that was to come.

By the 1940s the borough had been transformed. Over a period of around 15 years Harrow had shifted from a majority rural landscape to a series of suburban neighbourhoods. This was triggered in large part by the expansion of London's underground network. The extension of the Bakerloo Line (now the Jubilee) to Stanmore and the Piccadilly Line (by 1933) opened up the farmland in these locations to speculative developers.

Almost two-thirds of Harrow's housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as fields became homes, gardens, streets, parades and recreation grounds. This 'metroland' housing continues to be one of the principal characteristics of Harrow's suburbs, particularly to the south east and south west of the borough. Large areas were developed by private developers at various densities and architectural styles - detached, semi-detached and short terraces of homes.

The public sector also developed areas of housing, generally in a cottage estate style with a more austere character and set pieces of green open space. Given the huge scale of the development at this time, looking at Harrow at the borough-wide scale there are not significant differences in the overall pattern of development between the 1940s plan and today. The borough has seen further densification in Harrow and along the A409 as well as development of post-war office blocks and housing estates. The Bakerloo line was extended to Harrow & Wealdstone in 1984 - the borough's 4th tube line - which contributed to the further expansion and densification of this central corridor.

Map 2 below shows the outcome of the rapid development of Harrow, namely that borough that is predominately built upon, with large areas of suburban development, with most of the undeveloped areas being located in the northern part of the borough.



Map 2 Built morphology mapping: Pg 22 Harrow Characterisation & Tall Building Study (2021)

## Harrow's Population

Following on from the physical make-up of the borough, Table 1 below illustrates the amount of natural cover on a ward basis, whilst showing the increase in population over a twenty-year period. It begins to demonstrate that there is an evidential population increase, which often can be linked to new development, which both place added pressure and burden on the biodiversity of the borough.

Table 1: Harrow Population Density and Natural Cover by Ward.

Ward	Area (ha)	Population				Natural Cover
		2001	2011	2021	per ha	
Belmont	185.0514	7,526	8,862	9,021	48.749	7.63%
Canons	200.8896	8,110	9,248	9,735	48.459	30.19%
Centenary	197.8955	10,477	12,842	15,201	76.813	12.03%
Edgware	168.8602	12,124	14,228	15,713	93.053	5.18%
Greenhill	115.7091	5,496	7,592	11,015	95.196	8.95%
Harrow on the Hill	340.775	8,789	10,180	10,786	31.651	52.00%
Harrow Weald	487.9454	12,172	13,693	14,343	29.395	62.44%
Hatch End	288.9291	8,799	9,267	9,822	33.994	40.81%
Headstone	316.606	12,000	13,452	14,882	47.005	35.00%
Kenton East	165.1599	12,143	13,853	13,612	82.417	9.26%
Kenton West	151.7316	9,052	9,820	9,992	65.853	16.84%
Marlborough	127.1067	8,105	10,385	11,990	94.33	4.79%
North Harrow	141.4056	7,218	8,213	8,994	63.604	13.38%
Pinner	420.2667	11,841	12,285	13,137	31.259	39.62%
Pinner South	306.1581	13,854	14,938	15,739	51.408	21.62%
Rayners Lane	112.9946	8,003	9,000	9,143	80.915	16.92%
Roxbourne	109.0207	8,214	8,855	9,905	90.854	20.60%
Roxeth	188.2671	12,498	14,760	15,864	84.263	18.10%
Stanmore	725.1749	9,794	12,436	13,501	18.618	59.70%
Wealdstone North	95.46531	7,526	9,438	10,488	109.86	6.27%
Wealdstone South	83.21835	4,787	6,749	7,957	95.616	18.26%

Ward	Area (ha)	Population				Natural Cover
		2001	2011	2021	per ha	
West Harrow	117.7001	8,287	8,960	10,363	88.046	17.80%
<b>Borough Figures</b>	<b>5,046</b>	<b>206,815</b>	<b>239,056</b>	<b>261,203</b>	<b>51.761</b>	<b>35.21%</b>
				<b>Ward Mean</b>		<b>23.52%</b>
				<b>Ward Median</b>		<b>17.95%</b>

Whilst Harrow wards vary considerably in extent and populace, even the least heavily occupied ward (Stanmore) already has a per km<sup>2</sup> population density (1862, or 18.618 persons per hectare) more than two and a half times the average for Surrey or the immediately adjacent Hertfordshire (Table 2).

### Snapshot comparison with other local authorities

In comparison with counties in Southern England, it should be noted that Harrow's mean population density is significantly higher (even accounting for major cities and former London overspill towns). The Council will seek to further analyse other local authorities as it develops its evidence base.

**Table 2: Comparison of Harrow's Population Density with Some Southern Counties and Guildford.**

Areas for comparison	Area (km2)	Population (2021)	Annual Increase (2011-21)	Population Density /km2	Harrow's population density in comparison
Hertfordshire	1,643	1,198,798	0.72	730	7.07x
Buckinghamshire	1,156	553,078	0.91	353	14.6x
Surrey	1,663	1,203,106	0.61	723	7.2x
Kent	3,544	1,576,069	0.74	445	11.6x
Hampshire	3,679	1,400,899	0.61	381	13.6x
Guildford	271	143,649	0.44	530	9.77x
<b>Harrow</b>	<b>50.48</b>	<b>261,200</b>	<b>0.89</b>	<b>5,176</b>	-

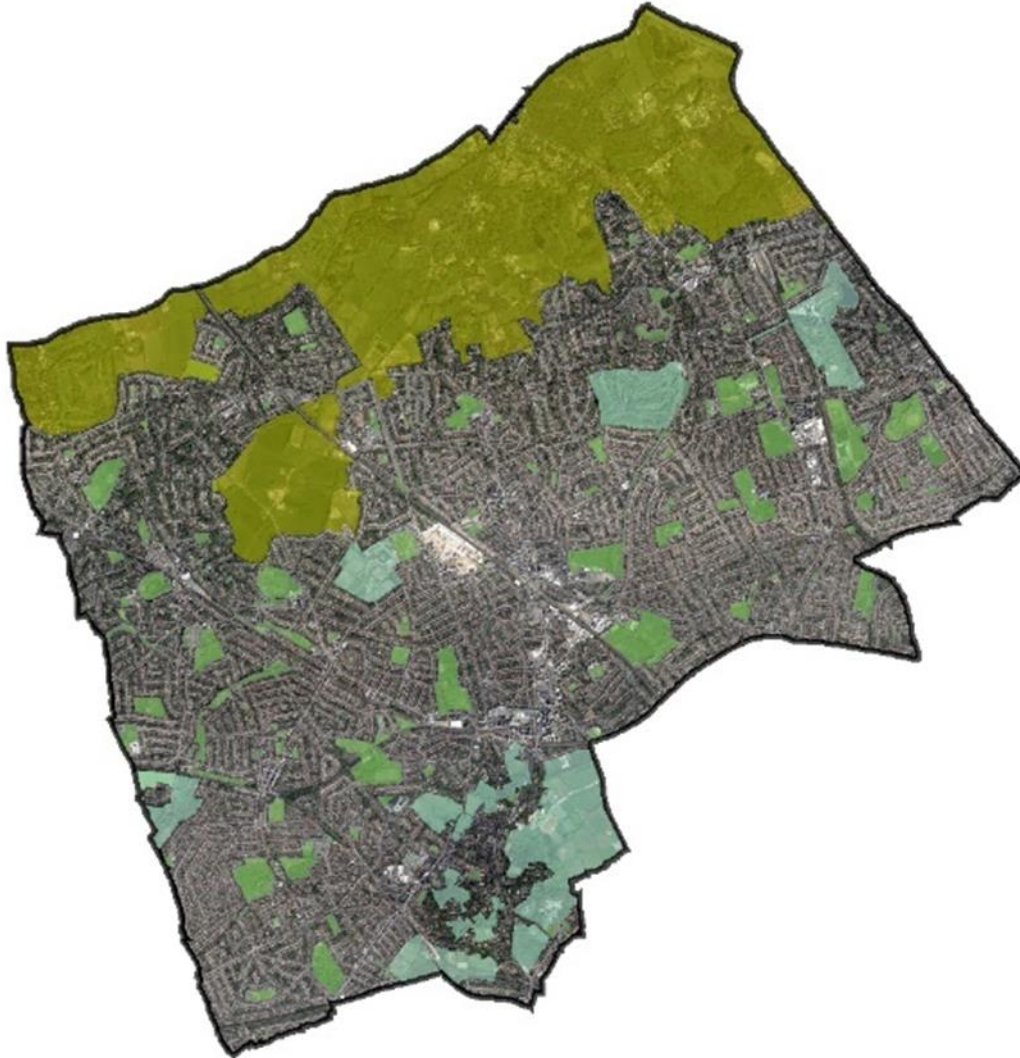
### Open Space Provision

Harrow has a designated Green Belt area of 1088.1ha and 312.31 ha of Metropolitan Open Land. It has some 266 designated open space areas, ranging from less than 220 m<sup>2</sup> to almost 23 ha in size and totalling 368.86 ha (with more than two-fifths less than a quarter hectare) mainly outside the GB/MOL (Map 3). This amounts to just over 1750 ha (34.67%) for the borough as a whole, but notably with significant disparity in provision between wards (Table 1).

Open space provision is a key determinant of the number, extent and degree of connectivity of green spaces and, by extension of the areas that either have relatively high value wildlife or offer greatest strategic potential. Conversely, where most people live is also where they are furthest from having easy access to nature.

This has significant implications for the borough and public services. Amongst these is that a greater area being given over to residential and economic development and supporting infrastructure will mean a reduced area for wildlife and ecosystem service provision, even assuming greater densification and more efficient re-use of low value brownfield sites. The increasing population will place ever greater pressures on a smaller areas of public and private green space of all types. Whilst the value of accessible natural green space in maintaining and improving people's physical, mental and social well-

being is increasingly appreciated, there are limits in carrying capacity above which such value can be permanently degraded, with more sensitive and ecologically restricted species and habitats unlikely to thrive where disturbance or management are unsuited to their needs.



**Map 3: Harrow Open Land: Green Belt, MOL and Open Spaces**

### **Designated Conservation Sites**

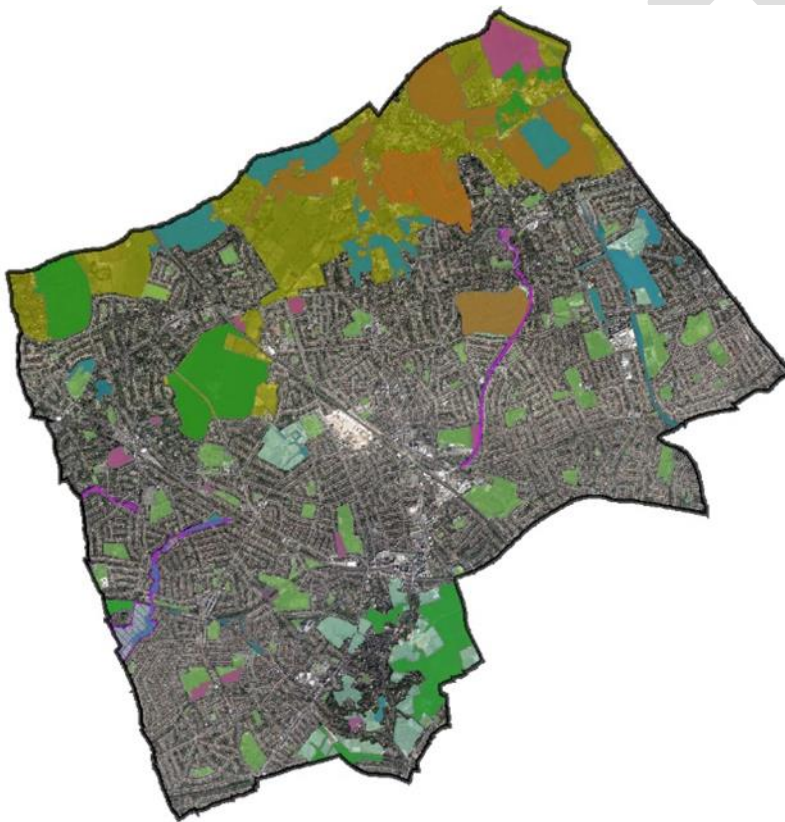
Harrow has one biological Site of Special Scientific Importance (SSSI) (Bentley Priory) and one geological SSSI (on private land near Harrow Weald Common), a former biological SSSI covering Stanmore and Harrow Weald Commons having been de-notified in the late Seventies as a result of changed criteria and site decline.

Harrow presently has 43 Sites of Importance for Nature Conservation (SINCs) of various sizes from 0.27-97.1 ha (see Table 3). These range from sites (including the SSSI area), of Metropolitan Importance, Borough Importance (Grades 1 and 2) and Local Importance (Map 4). These total 15.9% of the Borough.

**Table 3: Harrow SINC Number, Quality and Extent Source: (Greenspace Information for Greater London)**

SINC Grade	Abbrev	Number	Area	% No	% Area	% Borough
Metropolitan	SMI	5	285.6493	11.63%	35.60%	5.66%
Borough (Grade I)	SB1	6	257.7133	13.95%	32.11%	5.11%
Borough (Grade II)	SB2	14	187.6233	32.56%	23.38%	3.72%
Local	SLI	18	71.49627	41.86%	8.91%	1.42%
<b>Total</b>		<b>43</b>	<b>802.4822</b>			<b>15.90%</b>

This places Harrow 21<sup>st</sup> out of the 33 London LPAs and 11<sup>th</sup> out of the 14 Metropolitan boundary boroughs in terms of SINC proportion.



**Map 4: Distribution of Harrow SINC of Different Grades in Relation to Open Land**

The majority of Harrow's SINC-designated area – notably the largest, most valuable and best-connected sites are within the Green Belt (70.7% by area) and, to a lesser extent, patches of MOL (24.7%) (Map 4). This leaves 16 sites totalling 37.17 ha (4.5%) spread across 72.26% of the Borough.

This pattern of dispersion helps highlight four key points.

- (1) Nature conservation sites within the Green Belt or MOL are likely to be better protected and buffered from development and disturbance impacts than areas elsewhere.
- (2) Patches of non-GB/MOL habitat are likely to be smaller, more isolated and more affected by edge-effect impacts.



storeys, arranged in low density blocks. What is clear within Harrow is that the highest proportion of planning permissions granted are householders, which are seeking extensions to existing dwellings either through mechanisms such as full planning permission (S78 Town & Country Planning Act), Permitted Development or Prior Approval. By reason of this, much of the development undertaken within the borough, where there is a degradation of Biodiversity is through avenues that are exempt from requiring a BNG.

In order to achieve a meaningful BNG within Harrow, specifically to offset the losses by reason of the exempt permissions, there is a greater onus on larger sites to deliver BNG. However, providing an arbitrary 10% in a borough with the character of Harrow (predominantly suburban) is considered to not make up for the losses experienced elsewhere.

As this draft working document progresses, further monitoring detail in relation to past planning permissions across the borough that would be applicable to BNG and also exempt, which will assist in setting out the challenges faced by Harrow by reason of development type.

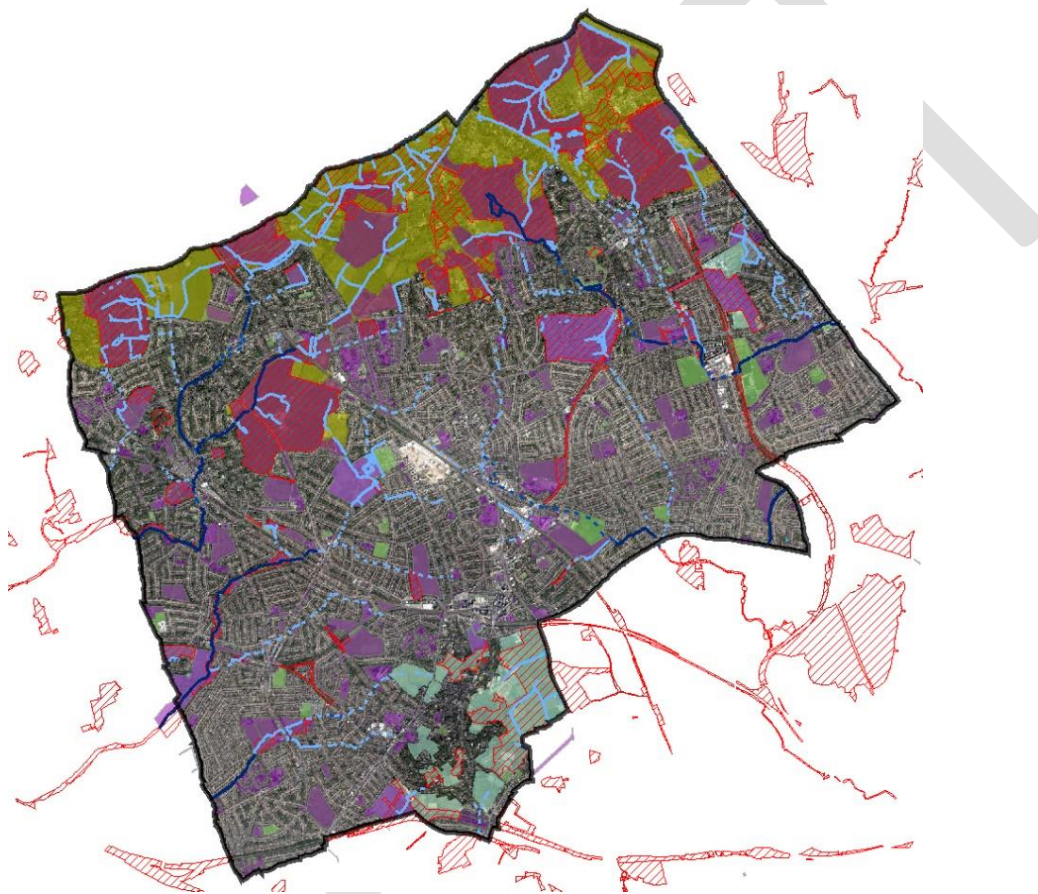
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## Appendix 2 - The basis for a Harrow Nature Recovery Strategy – implementing BNG in Harrow

There is a need for a carefully considered approach to supporting nature's recovery in the short, medium and longer term and how this might be facilitated by and, in turn support an overarching climate and nature strategy for Harrow.

The Council's landholdings have significant potential in relation to enhancing the Borough's natural capital and the benefits it provides, including with regard to support nature's recovery and improving access to nature, with a number of promising candidates within the green belt but also in areas of deficiency. Opportunities in Harrow's streets, verges and highways land also need to be mapped and prioritised.

Consideration should be given to what is around these locations (shown as purple areas) , including in adjacent authority areas (Map 6) and the connectivity, including that provide by waterways (Map 7), between existing SINC's and potential provision enhancement.



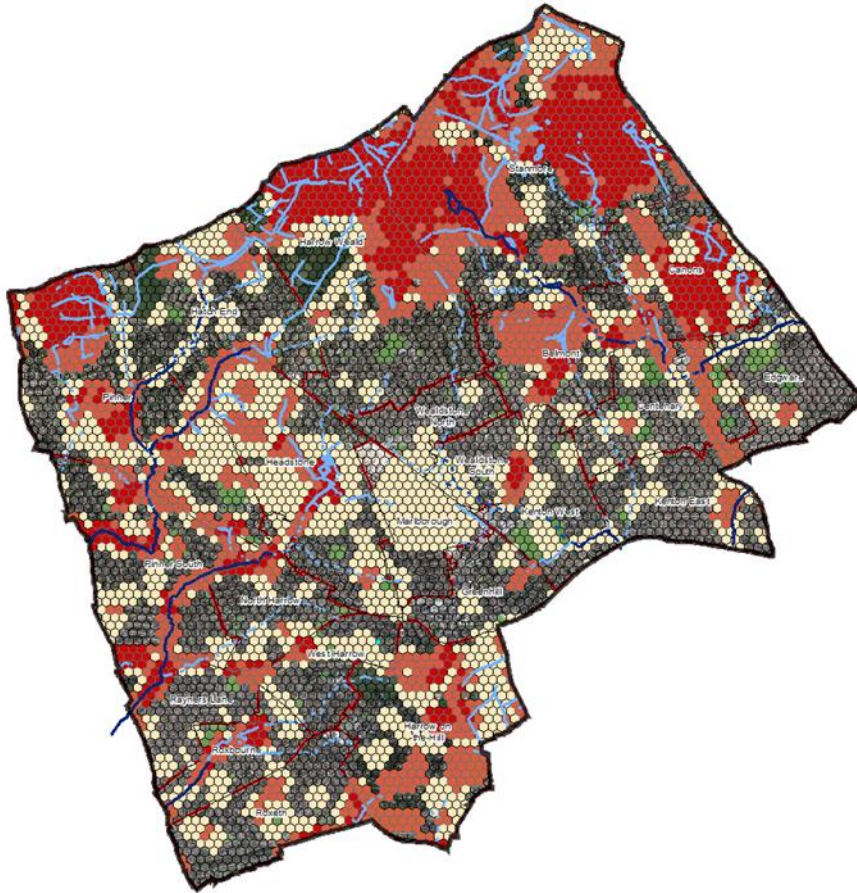
Map 6: Council-owned land in relation to waterbodies and to SINC's in and around Harrow

Greenspace Information for Greater London (GiGL) has used the information which it holds about sites, species and habitats to generate **biodiversity hotspot maps** for London boroughs, partly as a way to flag up where there is likely to be a need to take detailed biodiversity information into account when considering new schemes, e.g. for development and/or nature conservation.

GiGL's hotspots map for Harrow and its margins with neighbouring boroughs further emphasises the importance of the larger, more valuable sites, habitat connectivity and the sizeable area that presently have very limited value (Map 6), as well as highlighting a need for additional wildlife recording.



The hexagons help to highlight areas that are of higher biodiversity interest beyond the largest and most important sites as well as patches and linked areas that should be incorporated into any strategic approach, as well as emphasising the importance of Harrow's waterways in connection with this.



**Map 7: Relative importance (0-3) of land for biodiversity in Harrow, highlighting waterways (based on GiGL data 2023)**

A spatial strategy for nature recovery and protection in Harrow will need to;

- guide development away from strategically important areas of high existing or potential value (informing the local green infrastructure strategy and local development plan and the policies supporting these);
- highlight where interventions and enhancements should be targeted;
- identify how the strategy will be delivered and resourced.

Alongside this, areas that are currently of low existing value but have significant strategic potential in relation to the LNRS and the stacking of other benefits would be prime targets as BNG offsetting locations in relation to securing biodiversity net gain in relation to new development, where gain obligations cannot be (wholly) met on site.