



London Borough of Harrow Council Local Plan

Integrated Impact Assessment – Main Modifications Non-Technical Summary

London Borough Harrow Council

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SLR Project No.: 430.000059.00001/C0410

7 November 2025

Revision: 7

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	3 October 2024	LJ/IT/VP	JM/VP	JM
2	4 October 2024	LJ/IT	VP	VP
3	28 October 2024	LJ	VP	VP
4 formatting errors amended	21 May 2025	VP	VP	JM
5 formatting errors amended	24 June 2025	VP	VP	JM
6 – draft updated to reflect main mods	4 November 2025	Various	KH	VP
7 – final updated to reflect main mods	7 November 2025	Various	KH	VP

Basis of Report

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1.0 Introduction

1.1 This Report

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

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

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

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

HRA follows a slightly different process compared to the other assessments listed above and is driven by specific legislation. The HRA of the Local Plan is summarised within the IIA Report and the HRA Report forms Appendix G of the main IIA Report.

This NTS is a summary of the fourth output of the IIA. The first output was a Scoping Report, the second was the IIA Report published alongside the Regulation 18 version of

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



the draft Local Plan and the third was the IIA Report which accompanied the Regulation 19 version of the draft Local Plan. The fourth output is the updated IIA Report which reflects the main modifications proposed to the new Local Plan following the Examination in Public hearings which took place between June and October 2025. All reports are available here: <https://www.harrow.gov.uk/planning-developments/local-plan-examination>

1.2 How to Comment

The consultation period will be six weeks from 10th November until 23rd December 2025, during which this document will be shared with Statutory Consultees and be available online for public comment. Your views on this IIA Report are welcomed.

How to comment:

**PLEASE PROVIDE RESPONSES BY 12:01 PM, 23RD DECEMBER 2024 TO THE
PLANNING POLICY TEAM via the email address below:**

LOCALPLAN@HARROW.GOV.UK

2.0 The Draft Local Plan

The LBHC is preparing a Local Plan for the area, to manage the future development and growth of the area between 2021 and 2041. This is intended to replace the Core Strategy (adopted 2012); Development Management Local Plan (2013); Harrow and Wealdstone Area Action Plan (2013) and Site Allocations Local Plan (2013) document and associated Policies Map; and, potentially, existing Supplementary Planning Documents (SPDs). The draft Local Plan will be produced in general conformity with the London Plan (2021). It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF, 2023) and National Planning Practice Guidance (NPPG).

One of the key requirements for producing a draft Local Plan will be to identify sufficient land for housing, economic development and other uses to meet the identified needs of the Borough, whilst also ensuring that such land can be readily brought forward for development, including to enable LBHC to demonstrate a five-year supply of deliverable housing sites. Provision for future housing and employment growth will be made in general conformity with the London Plan (2021). In addition, the plan will include policies to determine applications for development proposals (and change of use) to ensure; new/enhanced infrastructure (i.e. healthcare facilities, schools, community facilities) is delivered; deliver affordable housing, encourage good design; protect, enhance the natural (i.e. Green belt, Metropolitan Open Land (MOL), built, and historic environment, as well as address the causes and impacts of climate change, in order to promote sustainable development.



As set out in The London Plan (2021), Harrow Borough is expected to deliver a minimum of 8,020 homes in the period 2019-2029, of which 3,750 are to be delivered on small sites (below 0.25 hectares in size)². LBHC have undertaken a Local Housing Needs Assessment (2024) and are proposing to roll forward the London Plan 10-year housing delivery (8,020) and include a housing requirement/target of a minimum 16,040 within the Local Plan, during the Plan period (2021-41). The Local Plan evidence has assessed the capacity of all potential sources of housing supply, such as sites with extant permissions or under construction, site allocations and small sites (i.e. below 0.25ha) windfalls), to meet the housing requirement. The Local Plan housing trajectory indicates that the Borough has a housing capacity to delivery 16,829 homes (including 5,250 homes on small sites) over the plan period (2021-41). The borough capacity exceeds the housing requirement by 789 homes, which exceeds the target by 4.9%.

Housing needs are expected to be met through new and infill developments, redevelopment of previously developed sites and redundant buildings, conversions, change of uses and extensions to existing buildings. In line with the London Plan (2021), this is primarily expected to take place within the Harrow and Wealdstone Opportunity Area, the redevelopment and mixed-use development of sites within the existing Town Centres, as well as the incremental intensification of small sites within existing residential areas that have good access to local services, facilities, and public transport.

Employment needs are expected to be met through the intensification and redevelopment of existing employment sites; as there is limited scope to provide additional employment floor space due to the tight urban boundary and housing pressure. There is no loss of employment land envisaged given the identified need to retain existing floorspace (including through re-provision as part of any redevelopment). Consistent with the London Plan, LBHC considers that the prioritisation of previously developed sites will have sufficient capacity to fully meet the future development needs of the area within the existing built-up area of the Borough.

LBHC, along with neighbouring London Authorities, have agreed to meet their respective London Plan housing requirement in full within their own boroughs. Hertfordshire authorities to the north are requesting London Boroughs to meet their unmet needs but they still have to demonstrate they have explored all options to fully accommodate their needs within their administrative boundaries. At present there are no neighbourhood plans being progressed in Harrow.

The draft Local Plan contains strategic objectives covering local identity, infrastructure, transport, air quality, open space, biodiversity, climate emergency, waste and recycling, housing, affordable housing, housing types, mixed and inclusive communities, local economies and town centres. The draft Local Plan also contains preferred policies and site allocation options. Main modifications have been proposed by the Planning Inspector following the Examination hearings. The IIA has been updated to reflect the modifications which are material to the assessment. Further editorial changes have been

² The London Plan 2021. [the_london_plan_2021.pdf](#) (Accessed 14/07/23)



made to reflect other modifications which have not necessarily made a difference to the IIA findings but have been made to ensure accuracy.

2.1 Overview of the Plan area

Harrow is a Borough in outer London, situated 10 miles to the north-west of central London. The Borough has a land area of approximately 5,047 hectares, making it the 12th largest Borough (by area) in London. To the south, Harrow is neighboured by additional London Boroughs- Brent, Barnet, Ealing and Hillingdon. To the north, Harrow is neighboured by Hertsmere Borough Council and Three Rivers District Council. Figure 2-1 below presents Harrow's location.

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

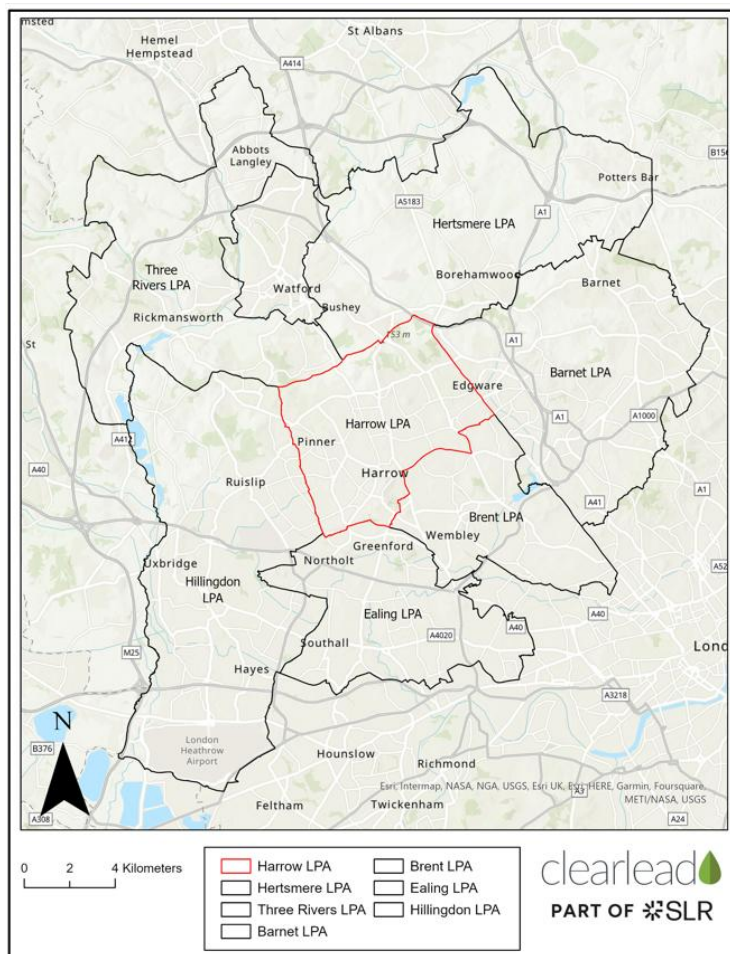


Figure NTS 2-1: Harrow, and its surrounding Local Plan Authorities



3.0 How the Plan and its Alternatives were Assessed

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

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

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

During Stage A, data about the Borough and the context in which the plan is being prepared was collated in a IIA Scoping Report in order to identify the key issues within the Borough and how they could be affected by the draft Local Plan.

The IIA Scoping Report was consulted on with the statutory consultees (Natural England, the Environment Agency and Historic England, as well as key local stakeholders) in October / November 2023. The information was amended in response to comments received and the final output of stage A is a framework of objectives and assessment questions against which the Local Plan and its reasonable alternatives can be tested. The IIA Framework can be seen in Table NTS 3-1.



Table NTS 3-1: IIA Framework

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



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



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



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Air, Noise & Light	IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	<ul style="list-style-type: none"> • ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development? • avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?
Climatic Factors	IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases	<ul style="list-style-type: none"> • support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)? • support the shift towards usage of electric and ultralow emissions vehicles? • promote a low carbon local economy? • ensure new developments are energy efficient? • minimise greenhouse gas emissions?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
	IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	<ul style="list-style-type: none"> • minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage? • ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity? • encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?
Biodiversity, Geodiversity, Flora & Fauna	IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	<ul style="list-style-type: none"> • avoid adverse effects on European designated habitats sites? • conserve, enhance and repair nationally and locally designated wildlife sites? • conserve, enhance and repair natural and semi natural habitats? • contribute to the delivery of new or safeguard existing BAP priority species and habitats? • achieve biodiversity net gain (BNG) in new developments? • provide new or improved access to greenspaces? • contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)? • protect sites of geological importance?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Cultural Heritage	IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	<ul style="list-style-type: none"> • 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? • encourage heritage-led regeneration? • help provide solutions to those assets on the Heritage at Risk register?
Landscape and Townscape	IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character	<ul style="list-style-type: none"> • respect, maintain and strengthen local landscape and townscape character and distinctiveness? • promote high quality and contextually successful design? • avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact? • protect sensitive areas and protected views? • safeguard landscape and townscape features such as trees?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Soils, Water & Minerals	IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	<ul style="list-style-type: none"> • seek to improve or remediate contaminated land or reuse previously developed land which has not been restored? • avoid development of greenfield land? • promote the efficient use of minerals? • protect soil quality and avoid soil pollution? • ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments? • protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies? • Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?
Waste	IIA14 Waste: To minimise waste	<ul style="list-style-type: none"> • encourage new developments to provide adequate space for waste separation? • encourage the repurposing and refurbishing of buildings, instead of demolition? • ensure waste is dealt with in line with circular economy principles? • safeguard existing waste management sites?



A version of the Local Plan Regulation 18 preferred policies and reasonable policy alternatives were provided to SLR in December 2023 / January 2024 for assessment. The performance of the policy alternatives is presented within Appendix C.

Assessment involves identifying the significant environmental, economic, social, health and equality effects of the Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and presenting the findings within an IIA Report.

All Local Plan policies and sites allocation options have been assessed against the IIA Framework, shown in Table NTS 3-1, and reference has been made to the data about the area and key sustainability issues in the Borough identified during the scoping stage. A summary of the findings is presented within Section 5 and 6 of this NTS.

Following Regulation 18 consultation, modified policies was provided to consultants in batches across August 2024. Following a screening of changes, twenty-nine preferred policies were re-assessed following Regulation 18 consultation. Four new policies were also provided to consultants for assessment in July 2024 (three policies) and October 2024 (one policy).

The Inspector's proposed main modifications to draft Local Plan policies and site allocations were screened in October / November 2025 to ascertain if any main modifications could be considered significant to the IIA and lead to changes in IIA performance thereby requiring updates to the assessments.

Modifications to 13 policies have been deemed to be significant to the IIA and the assessment findings updated in Section 7 of the main IIA Report.

No new policies have been included within the Inspector's main modifications to the Local Plan. Policy CE2: Design to Support the Circular Economy and Policy GR6 Areas of Special Character have been removed from the Local Plan and the IIA. Changes with regards to the choice of preferred policy options are documented in Section 6 of the main IIA Report.

Forty-one site allocation options have been assessed. These sites are all considered to be available, deliverable and suitable for development by LBHC. An initial batch of the Local Plan Regulation 19 site allocation options was provided to consultants in July 2024. The remaining batch of site allocation options was provided to consultants in August 2024. Main modifications to the site allocations have been screened and the assessments updated as necessary. The assessments of 29 site allocations have updated (see Section 8 of the main IIA Report). One site allocation (O19 Marsh Lane Gas Holders) has been removed from the Local Plan and from the IIA. It is no longer considered a reasonable alternative site, reducing the number of reasonable site options to forty.

Summaries of the changes to the IIA performance resulting from the Inspector's main modifications can be found in Section 5 and 6 of this NTS.



4.0 What is the Borough Like Now and How May it Change in the Future?

Detailed data about the Borough is presented within Appendix B of the main IIA Report. Table NTS 4-1 provides a summary of the Borough and the key sustainability issues within Harrow, as well as the likely evolution of such issues over the lifetime of the Plan.

Table NTS 4-1: Key Sustainability Issues Identified for Harrow Borough and Likely Evolution Without the Local Plan

Sustainability Issues	Description	Likely Evolution Without the Plan
Economy and Employment		
Lack of economic activity	There is reduced economic activity across Harrow, including in Harrow town centre and Wealdstone industrial area, and smaller town centres such as Burnt Oak, North Harrow and Rayners Lane.	Without the Local Plan, the economic growth of the Borough is likely to be limited further.
Limited delivery of employment land	Employment land delivery within the Borough has historically been low.	Without the Local Plan, the provision of employment land is likely to be limited due to pressure from housing development. This could result in economic growth of the Borough being limited further.
Population and Equalities		
Population Increase	The population of the Borough will continue to increase significantly.	Without the Local Plan, average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen. A shortfall in primary and secondary school places, as well as Special Educational Needs and Disability (SEND) school places are also likely to likely to persist. Without the Local Plan it may be more



Sustainability Issues	Description	Likely Evolution Without the Plan
		difficult to direct new housing growth to locations where sufficient infrastructure capacity exists to accommodate additional needs and/or within accessible distances (e.g. schools/education provision).
Deprivation	Social deprivation is an issue for parts of Harrow, particularly the North, centre, and the South of the Borough.	Without the Local Plan, average house prices are likely to remain high and the provision of affordable housing is likely to remain small. As a result, the baseline situation could continue or worsen.
Dependant population	The Borough has an ageing population, with 19.7% of the Borough's residents predicted to live past 65 by 2031, resulting in an increasingly dependent population with resulting health and social care issues.	Without the Local Plan to encourage and facilitate the delivery of a mix of new, accessible housing and new community facilities, the baseline situation of an ageing population will continue.
Crime	Crime rates within the Borough relatively low, however fear of crime is considered an issue locally.	Without the Local Plan to discourage crime and acquisition across the Borough, the baseline situation is likely to continue.
Health		
Life expectancy	Levels of deprivation vary throughout the Borough; life expectancy is 7.8 years lower for men and 5.4 years lower for women in the most deprived areas of Harrow than in the least deprived areas	Without the Local Plan, health prospects may worsen, particularly in the most deprived areas, creating a larger gap in the life expectancy between Borough wards.
Health issues	There are a range of health issues across the Borough. Healthy life expectancy for the Harrow is subsequently lower than neighbouring Boroughs.	Without the Local Plan, health prospects may worsen creating more pressure on the National Health Service and poor health in residents e.g.



Sustainability Issues	Description	Likely Evolution Without the Plan
		obesity, tooth decay, and health issues associated with poor air quality.
Access to open space	More than 25% of Harrow is classed as Areas of Deficiency suggesting access to open space in these areas, specifically in the central and Southern section of the Borough where population density is higher, is limited	Policy intervention from the Local Plan could support improving levels of physical activity through walking and cycling, improving access to facilities and services by these modes through improvements to the public realm and improving access to open space, particularly in areas of deprivation.
Housing		
Housing mix and affordability	There is a need for a mix of housing to be provided across the Borough, relating to type, size and tenures. The average house prices across the Borough are high, particularly in relation to low wage levels. There is subsequently a shortage of affordable housing across the Borough to meet the overall needs identified.	Without the Local Plan, the Council is likely to be less effective in encouraging housing in the most sustainable locations, and ensuring the right type, size and tenure of housing is delivered to address local needs. This may adversely impact existing social, economic, environmental, and health inequalities and issues. Average house prices are likely to remain high and without the Local Plan requiring certain levels of affordable housing provision, the baseline situation could worsen.
Sustainable Locations	The London Plan seeks to direct higher levels of housing growth to the most accessible and sustainable locations of the Borough which it has identified as the Harrow Wealdstone Opportunity Area (including the Harrow Metropolitan and Wealdstone District Centre), followed by	Without the Local Plan, housing delivery could be constrained in the short term, although in the longer-term, requirements in the NPPF to have a five-year supply of housing sites would enable the further delivery of housing sites to meet need, through the planning application process. However, this would be on an ad-hoc basis and may



Sustainability Issues	Description	Likely Evolution Without the Plan
	Edgware Major Centre, and the District and local centres across the Borough.	potentially not be located in the most sustainable locations.
Transport and Accessibility		
Poor cycle networks	There are a number of barriers to cycling in the Borough, including unsafe routes, topography, public anti-social behaviour, and concern surrounding cycle theft.	Without the Local Plan, poor cycle networks could restrict the expansion of people using cycling as a means to travel, as well as threaten the safety of cyclists. Workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users.
Public transport demand and accessibility	The accessibility of public transport remains an issue within Harrow. Accessibility to public transport is low in some areas of deprivation, particularly to the North of the Borough and accessible, step-free entrances are not available at all tube stations. This is a significant issue as a significant proportion of disabled residents rely on public transport links. Harrow bus station is also operating over capacity.	Without the Local Plan and policy intervention to improve the transport network, workers may continue to predominately use private cars to travel to work, which will have impacts on the local environment (including air quality) and could exacerbate congestion, as well as safety issues for other road users. Without investment into the accessibility of public transport, current options may not meet the needs of the future population in the long term, which is expected to increase.
Air, Noise and Light		
Worsening of air quality	Air quality concerns remain an issue within the Borough, and Air Quality Focus Areas may be exacerbating inequalities related to	Without policy intervention and significant investments, the target to achieve carbon neutrality and therefore improve air quality in the Borough will



Sustainability Issues	Description	Likely Evolution Without the Plan
	air pollution health issues. This is highly likely to be linked to the reliance on private petrol/diesel fuelled vehicles as the primary mode of transport.	not be achieved. Development within the AQFA could also exacerbate current air pollution by increasing the number of people travelling by private vehicles.
Noise and Light Pollution	Development could also contribute to the creation of noise and light pollution within the Borough, through construction works or inappropriately located development.	Noise and light pollution levels are likely to worsen without the Local Plan; this is due to uncontrolled development, particularly in rural areas. This is likely to have adverse impacts on wellbeing.
Climatic Factors		
Contributions to climate change	Harrow Borough currently has minimal resilience to climate change or renewable energy capacity. Domestic and transport emissions are the main contributors of CO ₂ in the Borough as residents are reliant on petrol/diesel fuelled vehicles.	Without the Local Plan to encourage and facilitate resilience to climate change and the implementation of renewable energy generating developments, the baseline situation is likely to continue, or worsen with development. This will make it unlikely that Harrow Borough achieves its commitment to becoming carbon neutral by 2030.
Flood risk	The Borough is susceptible surface water flood events. Properties in Harrow stand to experience a 97% increase in internal hydraulic sewer flooding and a 35% increase in external hydraulic sewer flooding by 2050.	Flood risk is likely to become worse with climate change and the increased occurrence of extreme weather events, affecting the intensity and frequency of precipitation. Without the Local Plan guiding development to areas of lowest flood risk, the risk of development occurring in areas of higher flood risk could increase. The importance of sustainable adaptation measures to flood risk, such as SUDs, will also be dismissed without the Local Plan.



Sustainability Issues	Description	Likely Evolution Without the Plan
Biodiversity, Geodiversity, Flora and Fauna		
Pressure on protected species' habitats	There are a range of nature conservation sites and designated water bodies within the Borough which require protection from development. Potential effects on European designated Habitats Sites needs to be considered.	Development pressures could worsen without the Local Plan policies to guide development to the least sensitive parts of the Borough , and provide wildlife corridor zones. This could lead to continued degradation and possible loss of nature conservation sites, designated water bodies, and species. Further population growth could also increase pressure on existing nature areas, due to the lack of access opportunities.
Cultural Heritage		
Threats to the historic environment	There are a number of heritage assets and conservation areas likely to be impacted from development within the Borough. There are 19 assets on the heritage at risk register. There is pressure from development on the settings and significance of heritage assets and on wider historic landscapes and townscapes.	Without the Local Plan policies which protects heritage assets from the potential negative effects of development and encourages enhancements, the baseline situation is likely to continue.
Landscape and Townscape		
Threats to landscape	21.5% of the Borough is identified as Green Belt land and 6.2% is protected as Metropolitan Open Land.	Without the Local Plan policies which protect the certain areas of the landscape from the possible impacts of development, the baseline situation is likely to continue. Development pressures on Green Belt and Metropolitan Open Land are likely to contribute to landscape character degradation.



Sustainability Issues	Description	Likely Evolution Without the Plan
Soils, Water and Minerals		
Water resources	There is high demand for water resources across Harrow, as residents currently use more water per day than the London average. None of the waterbodies within the Borough are currently achieving 'good' overall status, and two waterbodies received an 'poor' overall status.	It is likely that increases to population will drive further water demand within the Borough. This is likely to place strain on both demand, as well as wastewater treatment services. Without the local plan encouraging efficiency measures such as SUDs to reduce flood risk and encourage quality, water resources are likely to be negatively affected.
Waste		
Waste	Less than two fifths of waste is recycled, reused, or composted within the Borough. As a result, the Borough falls within the lowest quartile for recycling in England.	With an increasing population within the Borough, it is likely that the amount of waste produced will continue to rise. Without the local plan, this will result in even less waste being recycled, reused or composted and is likely that the waste hierarchy will not be followed effectively.



5.0 Alternatives

5.1 Introduction

Where there are reasonable alternatives to the preferred elements of a plan (i.e. policies, sites, spatial strategy) the IIA must also assess them to the same level of detail and present the sustainability performance to allow comparison with the preferred options and to provide information for choices to be made between options. Commentary is provided within this Section focusing on the potential significant effects of the reasonable alternatives.

5.2 Alternative policy options

A number of reasonable policy alternatives have been assessed, all to the same level of detail, to allow comparison of the preferred and rejected options. Please note that the plan authors have not been able to identify reasonable alternatives for all policies. The reasonable alternatives are detailed within Appendix C of the main IIA Report and are outlined in Table NTS 5-1 overleaf.

The Inspectors main modifications include the following changes with regards to the choice of preferred policy options:

- An additional preferred alternative for **Policy HO1: Dwelling size mix** has been identified and selected by the Inspector. This preferred policy has been subject to IIA, the findings of which can be found within Section 6.2 of Appendix C and within Section 7.5 of the main IIA Report. The previous preferred policy has been identified as Policy HO1 Reasonable Alternative 5; and
- For **Policy GL3: Biodiversity**, the previously rejected alternative to this policy (to include a requirement for 10% biodiversity net gain to align with the Environment Act) has been selected by the Inspector and the previously preferred policy (to include a requirement for 15% biodiversity net gain) has been rejected.



Table NTS 5-1: Reasonable Alternatives

Local Plan Policy (Preferred)	Alternatives considered
Spatial Strategy - Evolution of existing spatial strategy included within the Core Strategy and updates this to ensure compliance with the London Plan 2021 (e.g. Policies SD1,6,7; HS1,2; GG2, etc).	Alternative 1- Retain existing spatial strategy of the Core Strategy (adopted 2012). Alternative 2 - Spatial strategy to enable the accommodation of a higher level of growth.
Policy GR10 Development on Infill and backland sites, garage sites, garden land and non-designated open spaces	Alternative 1 – No policy option. Alternative 2 – More permissive policy.
Strategic Policy 03 Meeting Harrow's Housing Needs	Alternative 1 – High housing growth. Alternative 2 - Low housing growth: stepped trajectory over a fifteen-year plan period.
Policy HO1: Dwelling Size Mix	Alternative 1 - Continue with existing policy DM 24 Housing mix. Alternative 2 - Do not include a target to that seeks to ensure 25% of housing delivered on a scheme are family sized dwellings (i.e. three bed or more). Alternative 3 - Include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing. Alternative 4 - Do not apply 25% family housing target to minor development. Alternative 5 - Include a target of 25% for the proportion of housing on a scheme that should be for family housing.
Policy HO2: Conversion and Redevelopment of Dwellings	Alternative 1 – Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).



Local Plan Policy (Preferred)	Alternatives considered
	<p>Alternative 2 – Policy should not include a minimum 130m² size threshold for the conversion/redevelopment of homes into flats.</p> <p>Alternative 3 – Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m² capable of providing a three-bed unit with access to a garden.</p> <p>Alternative 4 – Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6.</p> <p>Alternative 5 - The proposed housing conversions policy should not apply to demolitions of a larger family sized home.</p> <p>Alternative 6 - Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map.</p>
Policy HO4 Genuinely Affordable Housing	Alternative 1 - To put a greater emphasis on intermediate products.
Policy HO5 Housing Estate Renewal and Regeneration	<p>Alternative 1 – No policy.</p> <p>Alternative 2 - Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).</p>
Policy HO6 Meeting the housing needs of Older People	<p>Alternative 1 - Continue existing Local Plan policy approach (DM 29).</p> <p>Alternative 2 - Support proposals within/edge of town centres (excluding neighbourhood centres).</p> <p>Alternative 3 - Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period.</p>
Policy HO7 Supported and Specialist Housing	Alternative 1 - Continue existing Local Plan policy approach (DM 29).
Policy HO8 Purpose Built Student Accommodation (PBSA)	<p>Alternative 1 – No Policy.</p> <p>Alternative 2 - Allow PBSA schemes within accessible locations with PTAL 3-6.</p>



Local Plan Policy (Preferred)	Alternatives considered
Policy HO9 Large Scale Purpose Built Shared Living (LSPBSL)	<p>Alternative 1 – No policy.</p> <p>Alternative 2 - Do not require applicants to demonstrate a need for LSPBSL.</p> <p>Alternative 3 - Allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6.</p> <p>Alternative 4 - Do not include distance test for assessing over concentration of LSPBSL.</p>
Policy HO10 Housing with Shared Facilities (Houses in Multiple Occupation (HMO))	<p>Alternative 1 - Continue to apply existing policy (DM30).</p> <p>Alternative 2 - Allow conversion of family houses to HMOs (i.e. no consideration of the houses internal floor area (130m2) and the character of the area).</p> <p>Alternative 3 - Allow HMO's within accessible locations with a PTAL 3-6.</p> <p>Alternative 4 - Do not include a specific measure to assess the over concentration of HMOs.</p>
Policy HO12 Gypsy and Traveller Accommodation Needs	<p>Alternative 1 – No Policy.</p> <p>Alternative 2 - Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the Planning Policy for Traveller Sites.</p>
Policy LE1 Development Principles within Centres and Parades	Alternative 1 - Less restrictive policy.
Policy LE3 Industrial Land (considered as Alternative 2 at Regulation 18 stage)	Alternative 1 – Allow for the full range of appropriate industrial uses.
Policy GI2 Open Space	Alternative 1 - More restrictive policy (i.e. not allowing new community infrastructure on open spaces/recreational buildings in exceptional circumstances).
Policy GI3 Biodiversity	Alternative 1 - Including the requirement for 15% biodiversity net gain.
Policy CN1 Sustainable Design and Retrofitting	<p>Alternative 1 – Development size threshold.</p> <p>Alternative 2 - Approach to measuring zero carbon – Part L, Building Regulations.</p>



5.3 Alternative site options

Site allocation options have been identified by LBHC with the intent of meeting the Borough's identified housing requirement over the plan period, including a buffer to accommodate potential under-delivery. Site options have also been identified where required to accommodate additional non-residential and infrastructure development to meet identified need. Reasonable alternative site options have been identified in line with the NPPF, planning practice guidance, the London Plan and the spatial strategy and strategic policies of the draft Local Plan. A process has been followed by HBC to identify whether the site options were reasonable alternatives which should be subject to assessment through the IIA. The process involved:

- Site identification;
- Initial site eligibility sifting;
- Site suitability assessment;
- Detailed assessment (including site availability and deliverability); and
- Capacity identification.

40 reasonable alternative sites have been identified through this process and have been subject to IIA. Detailed assessment spreadsheets for all identified reasonable alternative site options can found in Appendix F of the main IIA Report. All of the remaining reasonable alternative sites have been included within the draft Local Plan as allocations.



6.0 Assessment of the Draft Local Plan policies

6.1 Introduction

The summary tables in this section present the sustainability performance of the policies of the draft Local Plan.

For each group of policies, a summary table is presented which contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is shown in Table NTS 6-1.

Table NTS 6-1: Key to Sustainability Significance Scores

Potential Sustainability Effect	Symbol
Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	---



Table NTS 6-2: Summary of Spatial Strategy Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Spatial Strategy	++	+	+	+	++	++	+	+	0	+	+	+	+	+

Table NTS 6-3: Summary of High-Quality Growth Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 01: High Quality Growth	++	0	0	+	0	+	0	0	0	0	+	++	0	0
GR1 Delivering High Quality Design	0	0	+	+	0	0	++	+	+	+	+	+	+	+



Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
GR2 Inclusive Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0
GR3 Public Realm and Connecting Places	0	0	+	+	0	+	+	+	+	+	+	+	0	0
GR3A Inclusive Design	0	0	++	+	+	+	0	0	0	0	+	0	0	0
GR3B Safety, Security and Resilience to Hazards	0	0	0	+	0	0	0	0	0	0	0	0	0	0
GR4 Building Heights	+	0	0	+	+	0	+	0	0	0	+	++	0	0
GR4A Basement Development	0	0	0	+	+	0	0	0	+	+	+	0	+	0
GR5 View Management	0	0	+	0	0	0	0	0	0	0	+	++	0	0
GR7 External Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0
GR8 Shopfronts and Forecourts	+	0	+	+	0	0	0	0	0	0	0	+	0	0



Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
GR9 Outdoor Advertisement, Digital Display and Hoardings	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10 Development on Infill and backland sites, garage sites, garden land and non-designated open spaces	0	0	0	+	+	0	0	0	0	0	0	+	0	0
GR11 Planning Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0
GR12 Delivery of Site Allocations	0	0	+	0	++	+	0	0	0	0	0	+	0	0



Table NTS 6-4: Summary of Heritage Policy Assessment

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 02: Harrow Heritage Assets	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1 Heritage Assets	+	0	0	0	0	0	0	0	0	+	++	++	0	0
HE2 Enabling Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0



Table NTS 6-5: Summary of Housing Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 03: Meeting Harrow's Housing Needs	+	0	+	+	++	+	-	0	0	0	0	-	+	0
HO1 Dwelling Size Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
HO2 Conversion and Redevelopment of Larger Dwellings	0	0	+	+	++	+	+	+	0	0	+	+	+	+
Policy HO3 Optimising the Use of Small Housing Sites	0	0	0	0	+	0	0	0	0	+	0	+	0	0
Policy HO4 Genuinely Affordable Housing	0	+	0	0	++	0	0	0	0	0	0	0	0	0
Policy HO5 Housing Estate Renewal and Regeneration	0	0	0	++	++	++	0	+	0	0	0	+	+	0



Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO6 Meeting the housing needs of Older People	0	0	++	+	++	+	0	+	0	0	0	0	0	0
Policy HO7 Supported and Specialist Housing	0	0	++	+	+	+	0	0	0	0	0	0	+	0
Policy HO8 Purpose Built Student Accommodation	+	0	+	+	+	+	0	0	0	0	0	0	0	0
HO9 Large Scale Purpose Built Shared Living	+	+	+	+	+	+	0	+	0	0	0	+	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation)	0	0	+	+	++	+	0	+	+	+	0	+	0	+
HO11 Self-build and Custom-build Housing	0	0	+	0	+	0	0	0	0	0	0	0	0	0
HO12 Gypsy and Traveller	0	0	+	+	+	+	0	0	+	+	0	+	+	+



Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Accommodation Needs														

Table NTS 6-6: Summary of Local Economy Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 04: Local Economy	++	++	+	+	?	0	0	0	0	0	0	0	0	0
Strategic Policy 05: Harrow & Wealdstone Opportunity Area	++	+	+	+	+	++	0	+	+	+	+	+	0	0



Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
LE1 Development Principles within Centres and parades	++	+	+	+	?	+	+	0	0	0	0	+	0	+
LE2 Night-time and Evening Economy	++	+	-	0	0	0	+	0	0	0	0	0	0	0
LE3 Industrial Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+
LE4 Culture and Creative Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5 Tourism and Visitor Accommodation	++	+	+	+	+	+	+	0	0	0	+	+	0	+



Table NTS 6-7: Summary of Social Infrastructure Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 06: Social Infrastructure	+	+	+	+	0	0	0	0	0	0	0	0	0	0
SI1 Safeguarding and Securing Social Infrastructure	+	+	+	++	0	+	+	0	0	0	0	0	0	+
SI2 Play and Informal Recreation	0	0	+	++	0	0	0	0	+	+	0	0	0	0
SI3 Sport and Recreation	+	+	+	++	0	+	?	0	0	0	0	?	0	0
SI4 Digital and Communications Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0



Table NTS 6-8: Summary of Green Infrastructure Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 07: Green Infrastructure	0	0	0	+	0	0	+	0	+	+	+	+	+	0
G11 Green Belt and Metropolitan Open Land	0	0	0	0	0	0	0	0	0	+	+	+	+	0
G12 Open Space	0	0	+	+	0	0	0	0	+	+	0	0	0	0
G13 Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
G14 Urban Greening, Landscaping and Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
G15 Food Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0



Table NTS 6-9: Summary of Climate and Nature Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 08: Responding to the Climate and Nature Emergency	0	+	0	+	0	++	+	++	+	+	0	0	+	+
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
CN2 Energy Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0
CN3 Reducing Flood Risk	+	0	0	+	0	0	0	0	++	+	0	0	+	0
CN4 Sustainable Drainage	+	0	0	+	0	0	0	0	++	+	0	0	++	0
CN5 Waterway Management	0	+	0	0	0	0	0	0	+	+	0	0	+	0



Table NTS 6-10: Summary of Waste and Circular Economy Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 09: Managing Waste and Supporting the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1 Reducing and Managing Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++



Table NTS 6-11: Summary of Movement Policy Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 10: Movement	+	0	?	+	0	++	+	+	0	0	0	0	0	0
M1 Sustainable Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2 Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0
M3 Deliveries, Servicing and Construction	0	0	0	+	0	+	+	+	0	0	0	0	0	0



No potential significant negative effects have been identified in the assessment of the modified preferred policies. Potential effects have been summarised by policy group below.

Spatial Strategy Policy

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

High Quality Growth Policies

Potential significant positive effects being identified in relation to IIA1 (Economy) for Strategic Policy 01: High Quality Growth, IIA3 (Accessibility) for Strategic Policy 01: High Quality Growth and GR3A Inclusive Design, IIA5 (Housing) for GR12 Delivery of Site Allocations, IIA7 (Air, Light and Noise Pollution) for Policy GR1 Delivering High Quality Design and Policy GR9 Outdoor Advertisement, Digital Display and Hoardings, and IIA12 (Landscape and Townscape) for Strategic Policy 01: High Quality Growth, Policy GR4 Building Heights and Policy GR5 View Management.

Heritage Policies

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

Housing Policies

The Housing chapter policies have performed well, particularly against IIA objectives relating to Housing (IIA5), Accessibility (IIA3), Health and Wellbeing (IIA4) and Sustainable Travel (IIA6).

Local Economy Policies

Potential significant positive effects have been identified in relation to IIA1 (Economy) for five of the Local Economy chapter policies. Potential significant positive effects have also been identified in relation to IIA2 (Employment) for Strategic Policy 04: Local Economy, and IIA6 (Sustainable Travel) for Strategic Policy 05: Harrow & Wealdstone Opportunity Area. An uncertain effect has been identified in relation to IIA5 for Strategic Policy 04 (Local Economy) and Policy LE1 (Development Principles within Centre and Parades) because it is not clear how many homes will be provided by mixed use development schemes.

Social Infrastructure Policies

All of the policies have generally performed well, with potential significant positive effects being identified in relation to IIA4 for SI1 Safeguarding and Securing Social Infrastructure, SI2 Play and Informal Recreation, and SI3 Sport and Recreation. Uncertain effects are identified for SI3 Sport and Recreation in relation to IIA7 (Air, Light and Noise Pollution) and IIA12 (Landscape and Townscape).



Green Infrastructure Policies

Potential significant positive effects have been identified in relation to IIA10 (Biodiversity and Geodiversity) for policies GI3 Biodiversity and GI4 Urban Greening, Landscaping and Trees.

Climate and Nature Policies

The policies have generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA6 (Sustainable Travel), IIA8 (Climate Change Adaptation), IIA9 (Climate Change Mitigation) and (IIA13 Soil and Water).

Waste and Circular Economy Policies

Most potential effects are identified as neutral, which is largely because the policies are not considered to be relevant to many of the IIA objectives. As would be expected, all three of the policies should result in potential significant positive effects with regards to IIA14 (Waste).

Movement Policies

The policies generally perform well, although, as for the Waste chapter policies, many potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. Potential significant positive effects have been identified in relation to IIA6 (Sustainable Travel) for Strategic Policy 10: Movement, Policy M1 Sustainable Transport, and Policy M2 Parking. An uncertain effect is identified for Strategic Policy 10 in relation to Accessibility (IIA3).

Differences to the Assessment of Policies resulting from the Main Modifications

The text below summarises the changes to the performance of the policies as a result of the main modifications:

- Spatial Strategy: the addition of text relating to waste and recycling has resulted in an improvement in the potential effects against IIA14 (Waste) from a neutral to potential minor positive effect);
- Policy GR4A Basement Development: additional supporting text suggesting proposals for new basements within an Archaeological Priority Area (APA) should consult with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment has resulted in an improved performance against (IIA11 (Heritage) from a neutral to potential minor positive effect);
- Policy GR8 Shopfronts and Forecourts: removal of policy wording relating to conserving and enhancing the significance of heritage assets from this particular policy has resulted in a change against IIA11 (Heritage) from a potential minor positive to neutral effect);
- Policy GR10 Development on Infill and backland sites, garage sites, garden lands and non-designated open spaces: the removal of text from this policy to avoid repetition within the Local Plan has resulted in altered results in the IIA of this



specific policy. The assessments against IIA3 (Accessibility), IIA6 (Sustainable Travel), IIA10 (Biodiversity) and IIA14 (Waste) have all changed from potential minor positive to neutral effects);

- Policy HO4 Genuinely Affordable Housing: the removal of text relating to vacant building credit has resulted in a change against IIA13 (Heritage) from a potential minor positive to a neutral effect;
- Strategic Policy 04 Local Economy: adding clarity to the policy that it aims to deliver 13,900m² of retail, food and beverage facilities and 7,000m² of leisure, entertainment and cultural facilities has resulted in improved performances against IIA3 (Accessibility) and IIA4 (Health) from a neutral to potential minor positive effect;
- Policy LE1 Development Principles within centres and parades: the proposed modifications delete reference to residential use in certain circumstances being 'resisted' and therefore it is less clear as to how many homes will be provided within town centres and mixed use development schemes and the assessment has therefore changed with regards to IIA5 (Housing) from a neutral to an uncertain effect;
- Policy LE2 Night-time and Evening Economy: the removal of policy wording ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community has resulted in a change against IIA3 (Accessibility) from a potential minor positive effect to a potential minor negative effect and a significant EqlA effect);
- Strategic Policy 06 Social Infrastructure; the modified wording removing blue and green infrastructure from this particular policy has resulted in changes against IIA9 (Climate Change Adaption) and IIA10 (Biodiversity) from potential minor positive effects to neutral;
- Policy SCI3 Sport and Recreation: the removal of policy text relating to the control of floodlit lighting and residential amenity from this specific policy has resulted in changes against IIA7 (Air, Noise and Light Pollution) and IIA12 (Landscape and Townscape) from potential minor positive to uncertain effects. The removal of other policy wording to remove repetition of national planning guidance has also resulted in changes against IIA10 (Biodiversity), IIA11 (Heritage) and IIA13 (Water and Soil) from potential minor positive to neutral effects;
- Policy GI1 Green Belt and Metropolitan Open Land: removal of text from this policy relating to the beneficial uses of land has resulted in a change against IIA4 (Health) from potential minor positive to a neutral effect;
- Strategic Policy 10 Movement: modified policy wording (and supporting text) has resulted in a change against IIA3 (Accessibility) from potential minor positive to uncertain because the loss of some parking may result in some disproportionate effects on some equality groups. An additional EqlA effect has also been identified. Additionally, encouragement of e-bikes and e-scooters can cause obstacles which may present challenges to some equality groups. However, the



policy does support the Healthy Streets approach which includes measures such as ensuring that streets are easy to cross, people feel safe and everyone feels welcome. Effects may depend upon the implementation of different elements of this policy, therefore, uncertain effects have been identified; and

- Policy M2 Parking: modifications to this policy have not resulted in any changes to the IIA performance but have resulted in an additional EqlA effect) because although car free developments will still need to make provision for disabled car parking, this won't benefit all equality groups.

7.0 Assessment of site options

The summary table in this section presents the sustainability performance of the site options of the draft Local Plan.

The summary table contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is the same as that shown in Table NTS 7-1. The sites assessed are listed in the left-hand column of the summary table. Commentary has been provided on the uncertain and significant negative effects overleaf.



Table NTS 7-1: Summary of the Site Options Assessment

Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Site OA1- Queen's House Carpark	++	++	++	+	++	++	0	+	-	+	+	0	+	0
Site OA2- Harrow on the Hill	++	++	++	+	++	++	0	++	-	+	-	0	+	0
Site OA3- 15-29 College Road	?	?	++	?	+	++	0	+	+	+	-	0	+	0
Site OA4- Havelock Place	?	?	++	+	++	++	0	+	+	0	-	0	+	0
Site OA5- Station Road East, Harrow	++	++	++	+	++	++	0	++	-	0	-	0	+	0
Site OA6- Greenhill Way	++	++	++	++	++	++	0	+	-	+	-	0	0	0
Site OA7- Tesco Station Road	++	++	+	+	++	+	0	++	-	0	-	0	0	0
Site OA8- Former Royal Mail Sorting Office, Elmgrove Road	+	+	+	+	+	+	0	+	+	+	+	+	0	0



Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Site OA9 -Poet's Corner & Milton Road	?	?	+	+	++	+	0	+	-	+	+	0	0	0
Site OA10- Wealdstone Parole Office	?	?	+	+	+	+	0	+	-	+	-	0	0	0
Site OA11- Carpark Ellen Webb Drive	++	++	++	+	++	++	0	+	-	+	+	0	0	0
Site OA12- Peel Road	+	+	++	+	++	++	0	+	+	+	-	0	0	0
Site OA13- Travis Perkins Wealdstone	?	?	++	+	+	++	0	+	-	+	+	+	0	0
Site OA14- Byron Quarter	++	++	+	++	++	+	0	++	-	0	+	0	-	0
Site OA15- Iceland Wealdstone	+	+	+	+	+	+	0	+	-	+	-	0	0	0
Site OA16- Kodak	++	++	+	+	++	+	0	-	-	0	-	0	0	0
Site OA17- Former Kodak	++	++	+	+	++	+	0	-	+	0	+	0	0	0



Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Administration Offices														
Site GB1- Royal National Orthopaedic Hospital	++	++	0	+	0	-	0	-	+	0	-	--	--	0
Site GB2- Watling Farm	0	-	--	-	++	--	0	-	-	0	+	--	--	0
Site O1- Waitrose South Harrow	++	++	+	+	++	+	0	++	-	+	+	+	0	0
Site O2- Roxeth Library & Clinic	+	+	++	+	+	++	0	+	+	+	+	+	+	0
Site O3- Northolt Road Nursery and Carpark at rear of 27 Northolt Road	+	+	++	+	+	++	0	+	-	+	-	+	+	0
Site O4- Grange Farm	+	+	+	+	++	-	0	+	-	0	-	+	-	0
Site O5- Harrow School Estate & John Lyon School	+	0	0	+	0	+	0	+	-	0	-	--	+	0



Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Site O6- Brethrens Meeting Hall, The Ridgeway	0	0	0	+	0	0	0	-	-	0	+	+	+	0
Site O7- Rayners Lane Station Carpark	+	+	+	+	+	+	0	+	-	0	-	+	0	0
Site O8- Harrow West Conservative Association	?	?	+	+	+	+	0	-	-	+	+	+	0	0
Site O9- Pinner Telephone Exchange	0	0	+	+	+	--	0	-	-	0	+	+	0	0
Site O10- Harrow View Telephone Exchange	+	+	-	+	+	--	0	+	+	+	+	0	+	0
Site O11- North Harrow Methodist Church	?	?	+	+	+	+	0	-	-	0	+	+	0	0
Site O12- Hatch End Telephone Exchange	?	?	+	+	+	+	0	+	+	+	+	+	0	0



Site	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Site O13- Harrow Arts Centre	+	0	0	+	0	+	0	+	+	0	-	+	-	0
Site O14- Vernon Lodge	0	0	0	0	+	-	0	-	-	0	+	0	+	0
Site O15- Belmont Clinic	+	+	0	+	+	-	0	-	-	0	+	0	-	0
Site O16- Travellers Rest, Kenton Road	++	+	++	+	++	++	0	+	-	+	+	0	0	0
Site O17- Kenton Rd Telephone Exchange	+	+	+	+	+	+	0	-	-	+	+	0	0	0
Site O18- Wolstenholme	0	0	0	+	+	-	0	-	+	0	-	0	-	0
Site O20- Canons Park Station Carpark	-	+	+	+	+	+	0	-	+	0	-	+	0	0
Site O21- Anmer Lodge	++	+	+	+	++	+	0	+	-	0	+	0	-	0
Site O22- Stanmore Station Carpark	+	-	+	+	++	+	0	+	-	0	-	+	+	0



Uncertain effects were identified for Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association as it is unclear whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites, making it difficult to determine the significance of the potential effect on IIA1 (Economy) and IIA2 (Employment).

Similarly, uncertain effects on IIA1 (Economy) and IIA2 (Employment) are identified for Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road as it is unclear whether the development of these sites will lead to the loss of existing employment space.

An uncertain effect has also been identified for 15-29 College Road as it is unclear whether the loss of a church as a result of development has been proven as a facility deemed no longer necessary by LBHC due to a lack of need, or if this infrastructure would be provided elsewhere. This subsequently makes it difficult to determine the significance of the potential effect on IIA4 (Health).

Potential significant negative effects have been identified for Watling Farm in relation to IIA3 (Accessibility and Inequalities) and IIA6 (Sustainable Travel) for Watling Farm and Harrow View Telephone Exchange as these sites were assessed as not being in close walking distance to a number of local facilities and services, as well as holding a PTAL score between 1 and 2, suggesting significant issues with accessibility to public transport. They also did not make on site provision for further facilities and services (e.g. retail or community uses).

Potential significant negative effects are identified in relation to IIA12 (Landscape and Townscape) for Royal National Orthopaedic Hospital, Watling Farm and Harrow School Estate and John Lyon School as the sites are either classified as 'Green Belt' or MOL. Depending on the design of the development proposed here, the development of these sites could potentially be contrary to the purposes of the Green Belt or MOL designations which include maintaining openness, preventing urban sprawl and encouraging urban regeneration.

Additional, potential significant negative effects are identified in relation to IIA13 (Water and Soil) identified for Royal National Orthopaedic Hospital and Watling Farm as the sites are either fully or partially greenfield land and Grade 3 agricultural land (classified as best and most versatile); development would subsequently lead to the permanent and irreversible loss of these land types. The sites also contain or lie in close proximity to a number of historic landfills, which suggests that the land is at risk of contamination which would require further investigation.

Differences to the Assessment of Sites resulting from the Main Modifications

For sites OA1, OA2, OA5, OA6, OA7, OA9, OA10, OA11, OA14, OA15, OA16, GB1, GB2, O1, O3, O4, O5, O6, O7, O8, O11, O14, O15, O16, O17, O21 and O22 potential effects identified against IIA9 (Climate Change Adaptation) were changed from minor positive to minor negative. This change was made in light of additional site information on surface water flooding risk. Similarly, for Site OA9 (Poet's Corner and Milton Road) potential effects identified for IIA9 have changed from neutral to minor negative;



The additional information on flooding has also resulted in potential significant negative effects on IIA9 (Climate Change Adaptation) for Site O9 (Pinner Telephone Exchange), as the edge of site lies within Flood Zone 2 and 3, and backs onto Yeading Brook.

For Site O15 (Belmont Clinic) additional information has been provided on the housing provision, which was previously unknown. This has removed the uncertainty identified against IIA5 (Housing) upgrading the potential effects to potential minor positive.

The removal of parking from sites OA1, OA6, OA12, OA14 and O7 has resulted in a reduction from significant positive effects to minor effects against IIA8 (Climate Change Contributions). As Policy CN2 sets out requirements for EV charge points as part of new developments, it is deemed that this will reduce the provision of EV charge points within the Borough and could reduce the ability of new residents to minimise their contributions to climate change.

Site GB1 (Royal National Orthopaedic Hospital) will no longer provide housing and will just include the redevelopment of the hospital. This has altered a number of potential effects. Significant positive effects associated with IIA5 (Housing) are no longer relevant and therefore neutral effects have been identified. Significant negative effects identified in association with site GB1 for IIA3 (Accessibility) have been changed to neutral. This is because the site no longer provides housing, therefore the accessibility to local services for residents is no longer a significant issue. Potential significant negative effects associated with IIA6 (Sustainable Travel) have been reduced to minor negative. Whilst the site has accessibility issues, as housing is no longer provided, this is less of a significant issue.

8.0 Equalities Impact Assessment

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

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

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

Within the IIA the following objectives are relevant to the EqIA: IIA1, IIA2, IIA3, IIA4, IIA5, IIA6 and IIA7.

Overall, the Local Plan policies and site options have resulted in positive effects across these objectives, with no significant negative or uncertain effects being identified. All protected characteristics (as outline in the Equality Act) are likely to benefit from the Plan. Positive equality effects derived from the Plan include:



- **Employment Opportunities:** Providing equitable access to jobs that provide decent living incomes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities and minority ethnic and religious groups.
- **Improving access to community infrastructure:** Improving access to health, social and community infrastructure would increase access to education/ schools facilities, as well as other public spaces available for community use, and ensure everyone has equal access to public and/or private recreational space.
- **Accessibility:** Ensuring design is inclusive would increase access and safety for women, children, the disabled and the elderly. All new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances.
- **Housing Provision:** The provision of well designed and well located housing (including the provision of affordable, adaptable and conventional market rate homes) should help to ensure that all residents both current and future, including minority groups (e.g. residents with disabilities and/or other needs) are able to locate suitable housing within the Borough.
- **Climate Change:** Ensuring the development of appropriate energy infrastructure is considered to bring a number of positive benefits for all protected characteristic groups, mainly by decreasing the effects of climate change that would otherwise negatively affect Harrow's population.
- **Public Transport Improvement/ Provision:** Enhancing connectivity between the various neighbourhood and town centres would benefit all protected characteristic groups inclusively. This will enable people to access more services, amenities and employment opportunities.

Policy LE2: Nighttime and Evening Economy has resulted in a potential adverse effect on some protected characteristics.



9.0 Health Impact Assessment

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

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

Within the IIA the following objectives are relevant to the HIA: IIA2, IIA3, IIA4, IIA5, IIA6, IIA7, IIA8, IIA9, and IIA13. No potential significant negative effects were identified in relation to HIA for Local Plan policies and site options, however, some uncertain effects have been identified, which require mitigation.

Positive health effects derived from the Plan include:

- **Improving access to community infrastructure:** Improved access to community infrastructure, including sport and recreational facilities, encourages physical activity and delivers a range of social, mental and physical health and wellbeing, promoting healthy and high-quality lifestyles. The Local Plan would also see the delivery of more direct health interventions such as improved health and social infrastructure provision to meet needs.
- **Safe neighbourhoods:** Compliance with accessible and inclusive design standards, will ensure that the built environment can be used safely and with dignity by all groups inclusively. This should create safe neighbourhoods, allowing for greater social interaction and cohesion.
- **Climate change mitigation:** Implementing measures to mitigate against the effects of climate change should improve air quality, benefiting the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality. Additionally, reducing carbon emissions could reduce the health effects associated with climate change-induced extreme weather events, such as heat-related illnesses. Increasing the resilience of the Borough to climate change, would also help to reduce risks of major health issues caused by episodes of extreme weather.
- **Improving access to public transport:** Better access to public transport will increase accessibility for the Borough’s residents to employment opportunities as well as education, recreation and other facilities and services. This will help to improve social mobility and health outcomes. Additionally, improving access to public transport would reduce reliance on private vehicle usage, and help improve air quality.
- **Provision of open space:** The protection and enhancement of open spaces would provide areas within the urban environment further protection from sources



of noise or poor air quality, such as industry or roads. Provision of open space supports delivery of physical and mental health benefits.

- **Provision of affordable housing:** The provision of affordable and low cost rent homes would positively affect those of a low socio-economic status, which generally disproportionately includes those with disabilities. This provision should allow residents to live in suitable, but affordable accommodation including those with disabilities who may have specialist housing needs.

With regards to uncertain health effects, it is unclear how this quantum of development (16,040 dwellings) delivered over the plan period could cumulatively contribute to air, noise and light pollution. It is noted that this will be dependent on the location and design of developments. An increase to air pollution may disproportionately affect the young, the elderly, those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.

10.0 Habitats Regulations Assessment

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

Appendix G (HRA Report) of the main IIA Report sets out information about the Habitats Sites and the HRA assessments.

The screening of the draft Local Plan has identified potential pathways in relation to recreation pressure, air quality, water quality and water resources in relation to a number of the Habitats Sites. The potential risks to Habitats Sites relate to the amount of development proposed within the Plan. Screening of the Inspectors main modifications did not identify any new likely significant effects.

Following screening of the Regulation 18 Local Plan, further investigation was undertaken in the next stage of the HRA, Appropriate Assessment (AA). The AA has considered the potential for the Local Plan to undermine the conservation objectives of the Habitats Sites and to identify whether significant effects can be excluded.

Mitigation was put forward in the AA. This has been incorporated into Local Plan Strategic Policy 08: Responding to the Climate and Nature Emergency and Policy CN4: Sustainable Drainage and additional wording added to the supporting text of these policies. With the mitigation in place, the AA has determined that adverse effects on the integrity of the Habitat Sites considered can be excluded from the Harrow Local Plan, alone and in combination with other plans and projects. Natural England will be consulted on the conclusions of the AA prior to submission of the Local Plan for Examination.

11.0 Potential Cumulative Effects

The IIA is required to consider whether the effects of the Local Plan could be cumulative. Potential cumulative effects have been identified in the assessment of the



draft Local Plan policies and sites (with regards to the potential effects of the policies and sites interacting or combining).

With regards to the assessment of the draft Local Plan policies a number of potential positive cumulative effects have been identified in relation to IIA1 (Economy), IIA3 (Accessibility), IIA5 (Housing), IIA6 (Sustainable Travel), IIA8 (Minimising contributions to climate change), IIA10 (Biodiversity) and IIA11 (Historic Environment).

Plan policies encourage development to be focused into areas which have existing good access to local services and facilities. Policies direct growth into town centre areas, such as the Harrow Metropolitan Area and preserve and develop uses including retail, leisure and cultural extensions, hotels, and the nighttime economy within town centres. Collectively, this will assist in increasing the footfall, vibrancy and vitality of the Borough's town centres, supporting economic growth and regeneration. This could result in a potential positive cumulative effect on IIA1 (Economy) and IIA2 (Employment).

Furthermore, development on sites within the Harrow and Wealdstone Opportunity Area (which encompasses the town centre) could help to enhance current town centre uses and revitalise the area. The developments could also help to ensure a considerable employment offering is available in this area.

A number of draft Local Plan policies encourage development to be focused into areas which have existing good access to local services and facilities. Policies within Chapter 10 (Transport and Movement) of the draft Local Plan are also working to ensure there is good access to services via active and sustainable transport modes throughout the Borough. A potential positive cumulative effect against objectives IIA3 (Accessibility) and IIA6 (Sustainable Travel) could be achieved as a result.

The emphasis of new development requiring access to good public transport (through PTAL scores of 3 or higher) could lead to a focussing of development in limited areas of the Borough, around established town and district centres (which is where PTAL scores of 3 or higher currently exist). This could indirectly increase demand in such locations for local schools, healthcare services and leisure facilities, particularly within the Harrow Wealdstone Opportunity Area.

However, focusing development in the Harrow and Wealdstone Opportunity Area, followed by other accessible locations could support the achievement of a low carbon Borough.

Conversely, areas located further away from the Opportunity Area and those with lower PTAL scores may not receive enough development to maintain or create additional services and infrastructure, thus these areas may not see an increase in sustainable/active transport permeability or receive additional infrastructure. An uncertain cumulative effect is identified.

Some site allocations have potential to give rise to negative cumulative effects in relation to IIA3 (Accessibility and Inequalities), IIA6 (Sustainable Travel), IIA12 (Landscape and Townscape), IIA13 (Water and Soil). Sites with poor access to facilities/services and sustainable transport could make education, employment, leisure facilities and other services inaccessible without private cars and increase the need to travel.



Policies HO6 and HO7 work to ensure there is specialist housing available for those in the Borough who require it, accompanied by places to mix and meet and carer accommodation where appropriate. This could result in a potential positive cumulative effect with regards to housing delivery for residents who require specialist housing. Further cumulative positive effect in relation to IIA5 (Housing) will likely occur through affordable housing delivery, as between 35-50% of all development on residential sites will be developed as affordable housing (where viable).

A positive cumulative effect on biodiversity should be achieved in the Borough through implementation of the policies within Chapter 7 (Green Infrastructure), Chapter 8 (Responding to the Climate and Nature Emergency) and Policy HO3 (Small sites).

The development of a number of the sites could result in a loss of openness of the Green Belt and cause urban sprawl resulting in negative cumulative effects on IIA12 (Landscape and Townscape).

A potential uncertain cumulative effect has been identified in the assessment of sites in relation to IIA7 (Air, Light and Noise Pollution). An uncertain cumulative effect is identified as it is unclear whether the potential combined effects of pollution from sites which are in clusters, such as in Wealdstone and Harrow, can be mitigated. The provision of EV charging points is only required in new development where car parking is being provided. However, the amount of EV charging points is not identified and it is uncertain whether this will meet demand. An uncertain cumulative effect is therefore identified in relation to IIA8 (Climate Change Adaptation).

Potential cumulative effects could also occur through interaction of the draft Local Plan with other plans and projects in the Borough and in neighbouring areas.

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

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

12.0 Mitigation measures

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

- Avoid effects where possible;
- Reduce / minimise effects; and



- Mitigate any remaining effects (i.e. the residual effects).

Mitigation measures have been suggested where potential negative or uncertain effects have been identified within the assessment of draft Local Plan policies or site options. Specific mitigation measures for development proposals will be dealt with at the planning application stage when further detail on the layout, scale and location of development being proposed will be known. It is also important to emphasise that all proposals will be considered against the policies in the Local Plan and the London Plan 2021.

Mitigation measures put forward within the assessment of the draft Local Plan policies are listed within Table NTS 12-1 and mitigation measures put forward within the assessment of the draft Local Plan site options are listed within Table NTS 12-1 and



Table NTS 12-2.

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

Table NTS 12-1: Proposed Mitigation Measures for the Draft Local Plan Policies

Policy	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
Strategic Policy 04: Local Economy	IIA5: The policy should expand on the benefits mixed use development schemes could bring to housing development.
Policy SI3: Sport and Recreation	IIA7: The policy should set out how new sports and recreational facilities will impact on light and noise pollution. Restrictions to floodlit facilities should be outlined. Reference could be made to Policy GR1: Achieving a High Standard of Development, which outlines considerations to ensure residential amenity. IIA12: Clarity should be provided to outline whether outdoor facilities may be delivered on existing Metropolitan Open Land and other open space.
Strategic Policy 10: Movement	Parking and facilities for any cycling or e-scooter schemes should be accessible and not present physical barriers to users. Consultation should be undertaken with local equality groups prior to the loss of/change in parking.



Table NTS 12-2: Proposed Mitigation Measures for the Draft Local Plan Site Options

Sites	Explanation and Mitigation Measures to Minimise or Avoid Potential Effects
Poets Corner and Milton Road; Wealdstone Parole Office; Travis Perkins Wealdstone, Hatch End Telephone Exchange; North Harrow Methodist Church; Havelock Place; 15-29 College Road; and West Harrow Conservative Association.	IIA1: Further details of the sites' redevelopment could mitigate the uncertain effect identified.
Poets Corner and Milton Road; Wealdstone Parole Office; Travis Perkins Wealdstone; Hatch End Telephone Exchange; North Harrow Methodist Church; Havelock Place; 15-29 College Road; and West Harrow Conservative Association.	IIA2: Further details of the sites' redevelopment could mitigate the uncertain effect identified.
Royal National Orthopaedic Hospital; Vernon Lodge; and Watling Farm.	IIA3: The sites should be required to make contributions to the development of accessible facilities and to improvements to the local public transport/ active travel network, either on or offsite.
15-29 College Road.	IIA4: Further details of the sites' redevelopment could mitigate the uncertain effect identified.
Brethrens Meeting Hall, The Ridgeway; Royal National Orthopaedic Hospital; Harrow View Telephone Exchange; Pinner Telephone Exchange; Vernon Lodge; and Watling Farm.	IIA6: The sites should be required to make contributions to improve the local public transport and active travel network, either on or offsite.
Sites located clusters (e.g. in Wealdstone and Harrow).	IIA7: The sites should be required to implement noise and light mitigation measures.
All residential sites.	IIA8: Local Plan policy could require a proportionate amount of EV charging points to be provided where car parking is provided in a new development.
Harrow School Estate & John Lyon School; Royal National Orthopaedic Hospital; and Watling Farm.	IIA12: Loss of Green Belt or Metropolitan Open Land cannot be mitigated against. The developments should be required to maintain 'openness' of these sites in order to minimise the potential negative effect of redevelopment on Green Belt / MOL sites.
Byron Quarter, Royal National Orthopaedic Hospital, Watling Farm, Grange Farm, Harrow Arts Centre, Belmont Clinic, Wolstenholme and Anmer Lodge.	IIA13: The loss of the best and most versatile agricultural land, and greenfield land, is permanent and irreversible and cannot be mitigated.



13.0 Proposed monitoring arrangements

The final stage of the IIA is monitoring the significant effects of the plan after it is adopted and therefore monitoring proposals set out in the main IIA Report are a draft framework. Indicators are required to focus on effects which are predicted to be significantly negative or uncertain. The proposed IIA indicators may overlap with those proposed for monitoring the implementation of the Local Plan. Opportunities to streamline and align the monitoring between the IIA and the Local Plan will be taken as far as possible.

The proposed monitoring indicators are set out in Table NTS 13-1 below.

Table NTS 13-1: Proposed Monitoring Indicators

IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
IIA1	Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church and West Harrow Conservative Association.	Uncertain whether additional facilities (e.g. retail/town centre uses, employment space) will be delivered at these sites	Net additional retail, cultural, leisure and other town centre floorspace provided within town centre boundary. Total amount of office floorspace across the Borough and any change. Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS.
	Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road	Uncertain whether development will lead to the loss of existing employment space.	Net additional retail, cultural, leisure and other town centre floorspace provided within town centre boundary. Total amount of office floorspace across the Borough and any change. Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS.
IIA2	Wealdstone Parole Office, Hatch End Telephone	Uncertain whether additional facilities (e.g.	Net additional retail, cultural, leisure and other



IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
	Exchange, North Harrow Methodist Church and West Harrow Conservative Association	retail/town centre uses, employment space) will be delivered at these sites.	town centre floorspace provided within town centre boundary. Total amount of office floorspace across the Borough and any change. Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS.
IIA2	Poets Corner, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road	Uncertain whether development will lead to the loss of existing employment space, and jobs.	Net additional retail, cultural, leisure and other town centre floorspace provided within town centre boundary. Total amount of office floorspace across the Borough and any change. Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS.
IIA3	Vernon Lodge; and Watling Farm. Strategic Policy 10: Movement and Policy M2: Parking	Sites are not within close walking distance to local services; they lack access to public transport and did not make on site provision for further facilities and services (e.g. retail or community uses). Uncertainty over delivery of disabled parking spaces and whether facilities for any cycling or e-scooter schemes present physical barriers to users.	The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development. Number of new disabled parking spaces delivered. Number of complaints regarding accessibility within the public realm.
IIA4	15-29 College Road	Loss of church. Uncertain whether the church has been proven as a facility no	Change in social infrastructure provision.



IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
		longer necessary, or if this infrastructure would be provided elsewhere.	
IIA5	Strategic Policy 04: Local Economy	It is not clear how many homes will be provided by mixed use development schemes	<p>Tenure mix of new affordable housing units relative to identified local need.</p> <p>Off-site affordable housing contributions secured in lieu of on-site provision.</p> <p>Net additional dwellings delivered within Harrow and Wealdstone Opportunity Area.</p> <p>Net additional dwellings delivered within rest of Borough.</p> <p>Net additional family sized (3b/+) dwellings delivered.</p>
	Strategic Policy 08: Responding to the Climate and Nature Emergency	The policy places high demand on housing design which could lead to greater costs for developers which could affect delivery.	<p>Net additional dwellings delivered within Harrow and Wealdstone Opportunity Area.</p> <p>Net additional dwellings delivered within rest of Borough.</p> <p>Net additional family sized (3b/+) dwellings delivered.</p> <p>Number of dwellings delivered on small sites.</p> <p>Progress on the delivery of housing and other site allocations.</p>
IIA6	Brethrens Meeting Hall, The Ridgeway; Harrow View Telephone Exchange; Pinner Telephone Exchange; Vernon Lodge; and Watling Farm.	The sites do not have good walking distance to a number of local services, and present significant issues with accessibility to public transport.	The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development.



IIA Objective	Policy and Site Reference	Potential Effect	Proposed Monitoring Indicators
IIA7	Policy SI3: Sports and Recreation	Potential increased levels of noise and light pollution	Number of new noise and light pollution nuisance reports.
IIA12	Harrow School Estate & John Lyon School; Royal National Orthopaedic Hospital; and Watling Farm.	The development of these sites may have an adverse effect against the purposes of the Green Belt and Metropolitan Open Land designations- which include maintaining openness, preventing urban sprawl and encouraging urban regeneration- which may be contrary to national policies.	Change in the total amount green belt or metropolitan open land.
IIA12	Policy SI3: Sports and Recreation	Potential loss of Metropolitan Open Land and other open space to new outdoor sports facilities.	Proportion of new sports development located on existing Metropolitan Open Land and other open space.
IIA13	Royal National Orthopaedic Hospital; and Watling Farm.	The sites are either fully or partially greenfield land. Development would lead to the permanent and irreversible loss of Grade 3 agricultural land. The sites also contain or lie in close proximity to a number of historic landfills, which suggests that the land is at risk of contamination which would require further investigation.	Proportion of new development on PDL.

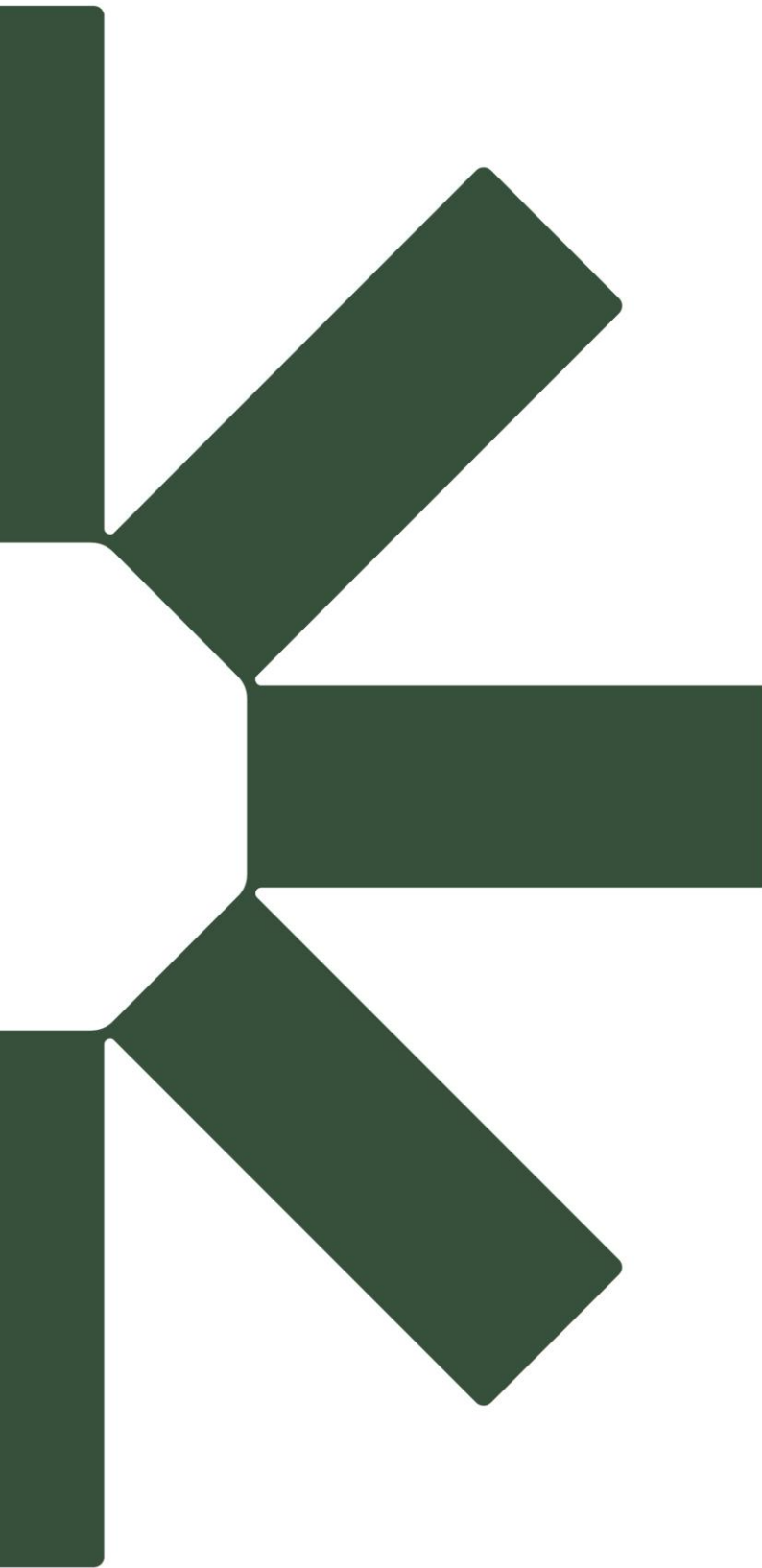


14.0 Next steps

This IIA Report is being published for consultation for a 6-week period alongside the Inspector's proposed main modifications to the Local Plan. Following consultation with statutory consultees on both this IIA Report and the Draft Local Plan, comments received on both will be considered by the Inspector before she finalises her report on the draft plan, including a final schedule of main modifications. The Inspector's final main modifications will need to be reflected in the draft plan prior to adoption (if found sound) in 2026 and the IIA updated if necessary.

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





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