


Harrow Council Area Action Plan, Site Allocations and Development Management Policies Development Plan Documents (Submission) Habitats Regulations Assessment October 2012	 LDF Local Development Framework
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1. Introduction

1.1 What is Habitats Regulations Assessment?

1.1.1 This report assesses the impact of Harrow's Core Strategy upon designated natural habitats of European importance. No such sites are located within Harrow but a small number exist within the vicinity of the borough boundary. The purpose of the assessment is to consider whether the Harrow & Wealdstone Area Action Plan development plan document, alone or in combination with other plans and projects, will have a likely adverse impact upon the integrity of any of these sites. If any likely adverse impact is detected then an 'Appropriate Assessment' (AA) will be required to determine whether or not the Area Action Plan will have an adverse impact on the integrity of the habitats' importance.

1.2 The Habitats Directive

1.2.1 Article 3 of the European Directive 92/43/EEC *Conservation of Natural Habitats and of Wild Fauna and Flora* (1992) establishes a Europe-wide network of special areas of conservation (SACs), formally known as 'Natura 2000' sites. The network also extends to special protection areas (SPAs) designated under the 1979 *Conservation of Wild Birds* directive. The purpose of the network is to maintain and, where appropriate, restore to favourable condition certain natural habitats and the habitats of certain species. For consistency with UK legislation and guidance, sites forming part of the Natura 2000 network will be referred to throughout the rest of this report as 'European sites'.

1.2.2 Article 6(3) of the directive establishes a requirement for 'Appropriate Assessment' of any plan or project which:

- is not directly connected with, or necessary to, the management of a European site; and
- would be likely to have an adverse impact upon the integrity of a European site, either alone or in combination with other plans or projects.

1.2.3 The article places a duty on 'competent national authorities' to agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after public consultation. If, despite a negative assessment, a plan or project must go ahead for reasons of overriding public interest, including social or economic reasons, then compensatory measures must be taken to protect the 'overall coherence' of European sites. However, where the site affected hosts a priority natural habitat type or a priority species, the only considerations that may be raised are those relating to: human health; public safety; beneficial consequences of primary importance to the environment; or other imperative reasons of overriding public interest.

1.3 The Habitats Regulations

1.3.1 The habitats directive is implemented in Britain by the Conservation (Natural Habitats, &c) Regulations 1994. The Regulations have been the subject of subsequent amendment including the Conservation (Natural Habitats, &c) (Amendment) Regulations 2007 and the Conservation of Habitats and Species Regulations 2010. Regulation 85B provides:

“(1) Where a land use plan—

(a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives”.

1.3.2 In accordance with the directive, the Regulations require the plan making authority to give effect to the plan only having ascertained that it will not adversely affect the integrity of a European site, unless there are considerations of overriding public interest (dealt with by Regulation 85C). The Regulations also require, as part of the assessment, consultation with the appropriate nature conservation body and, at the discretion of the plan making authority, provision for consultation with the general public.

2. Guidance on Habitats Regulations Assessment

2.1 Planning for the Protection of European Sites: Appropriate Assessment (2006)

- 2.1.1 This document, produced by the Department for Communities & Local Government in 2006 provides guidance on the application of the Habitats Regulations to regional spatial strategies and local development documents.
- 2.1.2 The guidance note recommends a three stage approach to the assessment of a plan's impact upon European sites (Regulation 85B):
- a) Assessment of likely significant effects (AA task 1);
 - b) Appropriate assessment and ascertaining the effect on site integrity (AA task 2); and
 - c) Mitigation and alternative solutions (AA task 3).
- 2.1.3 In exceptional cases, where likely harm to a European site is identified that cannot be mitigated and where there are no alternative solutions, there would be a fourth stage involving the consideration of imperative reasons of overriding public interest (Regulation 85C).
- 2.1.4 The guidance note goes on to describe the relationship between Appropriate Assessment and the process of developing and refining plan options, before setting out in greater detail the three stages identified above. Key points from the guidance are:

AA task 1: likely significant effects – such effects should be determined in relation to specific features, environmental conditions and the conservation objectives for the European site(s) concerned. The precautionary principle must be used. This means that if significant effects on a European site cannot be excluded, on the basis of objective information, either individually or in combination with other plans and projects, then appropriate assessment must be carried out.

AA task 2: appropriate assessment and effect on site integrity – this should involve an examination of the implications of a plan or project on the conservation objectives for the European site(s) concerned, to ascertain whether there would be an adverse affect on the site(s) integrity. Integrity means “the site’s coherence, ecological structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of species for which it was classified” (ODPM Circular 06/2005).

AA task 3: mitigation measures and alternative solutions – in relation to plan making this will usually involve modification of an option or consideration of alternative options, and then re-run tasks 1 and 2 of the assessment stages.

3. Harrow Core Strategy and the Submission Harrow & Wealdstone Area Action Plan, Site Allocations and Development Management Policies DPDs

3.1 Harrow Core Strategy

- 3.1.1 Preparation of the Harrow Core Strategy commenced in 2005/06. Following initial stages of public involvement, the Core Strategy went through three formal stages of preparation and consultation: Draft Preferred Options (2008); Preferred Option (2009/10); and Pre-Submission (2011). At each of these stages a Sustainability Appraisal (incorporating the requirements for strategic environmental assessment) and a Habitats Regulations Assessment was carried out and consulted upon. An independent Examination in Public of the Harrow Core Strategy was held during September/October 2011 and, following receipt of the Inspector's Report finding the document to be sound, the Core Strategy was adopted by the Council on 16th February 2012.
- 3.1.2 The Core Strategy seeks to accommodate housing growth of at least 6,050 new homes and 4,000 new jobs over the period 2009 to 2026. In tandem with the London Plan, the Core Strategy identifies an area for intensification incorporating Harrow town centre, Wealdstone district centre, Station Road (which links the two centres) and surrounding land at Wealdstone. The resulting 'Harrow & Wealdstone Intensification Area' is tasked to deliver at least 2,800 homes and 3,000 new jobs, thus representing a substantial proportion of the Borough's overall growth during the plan period. The remaining growth, of at least 3,250 homes and 1,000 jobs, is to be delivered throughout the rest of the Borough. Housing development is directed to previously-developed sites within the Intensification Area, town centres and other previously-developed locations well served by public transport. Redevelopment in Harrow town centre is expected to provide retail growth and appropriate office space renewal. Employment growth outside of the Intensification Area is to be achieved through mixed use redevelopment and diversification in town centres. Strategic criteria for the release of surplus industrial and business use land are provided to ensure the retention and renewal of stock which best meets local economic needs.
- 3.1.3 Other provisions of the Core Strategy seek to support and mitigate any adverse impacts of this growth. Open space will be protected, maintained and enhanced to form an integrated grid of green infrastructure. Development will be managed to achieve an overall reduction in flood risk and increase resilience to flood risk. Criteria for sustainable waste management are provided. And the Core Strategy requires contributions towards necessary infrastructure including the implementation of Harrow's Green Grid and Biodiversity Action Plan, improvements to the quality and accessibility of the Borough's parks, and junction improvements to enhance bus service efficiency.

3.2 Harrow & Wealdstone Area Action Plan

3.2.1 The Core Strategy forms the central component of Harrow's Local Development Framework. Its role is to establish the spatial vision for the Borough and a strategy for delivery. As one of the Core Strategy's delivery mechanisms, the Council in partnership with the Greater London Authority is committed to the preparation of an Area Action Plan development plan document for the Harrow & Wealdstone Intensification Area. Upon adoption the Area Action Plan will form a part of the statutory development plan, and will allocate sites for development and include a suite of area specific policies for the Intensification Area.

3.3 Site Allocations Development Plan Document

3.3.1 The Core Strategy identifies the broad distribution of growth between the Intensification Area and the rest of the Borough, and identifies (indicatively) on sub area key diagrams strategic future housing development sites. The role of the Site Allocations DPD is to ensure the delivery of plan-led growth by allocating sites outside of the Intensification Area¹ for housing and other types of development in accordance with the Borough's spatial strategy. As with the Area Action Plan, the Site Allocations DPD will upon adoption form a part of the statutory development plan for Harrow.

3.4 Development Management Policies Development Plan Document

3.4 The Core Strategy includes ten strategic policies comprising an overarching policy, covering a range of themes, and nine area-specific policies for each of the Core Strategy sub areas. The role of the Development Management Policies is to ensure a positive, supporting policy framework for developments that accord with the Borough's spatial strategy and to provide criteria for the consideration and assessment of any localised impacts arising from proposals. Again, the Development Management Policies DPD will upon adoption form a part of the statutory development plan for Harrow.

3.5 Habitats Regulations Assessment of the Harrow Core Strategy and the Submission Area Action Plan and Development Plan Documents

3.5.1 The Habitats Regulations Assessment of the Core Strategy concluded that the document would not have an adverse impact on the integrity of any European site. The conclusion was reached taking into account the mitigation measures built into the Strategy, (and into the higher level London Plan, which will influence other boroughs' plans and projects) together with established conservation and management techniques at European sites.

¹ Sites within the Intensification Area will be allocated through the Area Action Plan.

- 3.5.2 The 'issues and options' Harrow & Wealdstone Area Action Plan and the draft Site Allocations and Development Management Policies DPDs were published for public consultation between 13th May and 24th June 2011. A combined, draft Habitats Regulations Assessment of the AAP and other DPDs was published as part of the consultation exercise. Following the 'issues and options' document, the Council prepared a 'preferred option' Area Action Plan and this was the subject of an additional, separate public consultation exercise between 12th January and 23rd February 2012. The Habitats Regulations Assessment was updated in response to the additional detail contained in the 'preferred option' document and, again, this was published alongside the AAP as part of the consultation.
- 3.5.3 The Area Action Plan and the other two DPDs were published again for 'pre-submission' consultation from 27th July to 7th September 2012. A further, combined, draft Habitats Regulations Assessment was published, taking into account the changes to the documents following the earlier consultations, and was made available (along with the Sustainability Appraisal) as part of the pre-submission consultation. In response to representations received the Council has prepared a schedule of proposed minor modifications. This Habitats Regulations Assessment accompanies the submission of the AAP and DPDs to the Planning Inspectorate, for examination in public, by taking into account the schedule of proposed minor modifications. The role of this report is to set out the Council's assessment of any likely adverse impacts upon site integrity of the AAP and DPDs (AA task 1) and, if necessary, to proceed to carry out an appropriate assessment (AA task 2) and to consider mitigation or alternative solutions (AA task 3). It is not the role of this report to re-assess the implications of the minimum level of development attributed to the Borough as a whole or to the Intensification Area in particular as this is now established within the Core Strategy (2012) and London Plan (2011). Nor does this report seek to re-assess the policy provisions of these adopted development plan documents. Both the Core Strategy and the London Plan have been the subject of their own Habitats Regulations Assessments.

4. Habitats Regulations Assessment of the Submission Harrow & Wealdstone Area Action Plan

4.1 Summary of Submission Harrow & Wealdstone Area Action Plan

4.1.1 The Area Action Plan (AAP) contains the specific site allocations and development management policies needed to deliver the spatial strategy and strategic policies of the Borough's Core Strategy in relation to the Harrow & Wealdstone Intensification Area. The AAP applies to land within the boundary of the Intensification Area only. Upon adoption, the provisions of the Area Action Plan will be represented on the adopted policies map² (previously known as the proposals map). The AAP includes policies that are unique to the Intensification Area and, together with the relevant provisions of the Development Management Policies DPD and the London Plan (2011), will form part of the statutory development plan for the purposes of determining planning applications within the Area. The relevant provisions of the National Planning Policy Framework (2012) will also be a material consideration.

4.1.2 The Area Action Plan recognises that the Harrow & Wealdstone Intensification Area is not homogenous in character and therefore identifies seven character 'sub' areas. The Plan's site allocations are arranged by these sub areas and include provisions (such as requirements relating to design, access, infrastructure etc) which give effect to the broader objectives for the sub area in which it is located. The development capacity of the Intensification Area sub areas and their relevant site specific provisions are summarised below.

Wealdstone West: This sub area has an identified capacity to provide 1,135 homes and 1,410 jobs, with a strong emphasis on the provision of family housing. The area has an industrial heritage and this is reflected in the two, main previously-developed sites within this area. The AAP identifies an opportunity to enhance an existing publicly accessible area of open space and heritage complex, and through the redevelopment of one of the main development sites to reconfigure an existing private sports ground to provide new public open space as part of a 'green link'. On another site within the sub area, the AAP identifies the opportunity for a new secondary school with existing, inaccessible open space to be reconfigured and made available as a multi-functional asset for the new school and the community.

Wealdstone Central: This sub area focuses on Wealdstone district centre, already built-up and in fragmented ownership. This area therefore has more modest identified capacity to provide 195 homes and 190 jobs. Development sites in this sub area are tasked to deliver incremental additions to retail and employment floorspace, as well as

² To be represented on a detailed 'inset' map.

hotel and residential development. Public realm improvements and sustainable flood risk management outcomes are sought from the coordinated redevelopment of small, fragmented 'infill' and other sites within/surrounding Wealdstone district centre.

Wealdstone East: This sub area is characterised by small scale business and industrial activities, residential and civic functions. The AAP identifies capacity to provide 180 homes and 125 jobs. There is one main development site, to provide residential development alongside a retained leisure/sports complex and new public/shared open space. An existing Civic Amenity/Council Depot site is proposed for allocation to provide consolidated depot premises and improved/intensified waste management facilities.

Station Road: This sub area is contiguous with the linear section of the Intensification Area, linking Wealdstone to Harrow town centre. Sites in this area include the Civic Centre and a Station Road 'opportunity area', as well as two major sites within the Harrow town centre boundary. The AAP identifies capacity to provide 390 homes and 380 jobs. The area is also tasked to deliver major new retail floorspace, new public spaces and public realm enhancements that improve the pedestrian and cycling environment. A 'green grid' link connecting the Intensification Area to two major public open spaces crosses this sub area.

Harrow Western Gateway: This sub area relates to a part of Harrow town centre that is highly commercial in character and which is already undergoing substantial change. Three major sites are identified to provide a new supermarket (now underway), to secure the completion of a stalled development, and to secure the comprehensive or co-ordinated redevelopment of a parade of 1960s offices. The AAP identifies capacity to provide 426 homes and 610 jobs within this sub area.

Harrow Town Centre Central: This part of the Intensification Area relates to the primary shopping area and office core of Harrow town centre. Redevelopment opportunities to provide some additional retail floorspace, a diverse range of leisure and evening uses, as well as an increased residential presence within the town centre are identified. In all, the AAP identifies capacity to provide 445 homes and 140 jobs in this sub area. The potential to improve Lowands Recreation Ground, the only existing public open space within the town centre boundary, to increase its use and provide an outdoor performing arts space, is also sought within this sub area.

Harrow Town Centre East: This sub area forms a transition between the shopping and office core of Harrow town centre and the residential suburbs beyond the town centre boundary to the east. The sub area has a strong residential and (dated) office component to its character but also provides supporting uses, such as a library and car parking.

There are two main redevelopment sites within the sub area tasked to increase the residential presence in the town centre, as well as a health centre, replacement office floorspace, new public open space and improvements to the public realm. The AAP identifies a combined capacity within this sub area to provide 637 homes and 190 jobs.

4.1.3 In total, the Area Action Plan allocates sufficient previously-developed sites to deliver up to 3,408 homes and 3,045 jobs. An analysis of the principal impacts of the Harrow & Wealdstone Area Action Plan site allocations upon the identified European sites is set out at **Appendix F**.

4.1.4 The Area Action Plan contains twenty-two policies, as follows:

- Policy AAP 1: Development within Harrow town centre
- Policy AAP 2: Station Road
- Policy AAP 3: Wealdstone
- Policy AAP 4: Achieving a High Standard of Development throughout the Heart of Harrow
- Policy AAP 5: Density and Use of Development
- Policy AAP 6: Development Height
- Policy AAP 7: Creating a New Public Realm
- Policy AAP 8: Enhancing the Setting of Harrow Hill
- Policy AAP 9: Flood Risk and Sustainable Drainage
- Policy AAP 10: Harrow & Wealdstone District Energy Network
- Policy AAP 11: Provision of Open Space
- Policy AAP 12: Improving Access to Nature
- Policy AAP 13: Housing within the Heart of Harrow
- Policy AAP 14: Consolidation of the Wealdstone Strategic Industrial Location
- Policy AAP 15: Supporting the Business Sector in Wealdstone
- Policy AAP 16: Supporting the Service Sector in Harrow town centre
- Policy AAP 17: Primary Shopping Areas and the Primary Shopping Frontage
- Policy AAP 18: Secondary Frontages, Neighbourhood Parades and Non-Designated Retail Parades
- Policy AAP 19: Parking and Access within the Heart of Harrow
- Policy AAP 20: Harrow & Wealdstone Green Travel Plan
- Policy AAP 21: Harrow Waste Management Site
- Policy AAP 22: Supporting Site Assembly within the Heart of Harrow

4.1.5 An analysis of the principal impacts of the Harrow & Wealdstone Area Action Plan policies upon the identified European sites is set out at **Appendix G**.

4.2 Habitats Regulations Assessment - AA task 1: assessment of likely significant effects

4.2.1 The Area Action Plan is not directly connected with or necessary to the management of any European site. It is therefore necessary to consider, firstly, whether the Area Action Plan is likely to have a significant effect, either alone or in combination with other plans and projects, upon any European site.

4.2.2 There are no European sites in the Harrow & Wealdstone Intensification Area, nor are there any such sites elsewhere within the London Borough of Harrow or in any immediately adjoining borough. Only one site – Richmond Park – is within a 15 km radius of the Harrow & Wealdstone Intensification Area boundary. Other sites identified below are in excess 15km from the Intensification Area, but were identified in the Harrow Core Strategy Habitats Regulations Assessment as being within 15km of the Borough.

European Site	Status	Distance from Intensification Area boundary
Richmond Park	Special Area of Conservation (SAC)	13.5km
Wimbledon Common	Special Area of Conservation (SAC)	16.5km
Lee Valley	Special Protection Area (SPA)	18km
South West London Waterbodies	Special Protection Area (SPA)	17km

4.2.3 The features and environment of each of these European sites, together with their conservation objectives, are set out at Appendices A-D of this report. Natural England is in the process of setting out conservation objectives for all SACs and SPAs and are not currently available, except in draft form for the Lee Valley SPA which were included in the Habitats Regulations Assessment for the Lee Valley Park Development Framework published November 2009. In the absence of formulated conservation objectives for these sites, those identified in the Habitats Regulations Assessment screening report for the replacement London Plan (2009) have been used.

4.2.4 Having regard to the primary and non-primary qualifying features of the four sites identified, it is necessary to consider the potential effects of the Area Action Plan upon the key environmental conditions of each site to maintain the habitat's integrity, and the significance of these effects.

Richmond Park and Wimbledon Common – Stag Beetle habitat

4.2.5 In relation to the Stag Beetle populations at Richmond Park and Wimbledon Common, the principal management technique for the

protection of their habitat is the continued maintenance of woodland pastures, leaving existing decaying timber *in situ* and allowing new decaying timber habitats to form. The Harrow and Wealdstone Area Action Plan would have no direct or indirect impact upon the continuation of this management technique for the preservation and renewal of the Stag Beetle's habitat at these sites.

- 4.2.6 Both sites are recognised as being vulnerable to human recreational activity and the consequences for the Stag Beetle's habitat in terms of damage and general wear & tear within the woodland areas. The potential for population growth in the Borough to lead to increased use of Richmond Park and/or Wimbledon Common for recreational activity was considered as part of the Harrow Core Strategy Habitats Regulations Assessment. It concluded that the likelihood of an adverse impact upon site integrity arising from the Core Strategy upon these two European sites can be excluded.
- 4.2.7 The Area Action Plan allocates sufficient sites to deliver 3,408 homes which, together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), results in combined potential delivery within the Intensification Area of 3,681 homes over the plan period.
- 4.2.8 Richmond Park covers an area of 845ha and Wimbledon Common covers an area of 350ha. Both may be regarded as 'regional parks' likely to attract visitors from a wider catchment than their immediate locality. The possibility that high demand for outdoor recreation from within the Intensification Area could lead to additional visitor numbers to these sites cannot therefore be excluded. However, as noted above, Richmond Park is some 13.5km distance from the Intensification Area boundary and Wimbledon Common is 16.5km away. Within the London Borough of Harrow there are opportunities for 'access to nature' recreation at Stanmore Common (49ha), Stanmore Country Park (32ha), Bentley Priory Open Space (66ha) and Harrow Weald Common (19ha) (all in the Green Belt). These sites are readily accessible by public transport from the Intensification Area. It may also be noted that the Area Action Plan site allocations make provision for open space to be reconfigured and made accessible to the community on two allocated sites, and for additional open space adjacent to an existing park on another allocated site.
- 4.2.9 In the surrounding area, within 1-2km of the Borough boundary, there are further such recreational opportunities: Fryent Country Park (100ha) and the Welsh Harp (100ha) to the south east, Aldenham Country Park (134ha) to the north east and Ruislip Woods & Common (305ha) to the west. Further a field, major regional park alternatives include Hyde Park (142ha), Regents Park (166ha) and Hampstead Heath (320ha). These are also readily accessible by public transport from the Intensification Area.

- 4.2.10 A number of the Area Action Plan's policies promote the provision of new or reconfigured open space within the Intensification Area. In particular, Policies AAP 3 and AAP 4 seek the implementation of Green Grid serving the Intensification Area whilst Policy AAP 11 requires very large (500 dwellings +) to include local or pocket parks and provides criteria for the reconfiguration of open space to enhance accessibility. Policy AAP 12 seeks opportunities to improve residents' access to nature. These policies therefore enable enhanced access to existing open space and the provision of new space, and so help to alleviate visitor pressure upon the European sites.
- 4.2.11 The policies of the Area Action Plan also help to protect existing open space from development by giving strong direction for development to make efficient use of previously developed land within the Intensification Area. In particular Policy AAP 5 requires the development of allocated sites to conform with the site specific guidance contained in the AAP and for residential development to comply with London Plan density ranges. Policy AAP 13 reaffirms the housing delivery target for the Intensification Area and Policy AAP 14 will enable surplus strategic industrial land to be made available to meet other development needs. Policy AAP 22 commits the Council to use compulsory purchase powers where necessary to enable development within the Intensification Area. These policies therefore negate the potential for development pressure on existing open space, contributing to its retention as a local recreational resource and consequently helping to alleviate visitor pressure upon the European sites.
- 4.2.12 Other policies in the Area Action Plan would not affect human recreational activity at these two European sites.
- 4.2.13 The Area Action Plan site allocations and development management policies will deliver on Core Strategy objectives for sustainable growth within the Harrow & Wealdstone Intensification Area. In particular, the Area Action Plan will ensure that new development makes provision for residents', employees' and visitors' day-to-day open space needs within the Intensification Area. The Area Action Plan will also facilitate the realisation of development within the part of the highest public transport accessibility levels, meaning that residents and visitors will have access to open space and natural environments in other parts of Harrow and adjoining boroughs. Taking these considerations together, it is found that the number of additional visits to Richmond Park and Wimbledon Common is unlikely to be substantial. The impact of such additional visits that do occur on the stag beetle can, it is considered, be controlled by the implementation of suitable management plans and techniques for the protection of decaying timber habitats within the woodland areas of the sites.

4.2.14 On this evidence it is concluded that the likelihood of an adverse impact upon site integrity arising from the Area Action Plan upon these two European sites can be excluded.

4.2.15 As noted above, the Area Action Plan together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), results in combined potential delivery within the Intensification Area of 3,618 homes over the plan period 2009-2026. The housing capacity of the rest of the Borough is 3,681 homes (comprising sites allocated within the Site Allocations DPD, completions and pipeline supply as defined above). Therefore the combined housing output of the Area Action Plan and Site Allocations DPD is 7,350 homes over the plan period 2009-2026.

4.2.16 Harrow's Core Strategy provides for the delivery of 6,050 homes over the plan period. However this delivery figure, and the disaggregated figures for the Harrow & Wealdstone Intensification Area (2,800 homes) and the rest of the Borough (3,250 homes), are minimum targets. The combination of the development allocations in the Area Action Plan and Site Allocations DPD, together with completions and pipeline supply, exceeds the Core Strategy minimum target for the plan period by 1,300 homes and therefore raises the possibility of higher than expected demand for outdoor recreation at the European sites. However with the mitigation provided by the Core Strategy and the availability of other local sites for outdoor recreation, described above and considered as part of the Habitats Regulations Assessment of the Core Strategy, the combined number of additional visits is considered unlikely to be substantial. The impact of such additional visits that do occur can be addressed by the established conservation management techniques at the sites.

4.2.17 The Habitats Regulations Assessment screening report (2009) for the draft replacement London Plan recognises, in respect of a number of European sites across London, that "...increased visitor accessibility and disturbance are considered to be the main issue for consideration, reflecting one of the key themes of the London Plan to accommodate growth but only on the basis that the policies support the improving quality of Londoners' lives..." (para 3.2.6). The report goes on to recommend that the draft replacement London Plan Policy 3.3 *Increasing housing supply* and certain opportunity/intensification areas be the subject of lower tier assessment³.

³ "It will be appropriate to consider relying on the Habitats Regulations Assessments of lower tier plans, in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

A) The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas

B) The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid

4.2.18 The draft replacement London Plan Habitats Regulations Assessment screening report (2009) also recommends lower tier assessment of the South Wimbledon/Colliers Wood Intensification Area in relation to Richmond Park and Wimbledon Common and this will inform the relevant LDF and any specific, local mitigation measures required. In terms of the overall housing growth of London and the south east, considered as part of the Habitats Regulations Assessment of Harrow's Core Strategy, the extent of additional visitor pressure will be diluted by the availability of existing and new alternative open spaces provided-for in the Site Allocations DPD (see section 5 below), whilst on-site management will mitigate the impact of increased visitor numbers upon the habitat of the stag beetle.

4.2.19 The Area Action Plan gives effect to the principal component of Harrow's spatial strategy, already assessed as part of the Core Strategy. Any increased recreational pressure upon Richmond Park and Wimbledon Common associated with the development of the Area Action Plan site allocations, together with any windfall development over the plan period provided-for by the policies of the Area Action Plan, will be mitigated by the availability of alternative open spaces, enhancement projects and new provision.

4.2.20 Policies in the London Plan form part of the development plan for all London boroughs and will therefore be applied alongside Harrow's Area Action Plan in the determination of planning applications. The Habitats Regulations Assessment screening report (2009) for the draft replacement London Plan recognises, in respect of a number of European sites across London, that "...increased visitor accessibility and disturbance are considered to be the main issue for consideration, reflecting one of the key themes of the London Plan to accommodate growth but only on the basis that the policies support the improving quality of Londoners' lives..." (para 3.2.6). London Plan policies seek to preserve and integrate green infrastructure across London, and require development to make provision for access to nature together with the sport and recreational needs of the growing population. As other boroughs' LDF documents are required to be in general conformity with the London Plan, the 'in combination' effect will be the mitigation of visitor pressure by the retention and provision of new recreation opportunities throughout London. On-site management will continue to mitigate the impact of any increased visitor numbers at the European sites upon the habitat of the stag beetle.

adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and
C) The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy" Revised Draft Guidance *The Habitats Regulations Assessment of Local Development Documents* David Tyldesley and Associates for Natural England, February 2009

4.2.21 It is therefore concluded that the Area Action Plan, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Richmond Park and Wimbledon Common Special Areas of Conservation.

Wimbledon Common – Northern Atlantic wet heathland and European dry heathland

4.2.22 Although not the primary reason for the designation of the site, the heathlands at Wimbledon Common are also of conservation interest and are susceptible to recreational pressure (trampling) and deterioration of air quality.

4.2.23 For the reasons identified above and with management plans to safeguard the heaths from trampling, it is not considered that the Area Action Plan either alone or in combination with other plan and projects would have an adverse impact upon site integrity in terms of recreational pressure.

4.3.24 Air pollution poses a risk to heathland habitats through nitrogen deposition and acidification; the major contributor to air pollution is vehicle emissions. Harrow's Air Quality Action Plan (2004) provides policies and proposals, grouped into the following sections, to control air quality in the Borough:

- reducing emissions from vehicles;
- reducing road traffic;
- encouraging walking and cycling as means of travel;
- encouraging development that does not impact upon air quality; and
- public information and education.

4.2.25 The Area Action Plan gives effect to the overall spatial strategy set out in the Core Strategy by providing-for the delivery of growth within the Harrow & Wealdstone Intensification Area. Among the objectives of the spatial strategy are to co-ordinate development and public transport to promote more sustainable patterns of land use. By directing housing and jobs growth to the part of the Harrow with highest public transport accessibility levels, the strategy's principal benefit to air quality in London is to deliver growth that is less reliant on private vehicle use than existing development in other parts of the Borough.

4.2.26 The Area Action Plan gives effect to the spatial strategy by allocating sites for development to deliver 3,408 homes and 3,045 jobs. The mix of uses identified in the Plan, providing opportunities for employment, retail, leisure and access to services alongside housing growth, should reduce the need to travel for residents within the Intensification Area and be highly accessible by public transport for residents elsewhere in

the Borough. The policies of the Area Action Plan seek to reinforce the potential of the Intensification Area to deliver development that achieves more sustainable patterns of land use through appropriate density and seeking to deliver appropriate land use mix. Other provisions of the Area Action Plan should also benefit air quality by securing improvements to the public realm that encourage walking and cycling, by requiring development to connect to a district energy network where feasible, and to encourage 'car free' development. The Area Action Plan site allocations and policies will deliver growth without a proportionate increase in air pollutants. Taken together with the distance from Wimbledon Common it is not considered likely that the Area Action Plan, on its own, would significantly effect the Wimbledon Common heaths.

4.2.27 In terms of 'in combination' effects, the policies of the Area Action Plan (and the Development Management Policies DPD where these are applicable to the Intensification Area) are in general conformity with and supplement the policies of the London Plan which aim to deliver a modal shift in emphasis away from car use and in particular encourage more sustainable (non motorised) modes. Together with the policy provisions of other London boroughs (which must also be in general conformity with the London Plan) these should therefore contribute to regional air pollution reduction. Planning policies covering the boroughs containing European sites will need to build-in specific mitigation measures to control vehicle emissions within the vicinity of the site, informed by the relevant local Habitats Regulations Assessment.

4.2.28 It is therefore concluded that the Area Action Plan, on its own and in combination with other plans and projects, would not be likely to lead to adverse impact upon the non-primary conservation interest of the Wimbledon Common Special Area of Conservation.

Lea Valley and South West London Water Bodies – Gadwell, Shoveler and Bittern habitat

4.2.29 Both the Lea Valley and South West London Water Bodies European sites are identified as wintering habitats for the Gadwell, Shoveler and Bittern bird populations. Both sites are vulnerable to human recreational activity and associated disturbance to nesting birds, the extraction of water and deterioration of water quality. Therefore the principal management techniques are the control of water extraction, in order to safeguard water levels and quality, and control of recreational activity. The Area Action Plan would have no direct or indirect impact upon the continuation of these management techniques.

4.2.30 The potential for population growth in the Borough to lead to increased use of the Lea Valley and the South West London Water Bodies has already been considered as part of the Habitats Regulations

Assessment of the Harrow Core Strategy. It concluded that the likelihood of an adverse impact upon site integrity arising from the Core Strategy upon these two European sites can be excluded.

- 4.2.31 The housing capacity of the Area Action Plan site allocations together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction) will deliver 3,681 homes within the Intensification Area. The Site Allocations DPD, together with recent completions and pipeline supply, will deliver 3,818 homes throughout the rest of the Borough. Therefore, as noted under the assessment for the Richmond Park and Wimbledon Common sites above, the combined housing output of the Area Action Plan and Site Allocations DPD is 7,350 homes over the plan period 2009-2026, some 1,300 homes in excess of the Core Strategy minimum housing target.
- 4.2.32 The South West London Water Bodies comprise a total area of 830ha and, in addition to their primary function of public water supply, are used recreationally for angling, sailing and bird watching. Lee Valley covers an area of 450ha and is used for a variety of formal and informal recreational activity including athletics, golf, horse riding, ice skating, fishing, cycling, bird watching and camping. Lee Valley is a regional park likely to attract visitors from a wider catchment area than its immediate locality. The possibility that high demand for outdoor recreation from within the Intensification Area could lead to additional visitor numbers to these sites cannot therefore be excluded. The South West London Water Bodies provide for more specific, water-focused recreational activity and as the sites are privately owned do not automatically provide general public access; nevertheless, the possibility of additional visits arising from population growth in Harrow also merits further consideration.
- 4.2.33 As noted above for Richmond Park and Wimbledon Common, there are within Harrow opportunities for alternative 'access to nature' recreation at Stanmore Common (49ha), Stanmore Country Park (32ha including Forty Acre Pond), Bentley Priory Open Space (66ha including Summerhouse Lake and Boot Pond) and Harrow Weald Common (19ha) (all in the Green Belt). These sites are readily accessible by public transport from the Intensification Area. In the surrounding area, within 1-2km of the Borough boundary, there are further such recreational opportunities: Fryent Country Park (100ha) and the Welsh Harp (100ha including the Brent Reservoir) to the south east, Aldenham Country Park (134ha including a 65 acre lake) to the north east and Ruislip Woods & Common (305ha including Ruislip Lido) to the west.
- 4.2.34 Further a field, major regional park alternatives include Hyde Park (142ha), Regents Park (166ha) and Hampstead Heath (320ha). These are also readily accessible by public transport from the Intensification Area.

4.2.35 As noted under the assessment for the Richmond Park and Wimbledon Common sites above, the Area Action Plan contains policies that would indirectly help to safeguard open space by enabling development needs to be met on previously-developed land (Policies AAP 5, AAP 13, AAP 14 and AAP 22). Other policies in the AAP promote the provision of new or reconfigured open space (Policies AAP 3, AAP 4, AAP 11 and AAP 12), but it is unlikely that these would lead to the delivery of substantial water bodies for recreational use.

4.2.36 Policy AAP 4 of the Area Action Plan requires development to incorporate sustainable building and site design, taking a long-term view of energy and water efficiency. Policy AAP 9 gives preference to sustainable building design measures that reduce demand for potable (mains) water. However, the reservoirs at Lea Valley and at the South West London Water Bodies are owned by Thames Water, which serves much of the capital excluding north-west London. Harrow and adjoining parts of north-west London are served by Veolia Water (formerly Three Valleys Water) which sources ground water from a number of locations within its wider operating area, and from rivers (notably the River Thames)⁴. Therefore Policies AAP 4 and AAP 9 will have no significant impact other than helping to reduce the risk of mains water needing to be supplied from other water company areas in the event of any shortage in the Veolia Water supply region.

4.2.37 Many of the Plan's other policies are assessed as having no impact and a small number are identified as helping to potentially alleviate visitor pressure. Together with the availability of local alternative sites for equivalent outdoor recreation the number of additional visits to the Lee Valley Regional Park and South West London Water Bodies is unlikely to be substantial. The impact of such additional visits that do occur on the wintering habitats of the Gadwall, Shoveler and Bittern bird species can, it is considered, be controlled by the implementation of suitable management plans and techniques for the surface water areas and supporting marginal habitats of both sites.

4.2.38 On this evidence it is considered that the likelihood of an adverse impact upon site integrity arising from the Area Action Plan upon these two European sites can be excluded.

4.2.39 It remains, therefore, to consider the 'in combination' effects of other plans and projects.

4.2.40 In terms of recreational pressure, the London Plan Habitats Regulations Assessment screening report (2009) recommends lower tier assessment of the Upper & Lower Lea Valley, Haringey

⁴ The Plan forecasts the demand/supply balance for water to 2030, assuming no increase in the quantity of water extracted from the environment in line with the Environment Agency's position on water extraction licenses.

Heartlands and Wood Green Intensification Areas in relation to the Lea Valley and this will inform the relevant DPDs and any specific, local mitigation measures required. In terms of the overall housing growth of London and the south east, the extent of additional visitor pressure will be diluted by the availability of existing and new alternative open spaces provided for in DPDs.

4.2.41 The policies of the Area Action Plan are in general conformity with and supplement the policies of the London Plan. Together with the policy provisions of other London boroughs (which must also be in general conformity with the London Plan), the London Plan and Area Action Plan policies will therefore operate 'in combination' to help mitigate visitor pressure by the retention and provision of new recreation opportunities throughout London.

4.2.42 As noted for Richmond Park and Wimbledon Common above, the number of additional visits associated with the combined housing growth to be delivered through the Area Action Plan and Site Allocations DPD is unlikely to be substantial. The impact of such additional visits that do occur can be addressed by the established conservation management techniques at the sites.

4.2.43 In terms of water levels and quality, as the reservoirs concerned do not supply Harrow, and will not therefore be affected by the Area Action Plan, there is no need to consider any 'in combination' impacts of other plans and projects.

4.2.44 It is therefore concluded that the Area Action Plan, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Lea Valley and South West London Water Bodies Special Protection Areas.

Cross-Cutting Effects – Climate Change

4.2.45 A cross cutting issue affecting all sites is that of climate change. UK climate change projections, for London, forecast an increase in mean summer temperature of 2.7 degrees, an increase in mean winter rainfall of 15 per cent and a decrease in mean summer rainfall of 18 per cent over a 1961-1990 baseline⁵. In short, the capital is likely to experience hotter, drier summers and mild, wetter winters.

4.2.46 There are a range of potential direct consequences for these European sites: drier summers could see increased demand for water extraction at the South West London Water Bodies and Lea Valley, could dry the decaying timber habitat of the stag beetle, or lead to increased incidence of woodland and heathland fires. Wetter winters could lead to increased incidence of flooding at European sites. As

⁵ The London Plan Consultation draft replacement plan (October 2009)

temperatures and climate conditions change, the ability of species to find appropriate alternative habitats is likely to be prevented by urban barriers and fragmentation of natural spaces in London, whilst adaptation to new environmental conditions could be impeded by the pace of climate changes.

4.2.47 It is now generally accepted that climate change is inevitable, but that there remains scope to manage the degree of change and to mitigate some of the environmental consequences. Chapter 5 of the London Plan (2011) contains policies to tackle climate change and its effects, including a target to reduce London's carbon dioxide emissions by 60% (below 1990 levels) by 2025, a requirement for new development to follow the energy hierarchy, and a requirement for DPDs to include policies on sustainable building design (in addition to London plan policies on sustainable design that are directly applicable to proposals for major development).

4.2.48 The Area Action Plan will give effect to Harrow's spatial strategy to direct major growth to the central part of the Borough with the highest public transport accessibility levels. The Area Action Plan site allocations demonstrate that the minimum levels of housing and job growth set by the Core Strategy for the Intensification Area can be met and exceeded. In so doing the Area Action Plan will help to realise the desired outcomes of the spatial strategy: to ensure that growth can be accommodated in a way that reduces the need to travel; to encourage use of more sustainable modes of transport where travel remains necessary; and to support the feasibility of a local heat & power network. By providing a clear framework for development within the Intensification Area the Area Action Plan will help to realise investment in infrastructure, including the provision of new and improved open space.

4.2.49 The Area Action Plan includes a number of policies which, directly or indirectly, seek to contribute to the London wide target for carbon dioxide reduction. Policies AAP 1, AAP 2, AAP 3 and AAP 7 seek environmental, permeability and safety improvements that will encourage pedestrian and cyclist activity. Policy AAP 4 seeks opportunities for the implementation of Green Grid projects, as well as requiring development to incorporate sustainable building and site design. Policy AAP 10 incorporates requirements that will support the installation of a district energy network within the Intensification Area. Policies AAP 15 and AAP 16 support business and service sector development that will enable growth in local employment opportunities, and in so doing will help to mitigate out-commuting by residents to employment opportunities elsewhere. Policies AAP 19 and AAP 20 will contribute to a modal shift in emphasis away from car use by prioritising sustainable modes and implementing an area-wide Green Travel Plan. And Policy AAP 21 gives effect to the safeguarding of the existing Civic Amenity site, and to the related site allocation of the adjoining Depot site for waste management, thus

enabling waste arising within the Borough to be treated as close to source as possible (and therefore avoiding the need to transport large quantities of waste to treatment sites or landfill elsewhere).

4.2.50 The Area Action Plan site allocations and policies will therefore help to accommodate growth in the Borough in manner that would have a more limited impact upon on climate change than unmanaged development. In combination with the London Plan and other boroughs' plans and projects, the Area Action Plan may help to mitigate the consequences of climate change upon European sites.

Findings of AA task 1: assessment of likely significant effects

4.2.51 This Habitats Regulations Assessment has considered the potential reach of Harrow's Area Action Plan in relation to European sites and has identified only one site within 15km distance of the Intensification Area boundary. Three other sites are in the range of 15-20km away but are nevertheless assessed for consistency with the Habitats Regulations Assessment of the Harrow Core Strategy (being within 15km of the Borough boundary).

4.2.52 The Area Action Plan will, upon adoption, work in combination with the Site Allocations DPD to ensure the delivery of the Borough's development needs and spatial strategy set out in Harrow's Core Strategy. The Area Action Plan allocates sufficient previously-developed land to provide 3,408 homes which, together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), will contribute 3,681 homes to the Core Strategy's housing delivery target for the plan period 2009-2026.

4.2.53 The Area Action Plan has been assessed for possible impacts on the identified European sites. Taking into account the mitigation measures built into the Core Strategy (and into the higher level London Plan, which will influence other boroughs' plans and projects) and established conservation & management techniques at European sites, it is concluded that the Area Action Plan site allocations and policies would not have an adverse impact on the integrity of any European site. This conclusion has been reached having regard to the conservation objectives of the sites concerned and their vulnerabilities which comprise visitor pressure, water consumption and water quality, and - as a cross-cutting issue - climate change.

4.2.54 The Area Action Plan includes a small number of provisions to re-present retail and employment designations on the Harrow adopted policies map. These represent modifications to existing designated areas and, in the case of neighbourhood parades and primary shopping areas, give effect to new designations. However they do not materially affect the scale and locations of development already provided-for and assessed as part of the Harrow Core Strategy. It is

not considered that any other components of the Area Action Plan are material in terms of the overall assessment of the plan's impact upon the European sites.

4.2.55 It is therefore not necessary to progress beyond AA task 1 (screening) to full appropriate assessment of the plan.

4.3 AA task 2: appropriate assessment and effect on site integrity

4.3.1 Not required – see above.

4.4 AA task 3: mitigation measures and alternative solutions

4.4.1 Not required – see above.

5. Habitats Regulations Assessment of the Submission Site Allocations DPD

5.1 Summary of Submission Site Allocations DPD

5.1.1 The Site Allocations DPD contains the specific site allocations needed to deliver the spatial strategy and strategic policies of the Harrow Core Strategy (2012). The DPD applies to land throughout the Borough except for the Harrow & Wealdstone Intensification Area. Where specific site allocations are needed to give effect to the Core Strategy in respect of the Intensification Area, these will be contained within the Area Action Plan. Upon adoption, the provisions of the Site Allocations DPD will be represented on the adopted policies map (previously known as the proposals map) and will form part of the development plan for the purposes of making decisions on relevant planning applications.

5.1.2 The Site Allocations DPD makes provision for retail-led mixed-use development (chapter 2), employment-led mixed use development (chapter 3), residential development (chapter 4), development on strategic previously developed sites in the Green Belt (chapter 5), major new open space opportunities (chapter 6) and sites for other types of development/uses (chapter 8). The allocated sites included in the DPD will supersede the proposal sites listed in the Harrow Unitary Development Plan (2004).

5.1.3 The Site Allocations DPD is also used as the appropriate vehicle for making required changes to the boundaries/extent of policy designations identified on the adopted policies map. These changes comprise amendments to designated shopping frontages in certain town centres (chapter 2), rationalisation of the boundaries of some industrial and business use areas (chapter 3), revisions/corrections to open space boundaries (chapter 6) and updating of the boundaries/classification of some Sites of Importance for Nature Conservation (chapter 7). A small number of sites not previously designated as open space (chapter 6) and new Sites of Importance for Nature Conservation are also included. The DPD also identifies the extents of neighbourhood parades – a new retail policy designation introduced in the Core Strategy.

Retail (Chapter 2)

5.1.4 With the proposed minor modifications, six sites are identified in the Site Allocations DPD for new retail development within or at the edge of town centres located outside of the Intensification Area. All but two sites are suitable for a mix of uses which includes residential. All sites are previously developed. The combined, estimated capacity of the allocated sites in this chapter is 6,500m² retail and 220 homes.

- 5.1.5 Revisions to shopping policy designations relate to specific parts of the primary and secondary retail frontages within North Harrow, Pinner, South Harrow, Wealdstone and Stanmore district centres. The frontages relate to planning policies which seek to manage the balance of retail and other town centre uses through decisions on planning applications for change of use. The changes are based on recommendations made in the Harrow Retail Study (2009) which forms a part of the evidence base for the DPDs.
- 5.1.6 Harrow's Core Strategy includes a list of neighbourhood parades which, although not a part of the main town centre network, nevertheless have an important role to play in providing 'walk-to' shops and services. The Site Allocations DPD gives effect to this list by identifying the premises which comprise each of the neighbourhood parades.
- 5.1.7 The National Planning Policy Framework (2012) defines the primary shopping area as the part of a town centre in which retail development is concentrated. For centres with a dual retail and other role – Harrow town centre and Wealdstone, South Harrow, Rayners Lane, Pinner and Stanmore district centres – the Site Allocations DPD seeks to identify the extent of the primary shopping area.

Employment (Chapter 3)

- 5.1.8 Five sites (EM1-EM5) are identified in the Site Allocations DPD for employment-led mixed use redevelopment to include residential. All sites are previously developed. The combined, estimated capacity of the allocated sites is 18,184m² indicative employment floorspace and 493 homes.
- 5.1.9 To reflect losses that have occurred through residential development, the Site Allocations DPD amends the extent of allocated business and industrial use areas at Honeypot Lane, Brember Road and Northolt Road. It also removes an existing pub and retail frontage on the south side of Northolt Road from the allocated business use area.

Housing (Chapter 4)

- 5.1.10 With the proposed minor modifications, twenty-two sites are identified in the Site Allocations DPD for predominantly or wholly residential development. The combined estimated capacity of the allocated sites is 586 homes.
- 5.1.11 The housing capacity of sites allocated in preceding and subsequent chapters of the DPD totals 1,011 homes⁶. Harrow's Annual Monitoring Reports show that 792 homes were completed on sites outside of the

⁶ Comprising: 172 homes on retail-led mixed use development sites; 493 homes on employment led mixed use development sites; 239 homes on strategic, previously-developed sites within the Green Belt; and 107 homes on sites within the 'other' chapter.

Intensification Area during the period 2009/10 to 2010/11, and provisional data shows a further 401 homes were completed during the most recent monitoring year 2011/12. Provisional data for the period 2011/12 also shows a pipeline supply of 879 homes, comprising developments with planning permission but not started and developments under construction, on sites outside of the Intensification Area. (All figures net).

5.1.12 Projected housing delivery over the Core Strategy plan period of 2009 to 2026, on sites covered by the Site Allocations DPD, is therefore 3,669 net new homes. This exceeds the Core Strategy minimum delivery target for development outside of the Intensification Area by 419 homes. A detailed housing schedule is set out at Appendix 1 of the DPD.

Strategic Previously-Developed Sites in the Green Belt

5.1.13 The Core Strategy identifies four strategic previously developed sites within the Green Belt. The Site Allocations DPD explains the strategic significance of each of these sites and gives them definition by identifying their boundaries and development constraints. With the proposed minor modifications, the combined estimated residential capacity of the allocated Green Belt sites is 239 homes.

Open Space

5.1.14 With the proposed minor modifications, the Site Allocations DPD identifies six sites as major new public open space opportunities. Three of them are allocated for community outdoor sports use, a further three are allocated as sites to provide accessible natural and semi-natural greenspace. Their combined site area is 42.6 hectares.

5.1.15 This chapter also makes revisions to existing open space boundaries and applies the open space designation to a number of other sites, following a comprehensive Borough-wide audit undertaken for Harrow's PPG 17 Study (2011). This comprises a total of 71 sites.

Biodiversity

5.1.16 The Harrow adopted policies map delineates Sites of Importance for Nature Conservation. Since the UDP map was published in 2004 the boundaries of 26 sites have been revised and 13 new sites have been identified. This chapter details the revised and new sites to be represented on the adopted policies map. Unchanged Sites of Importance for Nature Conservation are transferred directly from the UDP proposals map to the adopted policies map.

Other

5.1.17 With the proposed minor modifications, which resulted in one site being transferred from the retail chapter, seven further sites are identified in the Site Allocations DPD for redevelopment and are included in this chapter as they do not relate to any other chapter within the DPD. Two sites make provision for access to open space which is not currently publicly accessible. One site supports community access to school sport and open space facilities. One allocation is for arts and leisure development one is for medical/community redevelopment; both of these are on previously developed land. One allocation seeks to safeguard existing Gypsy and Traveller provision. Only two of the allocations include provision for residential and their combined capacity is 59 homes. The site transferred from the retail chapter is allocated for community uses with enabling retail and/or residential development.

5.1.18 An analysis of the principal impacts of the provisions of the Site Allocations DPD upon the identified European sites is set out at **Appendix H**.

5.2 Habitats Regulations Assessment - AA task 1: assessment of likely significant effects

5.2.1 The Site Allocations DPD is not directly connected with or necessary to the management of any European site. It is therefore necessary to consider, firstly, whether the Site Allocations DPD is likely to have a significant effect, either alone or in combination with other plans and projects, upon any European site.

5.2.2 There are no European sites in Harrow nor are there any such sites in any immediately adjoining borough. However the following sites are within a 15km radius of Harrow's Borough boundary:

European Site	Status	Distance from Harrow boundary
Richmond Park	Special Area of Conservation (SAC)	12.5km
Wimbledon Common	Special Area of Conservation (SAC)	15km
Lee Valley	Special Protection Area (SPA)	15km
South West London Waterbodies	Special Protection Area (SPA)	15km

5.2.3 The features and environment of each of these European sites, together with their conservation objectives, are set out at Appendices A-D of this report. Natural England is in the process of setting out conservation objectives for all SACs and SPAs and are not currently available, except in draft form for the Lee Valley SPA which were included in the Habitats Regulations Assessment for the Lee Valley

Park Development Framework published November 2009. In the absence of formulated conservation objectives for these sites, those identified in the Habitats Regulations Assessment screening report for the draft replacement London Plan (2009) have been used.

- 5.2.4 Having regard to the primary and non-primary qualifying features of the four sites identified, it is necessary to consider the potential effects of the Site Allocations DPD upon the key environmental conditions of each site to maintain the habitat's integrity, and the significance of these effects. Consideration of effects will focus on the housing capacity provided-for in the DPD, taking into account recent completions and pipeline supply (sites with planning permission but not started and sites under construction). This is because residential development is considered to be the principal component of the DPD with the greatest potential to generate visitor pressure, demand for water and to influence climate change. Other components of the DPD relate to the visual representation on the Harrow adopted policies map of planning policies which are separately assessed as part of the Development Management Policies DPD in the following section.

Richmond Park and Wimbledon Common – Stag Beetle habitat

- 5.2.5 In relation to the Stag Beetle populations at Richmond Park and Wimbledon Common, the principal management technique for the protection of their habitat is the continued maintenance of woodland pastures, leaving existing decaying timber *in situ* and allowing new decaying timber habitats to form. The Site Allocations DPD would have no direct or indirect impact upon the continuation of this management technique for the preservation and renewal of the Stag Beetle's habitat at these sites.
- 5.2.6 Both sites are recognised as being vulnerable to human recreational activity and the consequences for the Stag Beetle's habitat in terms of damage and general wear & tear within the woodland areas. The potential for population growth in the Borough to lead to increased use of Richmond Park and/or Wimbledon Common for recreational activity was considered as part of the Core Strategy Habitats Regulations Assessment. It concluded that the likelihood of an adverse impact upon site integrity arising from the Core Strategy upon these two European sites can be excluded.
- 5.2.7 The Site Allocations DPD allocates sufficient sites to deliver 1,597 homes which, together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), results in combined potential delivery outside of the Intensification Area of 3,669 homes over the plan period 2009-2026.
- 5.2.8 Richmond Park covers an area of 845ha and Wimbledon Common covers an area of 350ha. Both may be regarded as 'regional parks' likely to attract visitors from a wider catchment than their

immediate locality. The possibility that high demand for outdoor recreation from the allocated sites and other sources throughout the Borough could lead to additional visitor numbers to these sites cannot therefore be excluded. However, as noted above, Richmond Park is some 12.5km distance from the Borough boundary and Wimbledon Common is 15km away. Within the London Borough of Harrow there are opportunities for 'access to nature' recreation at Stanmore Common (49ha), Stanmore Country Park (32ha), Bentley Priory Open Space (66ha) and Harrow Weald Common (19ha) (all in the Green Belt). These sites are readily accessible by public transport within the Borough. It may also be noted that the Site Allocations DPD makes provision for the delivery of an additional nature reserve (0.9ha), an extension to Bentley Priory Open Space (3.3ha), an extension to Stanmore Country Park (25ha), and for two new publicly accessible natural/semi-natural greenspace sites (6.9ha & 3.14ha).

5.2.9 In the surrounding area, within 1-2km of the Borough boundary, there are further such recreational opportunities: Fryent Country Park (100ha) and the Welsh Harp (100ha) to the south east, Aldenham Country Park (134ha) to the north east and Ruislip Woods & Common (305ha) to the west. Further afield, major regional park alternatives include Hyde Park (142ha), Regents Park (166ha) and Hampstead Heath (320ha).

5.2.10 Harrow's Core Strategy seeks new open space as part of major development proposals, and the implementation of Green Grid & Biodiversity Action Plan projects to enhance access to open space and nature. As noted above, the Site Allocations DPD makes provision for a total of 39 hectares additional 'natural' public open space and a further two major opportunities for community outdoor sport use (28 hectares) and two smaller opportunities for local parks. These components of the Site Allocations DPD will support the delivery of the open space requirements of the Core Strategy.

5.2.11 The Site Allocations DPD housing allocations will contribute to the delivery of Core Strategy objectives for growth throughout the rest of the Borough (beyond the Harrow & Wealdstone Intensification Area), with access to local green infrastructure. The Core Strategy requires development to contribute to new open space provision and enhancement projects, and this will help to mitigate the possibility of higher than expected demand for outdoor recreation resulting from the housing capacity of the allocated sites (the capacity of which exceeds the Core Strategy *minimum* target). Taking these considerations together, it is found that the number of additional visits to Richmond Park and Wimbledon Common is unlikely to be substantial. The impact of such additional visits that do occur on the stag beetle can, it is considered, be controlled by the implementation of suitable management plans and techniques for the protection of decaying timber habitats within the woodland areas of the sites.

5.2.12 On this evidence it is concluded that the likelihood of an adverse impact upon site integrity arising from the Site Allocations DPD upon these two European sites can be excluded.

5.2.13 As noted above, the Site Allocations DPD together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), results in combined potential delivery outside of the Intensification Area of 3,669 homes over the plan period 2009-2026. The housing capacity of the Harrow & Wealdstone Intensification Area is 3,681 homes (comprising sites allocated within the Area Action Plan, completions and pipeline supply as defined above). Therefore the combined housing output of the Site Allocations DPD and Area Action Plan is 7,350 homes over the plan period 2009-2026.

5.2.14 Harrow's Core Strategy provides for the delivery of 6,050 homes over the plan period. However this delivery figure, and the disaggregated figures for the Harrow & Wealdstone Intensification Area (2,800 homes) and the rest of the Borough (3,250 homes), are minimum targets. The combination of the development allocations in the Site Allocations DPD and Area Action Plan, together with completions and pipeline supply, exceeds the Core Strategy minimum target for the plan period by 1,300 homes and therefore raises the possibility of higher than expected demand for outdoor recreation at the European sites. However with the mitigation provided by the Core Strategy and the availability of other local sites for outdoor recreation, described above and considered as part of the Habitats Regulations Assessment of the Core Strategy, the combined number of additional visits is considered unlikely to be substantial. The impact of such additional visits that do occur can be addressed by the established conservation management techniques at the sites.

5.2.15 The Habitats Regulations Assessment screening report (2009) for the draft replacement London Plan recognises, in respect of a number of European sites across London, that "...increased visitor accessibility and disturbance are considered to be the main issue for consideration, reflecting one of the key themes of the London Plan to accommodate growth but only on the basis that the policies support the improving quality of Londoners' lives..." (para 3.2.6). The report goes on to recommend that the draft replacement London Plan Policy 3.3 *Increasing housing supply* and certain opportunity/intensification areas be the subject of lower tier assessment⁷.

⁷ "It will be appropriate to consider relying on the Habitats Regulations Assessments of lower tier plans, in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

A) The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas

B) The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on

5.2.16 The draft replacement London Plan Habitats Regulations Assessment screening report (2009) also recommends lower tier assessment of the South Wimbledon/Colliers Wood Intensification Area in relation to Richmond Park and Wimbledon Common and this will inform the relevant LDF and any specific, local mitigation measures required. In terms of the overall housing growth of London and the south east, considered as part of the Habitats Regulations Assessment of Harrow's Core Strategy, the extent of additional visitor pressure will be diluted by the availability of existing and new alternative open spaces provided-for in the Site Allocations DPD, whilst on-site management will mitigate the impact of increased visitor numbers upon the habitat of the stag beetle.

5.2.17 The Site Allocations DPD gives effect to Harrow's spatial strategy for the rest of the Borough (beyond the Harrow & Wealdstone Intensification Area). That spatial strategy has already been scrutinised as part of the Habitats Regulations Assessment of the Harrow Core Strategy. Any increased recreational pressure upon Richmond Park and Wimbledon Common associated with the housing growth provided-for through the capacity of sites identified in the Site Allocations DPD, in combination with the other sources of housing supply identified in this Assessment, will be mitigated by the availability of alternative open spaces, enhancement projects and new provision. It is therefore concluded that the Site Allocations DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Richmond Park and Wimbledon Common Special Areas of Conservation.

Wimbledon Common – Northern Atlantic wet heathland and European dry heathland

5.2.18 Although not the primary reason for the designation of the site, the heathlands at Wimbledon Common are also of conservation interest and are susceptible to recreational pressure (trampling) and deterioration of air quality.

5.2.19 For the reasons identified above and with management plans to safeguard the heaths from trampling, it is not considered that the Site Allocations DPD either alone or in combination with other plan and

site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and

C) The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy" Revised Draft Guidance *The Habitats Regulations Assessment of Local Development Documents* David Tyldesley and Associates for Natural England, February 2009

projects would have an adverse impact upon site integrity in terms of recreational pressure.

5.2.20 Air pollution poses a risk to heathland habitats through nitrogen deposition and acidification; the major contributor to air pollution is vehicle emissions. Harrow's Air Quality Action Plan (2004) provides policies and proposals, grouped into the following sections, to control air quality in the Borough:

- reducing emissions from vehicles;
- reducing road traffic;
- encouraging walking and cycling as means of travel;
- encouraging development that does not impact upon air quality; and
- public information and education.

5.2.21 The Site Allocations DPD will give effect to the overall spatial strategy set out in the Core Strategy by providing-for the delivery of housing development throughout the rest of the Borough (beyond the Harrow & Wealdstone Intensification Area) on previously-developed sites predominantly in town centres and other areas well served by public transport. The Site Allocations DPD will therefore deliver a spatial distribution of development that encourages a modal shift in emphasis away from car use.

5.2.22 In the above circumstances, together with the distance from Wimbledon Common, it is not considered likely that the Site Allocations DPD, on its own, would significantly effect the Wimbledon Common heaths.

5.2.23 Proposals for the development of sites allocated in the Site Allocations DPD would be assessed against the relevant policies in the Development Management Policies DPD and London Plan which aim to deliver a modal shift in emphasis away from car use and in particular encourage more sustainable (non motorised) modes. Together with the policy provisions of other London boroughs (which must be in general conformity with the London Plan) these should therefore contribute to regional air pollution reduction. Planning policies covering the boroughs containing European sites will need to build-in specific mitigation measures to control vehicle emissions within the vicinity of the site, informed by the relevant local Habitats Regulations Assessment.

5.2.24 It is therefore concluded that the Site Allocations DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the non-primary conservation interest of the Wimbledon Common Special Area of Conservation.

Lea Valley and South West London Water Bodies – Gadwell, Shoveler and Bittern habitat

- 5.2.25 Both the Lea Valley and South West London Water Bodies European sites are identified as wintering habitats for the Gadwell, Shoveler and Bittern bird populations. Both sites are vulnerable to human recreational activity and associated disturbance to nesting birds, the extraction of water and deterioration of water quality. Therefore the principal management techniques are the control of water extraction, in order to safeguard water levels and quality, and control of recreational activity. The Site Allocations DPD would have no direct or indirect impact upon the continuation of these management techniques.
- 5.2.26 The potential for population growth in the Borough to lead to increased use of the Lea Valley and the South West London Water Bodies has already been considered as part of the Habitats Regulations Assessment of the Harrow Core Strategy. It concluded that the likelihood of an adverse impact upon site integrity arising from the Core Strategy upon these two European sites can be excluded.
- 5.2.27 The housing capacity of the Site Allocations DPD site allocations together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction) will deliver 3,669 homes throughout the rest of the Borough (beyond the Harrow & Wealdstone Intensification Area). The Area Action Plan, together with recent completions and pipeline supply, will deliver between 3,681 homes within the Harrow & Wealdstone Intensification Area. Therefore, as noted under the assessment for the Richmond Park and Wimbledon Common sites above, the combined housing output of the Site Allocations DPD and Area Action Plan is 7,350 homes over the plan period 2009-2026, some 1,300 homes in excess of the Core Strategy minimum housing target.
- 5.2.28 The South West London Water Bodies comprise a total area of 830ha and, in addition to their primary function of public water supply, are used recreationally for angling, sailing and bird watching. Lee Valley covers an area of 450ha and is used for a variety of formal and informal recreational activity including athletics, golf, horse riding, ice skating, fishing, cycling, bird watching and camping. Lee Valley is a regional park likely to attract visitors from a wider catchment area than its immediate locality. The possibility that high demand for outdoor recreation from housing development throughout the Borough (beyond the Intensification Area) could lead to additional visitor numbers to these sites cannot therefore be excluded. The South West London Water Bodies provide for more specific, water-focused recreational activity and as the sites are privately owned do not automatically provide general public access. Nevertheless, the possibility of additional visits arising from population growth in Harrow also merits further consideration.

5.2.29 As noted above for Richmond Park and Wimbledon Common, there are within Harrow opportunities for alternative 'access to nature' recreation at Stanmore Common (49ha), Stanmore Country Park (32ha including Forty Acre Pond), Bentley Priory Open Space (66ha including Summerhouse Lake and Boot Pond) and Harrow Weald Common (19ha) (all in the Green Belt). In the surrounding area, within 1-2km of the Borough boundary, there are further such recreational opportunities: Fryent Country Park (100ha) and the Welsh Harp (100ha including the Brent Reservoir) to the south east, Aldenham Country Park (134ha including a 65 acre lake) to the north east and Ruislip Woods & Common (305ha including Ruislip Lido) to the west. It may also be noted that the Site Allocations DPD makes provision for the delivery of an additional nature reserve (0.9ha), an extension to Bentley Priory Open Space (3.3ha), an extension to Stanmore Country Park (25ha), and for two new publicly accessible natural/semi-natural greenspace sites (6.9ha & 3.14ha). However none of these contain substantial, potential recreational water bodies.

5.2.30 Further a field, major regional park alternatives include Hyde Park (142ha), Regents Park (166ha) and Hampstead Heath (320ha).

5.2.31 As described above for Richmond Park and Wimbledon Common, Harrow's Core Strategy seeks new open space as part of major development proposals, and the implementation of Green Grid & Biodiversity Action Plan projects to enhance access to open space and nature. As noted above, the Site Allocations DPD makes provision for a total of 38 hectares additional 'natural' public open space and a further three major opportunities for community outdoor sport use (30 hectares) and two smaller opportunities for local parks. These components of the Site Allocations DPD will support the delivery of the open space requirements of the Core Strategy. However it is unlikely that significant new surface water areas for water-based recreational activity will be created.

5.2.32 Nevertheless, in view of the availability of local alternative sites for equivalent outdoor recreation and with the mitigation provided by the Core Strategy, the number of additional visits to the Lee Valley Regional Park and South West London Water Bodies is unlikely to be substantial. The impact of such additional visits that do occur on the wintering habitats of the Gadwall, Shoveler and Bittern bird species can, it is considered, be controlled by the implementation of suitable management plans and techniques for the surface water areas and supporting marginal habitats of both sites.

5.2.33 The reservoirs at Lea Valley and at the South West London Water Bodies are owned by Thames Water, which serves much of the capital excluding north-west London. Harrow and adjoining parts of north-west London are served by Veolia Water (formerly Three Valleys Water) which sources ground water from a number of locations within

its wider operating area, and from rivers (notably the River Thames)⁸. Therefore, the residential development associated with the Site Allocations DPD and other sources of housing growth should have no direct impact on water extraction levels and consequent water quality at the two European sites under consideration here. Nevertheless, it is worth noting that the sustainable design provisions pursuant to a reduction in per-person consumption of mains water for new development in the Borough are included in the Development Management Policies DPD.

5.2.34 On this evidence it is considered that the likelihood of an adverse impact upon site integrity arising from the Site Allocations DPD of these two European sites can be excluded.

5.2.35 It remains, therefore, to consider the 'in combination' effects of other plans and projects.

5.2.36 In terms of recreation pressure, the draft replacement London Plan Habitats Regulations Assessment screening report (2009) recommends lower tier assessment of the Upper & Lower Lea Valley, Haringey Heartlands and Wood Green Intensification Areas in relation to the Lea Valley and this will inform the relevant DPDs and any specific, local mitigation measures required. In terms of the overall housing growth of London and the south east, the extent of additional visitor pressure will be diluted by the availability of existing and new alternative open spaces provided for in DPDs, whilst continued on-site management will mitigate the impact of increased visitor numbers upon the winter habitat of the Gadwell, Shoveler and Bittern bird populations.

5.2.37 As noted for Richmond Park and Wimbledon Common above, the number of additional visits associated with the combined housing growth to be delivered through the Site Allocations DPD and Area Action Plan is unlikely to be substantial. The impact of such additional visits that do occur can be addressed by the established conservation management techniques at the sites.

5.2.38 In terms of water levels and quality, as the reservoirs concerned do not supply Harrow, and will not therefore be affected by the Site Allocations DPD, there is no need to consider any 'in combination' impacts of other plans and projects.

5.2.39 It is therefore concluded that the Site Allocations DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Lea Valley and South West London Water Bodies Special Protection Areas.

⁸ The Plan forecasts the demand/supply balance for water to 2030, assuming no increase in the quantity of water extracted from the environment in line with the Environment Agency's position on water extraction licenses.

Cross-Cutting Effects – Climate Change

- 5.2.40 A cross cutting issue affecting all sites is that of climate change. UK climate change projections, for London, forecast an increase in mean summer temperature of 2.7 degrees, an increase in mean winter rainfall of 15 per cent and a decrease in mean summer rainfall of 18 per cent over a 1961-1990 baseline⁹. In short, the capital is likely to experience hotter, drier summers and mild, wetter winters.
- 5.2.41 There are a range of potential direct consequences for these European sites: drier summers could see increased demand for water extraction at the South West London Water Bodies and Lea Valley, could dry the decaying timber habitat of the stag beetle, or lead to increased incidence of woodland and heathland fires. Wetter winters could lead to increased incidence of flooding at European sites. As temperatures and climate conditions change, the ability of species to find appropriate alternative habitats is likely to be prevented by urban barriers and fragmentation of natural spaces in London, whilst adaptation to new environmental conditions could be impeded by the pace of climate change.
- 5.2.42 It is now generally accepted that climate change is inevitable, but that there remains scope to manage the degree of change and to mitigate some of the environmental consequences. Chapter 5 of the London Plan (2011) contains policies to tackle climate change and its effects, including a target to reduce London's carbon dioxide emissions by 60% (below 1990 levels) by 2025, a requirement for new development to follow the energy hierarchy, and a requirement for DPDs to include policies on sustainable building design (in addition to London Plan policies on sustainable design that are directly applicable to proposals for major development).
- 5.2.43 The Site Allocations DPD will give effect to the overall spatial strategy set out in the Core Strategy by providing-for the delivery of housing and other development requirements throughout the rest of the Borough (beyond the Harrow & Wealdstone Intensification Area) on previously-developed sites predominantly in town centres and other areas well served by public transport. The Site Allocations DPD will therefore deliver a spatial distribution of development that reduces the need to travel and encourages a modal shift in emphasis away from car use.
- 5.2.44 The spatial strategy, given effect through the Site Allocations DPD, also affords protection to open space and the natural environment within the Borough. In terms of the potential consequences of climate change, the principal risks in Harrow are the urban heat island effect (as a result of warmer summers) and flooding (as a result of wetter

⁹ The London Plan Consultation draft replacement plan (October 2009)

winters). By identifying sufficient previously-developed sites to provide Harrow's development needs, the Site Allocations DPD contributes to the protection of the Borough's open space (a natural counter to urban heating). Flood risk has been taken into account in the allocation of development sites to direct development to sites, or the parts of sites, of lower probability as appropriate. Therefore, the DPD will help to avoid exacerbating London's heat island effect and reduce the risk of increased flooding downstream of watercourses that flow through the Borough.

Findings of AA task 1: assessment of likely significant effects

- 5.2.45 This Habitats Regulations Assessment has considered the potential reach of the Site Allocations DPD in relation to European sites and has identified four sites within 15km distance of the Borough boundary.
- 5.2.46 The Site Allocations DPD will, upon adoption, work in combination with the Area Action Plan for the Harrow & Wealdstone Intensification Area to ensure the delivery of the Borough's development needs and the spatial strategy set out in Harrow's Core Strategy. The Site Allocations DPD allocates sufficient previously-developed land to provide 1,597 homes which, together with recent completions and pipeline supply (sites with planning permission but not started and sites under construction), will contribute 3,669 homes to the Core Strategy's housing delivery target for the plan period 2009-2026.
- 5.2.47 The Site Allocations DPD has been assessed for possible impacts on the identified European sites. Taking into account the mitigation measures built into the Core Strategy (and into the higher level London Plan, which will influence other boroughs' plans and projects) and established conservation & management techniques at European sites, it is concluded that the Site Allocations DPD development allocations would not have an adverse impact on the integrity of any European site. This conclusion has been reached having regard to the conservation objectives of the sites concerned and their vulnerabilities which comprise visitor pressure, water consumption and water quality, and - as a cross-cutting issue - climate change.
- 5.2.48 The Site Allocations DPD includes provisions to re-present retail and employment designations on the Harrow adopted policies map. These represent mainly modifications to existing designated areas and, in the case of neighbourhood parades and primary shopping areas, give effect to new designations. However they do not materially affect the scale and locations of development already provided-for and assessed as part of the Harrow Core Strategy. Similarly, modifications to existing open space and Site of Importance for Nature Conservation boundaries do not materially reduce overall levels of provision, whilst other allocations identify potential to increase open space, recreation and access to nature opportunities within the Borough. It is not

considered that any other components of the Site Allocation DPD are material in terms of the overall assessment of the plan's impact upon the European sites.

5.2.49 It is therefore not necessary to progress beyond AA task 1 (screening) to full appropriate assessment of the plan.

5.3 AA task 2: appropriate assessment and effect on site integrity

5.3.1 Not required – see above.

5.4 AA task 3: mitigation measures and alternative solutions

5.4.1 Not required – see above.

6. Habitats Regulations Assessment of the Submission Development Management Policies DPD

6.1 Summary of Submission Development Management Policies DPD

6.1.1 The Development Management Policies DPD contains the detailed policies for the consideration of development applications¹⁰ throughout the Borough. The policies give effect, where necessary, to the spatial strategy and strategic policies of the Core Strategy. The relevant provisions of the National Planning Policy Framework (2012), which are a material consideration, and of the London Plan (2011), which forms part of the development plan for all London boroughs, will also be used to make decisions on relevant applications.

6.1.2 The Development Management Policies DPD will, upon adoption, supersede the saved policies of the Harrow Unitary Development Plan (2004). Where specific development management provisions are needed to give effect to the Core Strategy in respect of the Harrow & Wealdstone Intensification Area, these will be contained within the Area Action Plan.

6.1.3 The pre-submission Development Management Policies DPD contains 62 policies set out in the following thematic chapters:

Character and Residential Amenity

- Policy 1: Achieving a High Standard of Development
- Policy 2: Achieving Lifetime Neighbourhoods
- Policy 3: Protected Views and Vistas
- Policy 4: Shopfronts and Signs
- Policy 5: Advertisements
- Policy 6: Areas of Special Character

Conservation and Heritage

- Policy 7: Heritage Assets
- Policy 8: Enabling Development
- Policy 9: Conservation Areas
- Policy 10: Listed Buildings
- Policy 11: Locally Listed Buildings
- Policy 12: Scheduled Ancient Monuments
- Policy 13: Archaeology
- Policy 14: Nationally Registered Parks and Gardens
- Policy 15: Locally Listed Parks and Gardens

Environmental Sustainability

¹⁰ Applications for planning permission, listed building consent, conservation area consent, advertisement consent, and any other approval regimes as appropriate under the terms of the Planning Acts.

- Policy 16: Managing Flood Risk
- Policy 17: On Site Water Management and Surface Water Attenuation
- Policy 18: Protection and Enhancement of River Corridors and Watercourses
- Policy 19: Sustainable Design and Layout
- Policy 20: Decentralised Energy Systems
- Policy 21: Renewable Energy Technology
- Policy 22: Prevention and Remediation of Contaminated Land

Open Space and the Natural Environment

- Policy 23: Redevelopment of Previously-Developed Sites within Green Belt and Metropolitan Open Land
- Policy 24: Beneficial Use of the Green Belt and Metropolitan Open Land
- Policy 25: Protection of Open Space
- Policy 26: Provision of New Open Space
- Policy 27: Protection of Biodiversity and Access to Nature
- Policy 28: Enhancement of Biodiversity and Access to Nature
- Policy 29: Pinner Chalk Mines
- Policy 30: Trees and Landscaping
- Policy 31: Streetside Greenness and Forecourt Greenery

Housing

- Policy 32: Housing Mix
- Policy 33: Office Conversions
- Policy 34: Conversion of Houses
- Policy 35: Amenity Space
- Policy 36: Protection of Housing
- Policy 37: Children and Young People's Play Facilities
- Policy 38: Sheltered Housing, Care Homes and Extra Care Housing
- Policy 39: Large Houses in Multiple Occupation and Hostels

Employment and Economic Development

- Policy 40: Managing Land Supply: Industrial and Business Use Land and Floorspace
- Policy 41: Managing Land Supply: Town Centre Offices and Northolt Road
- Policy 42: Economic Activities and Development
- Policy 43: Working at Home
- Policy 44: Hotel and Tourism Development
- Policy 45: Loss of Public Houses

Town Centres and Neighbourhood Parades

- Policy 46: New Town Centre Development
- Policy 47: Primary Shopping Frontages
- Policy 48: Secondary and Designated Shopping Frontages
- Policy 49: Other Town Centre Frontages and Neighbourhood Parades
- Policy 50: Vacant Shops in Town Centres and Neighbourhood Parades
- Policy 51: Mixed-Use Development in Town Centres
- Policy 52: Evening Economy

Transport and Waste

- Policy 53: Parking Standards
- Policy 54: Transport Assessments and Travel Plans
- Policy 55: Servicing
- Policy 56: Waste Management

Community Infrastructure

- Policy 57: New Community, Sport and Education Facilities
- Policy 58: Retention of Existing community, Sport and Education Facilities
- Policy 59: Enhancing Outdoor Sport Facilities

Telecommunications

- Policy 60: Telecommunications

Implementation, Resources and Monitoring

- Policy 61: Planning Obligations
- Policy 62: Enforcement

6.1.4 An analysis of the principal impacts of the provisions of the Development Management Policies DPD upon the identified European sites is set out at **Appendix I**.

6.2 Habitats Regulations Assessment - AA task 1: assessment of likely significant effects

6.2.1 The Development Management Policies DPD is not directly connected with or necessary to the management of any European site. It is therefore necessary to consider, firstly, whether the Development Management Policies DPD is likely to have a significant effect, either alone or in combination with other plans and projects, upon any European site.

6.2.2 There are no European sites in Harrow nor are there any such sites in any immediately adjoining borough. However the following sites are within a 15km radius of Harrow's Borough boundary:

European Site	Status	Distance from Harrow boundary
Richmond Park	Special Area of Conservation (SAC)	12.5km
Wimbledon Common	Special Area of Conservation (SAC)	15km
Lee Valley	Special Protection Area (SPA)	15km
South West London Waterbodies	Special Protection Area (SPA)	15km

6.2.3 The features and environment of each of these European sites, together with their conservation objectives, are set out at Appendices A-D of this report. Natural England is in the process of setting out conservation objectives for all SACs and SPAs and are not currently available, except in draft form for the Lee Valley SPA which were included in the Habitats Regulations Assessment for the Lee Valley Park Development Framework published November 2009. In the absence of formulated conservation objectives for these sites, those identified in the Habitats Regulations Assessment screening report for the draft replacement London Plan (2009) have been used.

6.2.4 Having regard to the primary and non-primary qualifying features of the four sites identified, it is necessary to consider the potential effects of the Development Management Policies DPD upon the key environmental conditions of each site to maintain the habitat's integrity, and the significance of these effects. For the purposes of assessing the potential effects of the Development Management Policies DPD it is assumed that the scale of growth (particularly housing development) will meet and exceed the minimum targets set out in the Core Strategy, and that the spatial distribution of growth will broadly accord with that provided-for in the Site Allocations DPD and Area Action Plan (see separate assessments above).

Richmond Park and Wimbledon Common – Stag Beetle habitat

6.2.5 In relation to the Stag Beetle populations at Richmond Park and Wimbledon Common, the principal management technique for the protection of their habitat is the continued maintenance of woodland pastures, leaving existing decaying timber *in situ* and allowing new decaying timber habitats to form. The Development Management Policies DPD would have no direct or indirect impact upon the continuation of this management technique for the preservation and renewal of the Stag Beetle's habitat at these sites.

6.2.6 Both sites are recognised as being vulnerable to human recreational activity and the consequences for the Stag Beetle's habitat in terms of

damage and general wear & tear within the woodland areas. The potential for population growth in the Borough to lead to increased use of Richmond Park and/or Wimbledon Common for recreational activity was considered as part of the Core Strategy Habitats Regulations Assessment. It concluded that the likelihood of an adverse impact upon site integrity arising from the Core Strategy upon these two European sites can be excluded.

- 6.2.6 The policies of the ‘character and amenity’ chapter of the DPD seek to achieve a high standard of design and layout of new development in the Borough and to protect positive attributes of local character. They would not affect human recreational activity at these two European sites.
- 6.2.7 The policies of the ‘conservation and heritage’ chapter of the DPD seek to preserve and enhance the Borough’s designated and non-designated heritage assets. They would not affect human recreational activity at these two European sites.
- 6.2.8 The policies of the ‘environmental sustainability’ chapter of the DPD seek to supplement the comprehensive provisions of the climate change chapter of the London Plan by setting out additional local requirements and criteria for minor development. Policy 18 seeks deculverting of rivers on development sites and in so doing will promote local access to natural environments¹¹, helping to alleviate visitor pressure upon the European sites. Other policies in this chapter would not affect human recreational activity at these two European sites.
- 6.2.9 The policies of the ‘open space and natural environment’ chapter of the DPD seek to safeguard all forms of open space and the Borough’s natural assets. Policies 25 and 27 provide the framework for protecting open space and biodiversity, and ensuring no loss of access to nature. Policies 26 and 28 seek new open space and opportunities to enhance biodiversity and access to nature, while Policy 24 sets out criteria for beneficial use of the Green Belt and Metropolitan Open Land. These policies therefore enable the continued protection of existing accessible open space assets and the provision of new space, and so help to alleviate visitor pressure upon the European sites. Other policies in this chapter would not affect human recreational activity at these two European sites.
- 6.2.10 The policies of the ‘housing’ chapter of the DPD seek to ensure an appropriate housing mix and set out the requirements for new and converted residential development, including sheltered housing, HMOs and secure accommodation. Policies 33, 34, 36, and 38 will ensure that the Borough’s housing needs are met on previously development, thus contributing to the protection of existing open

¹¹ Where biodiversity enhancement forms a part of the restoration/decultivating works.

space, whilst Policy 35 requires amenity space to be provided with major residential development. These policies therefore enable the continued protection of existing accessible open space assets and the provision of new space, and so help to alleviate visitor pressure upon the European sites. Other policies in this chapter would not affect human recreational activity at these two European sites.

- 6.2.11 The policies of the 'employment and economic development' chapter of the DPD seek to manage the release of surplus industrial and business use land supply, and promote economic development and diversification. Policies 40 and 41 will enable surplus previously developed land to be transferred to meet the Borough's housing and other development needs, enabling the continued protection of existing accessible open space assets and so helping to alleviate visitor pressure upon the European sites. Other policies in this chapter would not affect human recreational activity at these two European sites.
- 6.2.12 The policies of the 'transport and waste' chapter provide criteria for the consideration of the parking, traffic and servicing implications of development proposals, and for on-site waste management. They would not affect human recreational activity at these two European sites.
- 6.2.13 The policies of the 'community infrastructure' chapter supports the provision of new, and provides criteria for the release of surplus, community, sport and education facilities, as well as the enhancement and community access of existing facilities. They would not affect human recreational activity at these two European sites.
- 6.2.14 The policy of the 'telecommunications' chapter provides criteria for the installation of telecommunications equipment. It would not affect human recreational activity at these two European sites.
- 6.2.15 The policies of the 'implementation, resources and monitoring chapter seek to ensure that Planning Obligations are used to deliver site specific and other non-CIL¹² infrastructure requirements, and undertakes to take proportionate enforcement action where there has been a breach of planning control. They would not affect human recreational activity at these two European sites.
- 6.2.16 As many of the policies are assessed as having no impact and a small number are identified as helping to potentially alleviate visitor pressure, it is concluded that the likelihood of an adverse impact upon site integrity arising from the Development Management Policies DPD upon these two European sites can be excluded.

¹² Community Infrastructure Levy.

6.2.17 Policies in the London Plan form part of the development plan for all London boroughs and will therefore be applied alongside Harrow's Development Management Policies DPD in the determination of planning applications. The Habitats Regulations Assessment screening report (2009) for the draft replacement London Plan recognises, in respect of a number of European sites across London, that "...increased visitor accessibility and disturbance are considered to be the main issue for consideration, reflecting one of the key themes of the London Plan to accommodate growth but only on the basis that the policies support the improving quality of Londoners' lives..." (para 3.2.6). London Plan policies seek to preserve and integrate green infrastructure across London, and require development to make provision for access to nature together with the sport and recreational needs of the growing population. As other boroughs' LDF documents are required to be in general conformity with the London Plan, the 'in combination' effect will be the mitigation of visitor pressure by the retention and provision of new recreation opportunities throughout London. On-site management will continue to mitigate the impact of any increased visitor numbers at the European sites upon the habitat of the stag beetle.

6.2.18 It is therefore concluded that the Development Management Policies DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Richmond Park and Wimbledon Common Special Areas of Conservation.

Wimbledon Common – Northern Atlantic wet heathland and European dry heathland

6.2.19 Although not the primary reason for the designation of the site, the heathlands at Wimbledon Common are also of conservation interest and are susceptible to recreational pressure (trampling) and deterioration of air quality.

6.2.20 For the reasons identified above and with management plans to safeguard the heaths from trampling, it is not considered that the Development Management Policies DPD either alone or in combination with other plan and projects would have an adverse impact upon site integrity in terms of recreational pressure.

6.2.21 Air pollution poses a risk to heathland habitats through nitrogen deposition and acidification; the major contributor to air pollution is vehicle emissions. Harrow's Air Quality Action Plan (2004) provides policies and proposals, grouped into the following sections, to control air quality in the Borough:

- reducing emissions from vehicles;
- reducing road traffic;
- encouraging walking and cycling as means of travel;

- encouraging development that does not impact upon air quality; and
- public information and education.

6.2.22 The Development Management Policies DPD includes policies which promote housing and economic development and diversification, pursuant to the Core Strategy objectives to achieve growth of at least 4,000 new jobs and 6,050 homes in the Borough over the plan period. In doing so they will provide residents with locally accessible employment, retail and leisure opportunities, and providing employees within the Borough opportunities to access housing locally. It also includes policies which seek to direct retail, leisure and related uses to town centres, promote mixed use development in town centres, to control parking provision, and which seek transport assessments and travel plans for certain types of development. Taken together, these policies will help to achieve development that encourages a modal shift in emphasis away from car use.

6.2.23 In the above circumstances, together with the distance from Wimbledon Common, it is not considered likely that the Development Management Policies DPD, on its own, would significantly effect the Wimbledon Common heaths.

6.2.24 In terms of ‘in combination’ effects, the policies of the Development Management Policies DPD are in general conformity with and supplement the policies of the London Plan which aim to deliver a modal shift in emphasis away from car use and in particular encourage more sustainable (non motorised) modes. Together with the policy provisions of other London boroughs (which must also be in general conformity with the London Plan) these should therefore contribute to regional air pollution reduction. Planning policies covering the boroughs containing European sites will need to build-in specific mitigation measures to control vehicle emissions within the vicinity of the site, informed by the relevant local Habitats Regulations Assessment.

6.2.25 It is therefore concluded that the Development Management Policies DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the non-primary conservation interest of the Wimbledon Common Special Area of Conservation.

Lea Valley and South West London Water Bodies – Gadwell, Shoveler and Bittern habitat

6.2.26 Both the Lea Valley and South West London Water Bodies European sites are identified as wintering habitats for the Gadwell, Shoveler and Bittern bird populations. Both sites are vulnerable to human recreational activity and associated disturbance to nesting birds, the extraction of water and deterioration of water quality. Therefore the

principal management techniques are the control of water extraction, in order to safeguard water levels and quality, and control of recreational activity. The Development Management Policies DPD would have no direct or indirect impact upon the continuation of these management techniques.

6.2.27 As noted under the assessment for the Richmond Park and Wimbledon Common sites above, the Development Management Policies DPD contains policies that would directly safeguard open space (Policies 25 and 27) and others that – by enabling development needs to be met on previously-developed land – would indirectly safeguard open space (Policies 33, 34, 36, 38, 40 and 41). Existing open spaces with local public access to alternative water bodies can be found within the Borough at Stanmore Country Park (Forty Acre Pond) & Bentley Priory Open Space (Summerhouse Lake and Boot Pond). Other policies in the DPD promote new open and amenity space provision (Policies 26, 28 and 35) but it is unlikely that these would lead to the delivery of substantial water bodies for recreational use. Another policy (Policy 18) seeks deculverting of rivers on development sites and in so doing will promote local access to natural water-based environments, but again is unlikely to lead to the creation of substantial water bodies for recreational use.

6.2.28 Policy 17 of the Development Management Policies DPD gives effect to a target for new development to achieve mains water consumption of 105 litres or less per day per day. However, the reservoirs at Lea Valley and at the South West London Water Bodies are owned by Thames Water, which serves much of the capital excluding north-west London. Harrow and adjoining parts of north-west London are served by Veolia Water (formerly Three Valleys Water) which sources ground water from a number of locations within its wider operating area, and from rivers (notably the River Thames)¹³. Therefore Policy 17 will have no significant impact other than helping to reduce the risk of mains water needing to be supplied from other water company areas in the event of any shortage in the Veolia Water supply region.

6.2.29 As the many of the policies are assessed as having no impact and a small number are identified as helping to potentially alleviate visitor pressure, it is concluded that the likelihood of an adverse impact upon site integrity arising from the Development Management Policies DPD upon these two European sites can be excluded.

6.2.30 It remains, therefore, to consider the ‘in combination’ effects of other plans and projects.

6.3.31 The policies of the Development Management Policies DPD are in general conformity with and supplement the policies of the London

¹³ The Plan forecasts the demand/supply balance for water to 2030, assuming no increase in the quantity of water extracted from the environment in line with the Environment Agency’s position on water extraction licenses.

Plan. The Habitats Regulations Assessment screening report (2009) for the draft replacement London Plan recommends lower tier assessment of the Upper & Lower Lea Valley, Haringey Heartlands and Wood Green Intensification Areas in relation to the Lea Valley and this will inform the relevant DPDs and any specific, local mitigation measures required. Together with the policy provisions of other London boroughs (which must also be in general conformity with the London Plan), the London Plan and Development Management Policies DPD policies will therefore operate 'in combination' to help mitigate visitor pressure by the retention and provision of new recreation opportunities throughout London. Continued on-site management will mitigate the impact of any increased visitor numbers upon the winter habitat of the Gadwell, Shoveler and Bittern bird populations.

6.2.32 In terms of water levels and quality, as the reservoirs concerned do not supply Harrow, and will not therefore be significantly affected by the Development Management Policies DPD, there is no need to consider any 'in combination' impacts of other plans and projects in relation to this vulnerability.

6.2.33 It is therefore concluded that the Development Management Policies DPD, on its own and in combination with other plans and projects, would not be likely to lead to an adverse impact upon the primary conservation interest of the Lea Valley and South West London Water Bodies Special Protection Areas.

Cross-Cutting Effects – Climate Change

6.2.34 A cross cutting issue affecting all sites is that of climate change. UK climate change projections, for London, forecast an increase in mean summer temperature of 2.7 degrees, an increase in mean winter rainfall of 15 per cent and a decrease in mean summer rainfall of 18 per cent over a 1961-1990 baseline¹⁴. In short, the capital is likely to experience hotter, drier summers and mild, wetter winters.

6.2.35 There are a range of potential direct consequences for these European sites: drier summers could see increased demand for water extraction at the South West London Water Bodies and Lea Valley, could dry the decaying timber habitat of the stag beetle, or lead to increased incidence of woodland and heathland fires. Wetter winters could lead to increased incidence of flooding at European sites. As temperatures and climate conditions change, the ability of species to find appropriate alternative habitats is likely to be prevented by urban barriers and fragmentation of natural spaces in London, whilst adaptation to new environmental conditions could be impeded by the pace of climate changes.

¹⁴ The London Plan Consultation draft replacement plan (October 2009)

6.2.36 It is now generally accepted that climate change is inevitable, but that there remains scope to manage the degree of change and to mitigate some of the environmental consequences. Chapter 5 of the London Plan (2011) contains policies to tackle climate change and its effects, including a target to reduce London's carbon dioxide emissions by 60% (below 1990 levels) by 2025, a requirement for new development to follow the energy hierarchy, and a requirement for DPDs to include policies on sustainable building design (in addition to London Plan policies on sustainable design that are directly applicable to proposals for major development).

6.2.37 The Development Management Policies DPD includes a number of policies which, directly or indirectly, seek to contribute to the London wide target for carbon dioxide reduction. Policies 19, 20 and 21 apply criteria and requirements for sustainable design and construction to reduce emissions that would otherwise be associated with new development in the Borough. Policies 44, 46 and 51 will help to reduce emissions associated with transport by directing development to locate in town centres and other locations that both reduce the need to travel and support more sustainable transport choices than the car. Similarly Policy 43 supports home working, reducing the need to commute to work. Policies 53 and 54 seek to control car parking, and require transport assessments and travel plans for certain types of development, pursuant to a modal shift in emphasis away from car use. And Policy 56 applies criteria to achieve a reduction in the amount of waste generated and separation of waste on site, as well as requiring a waste management plan with major development proposals.

Findings of AA task 1: assessment of likely significant effects

6.2.38 This Habitats Regulations Assessment has considered the potential reach of the Development Management Policies DPD in relation to European sites and has identified four sites within 15km distance of the Borough boundary.

6.2.39 The Development Management Policies DPD will, upon adoption, work in combination with the London Plan to guide decisions on development proposals in the Borough. Where specific development management provisions are needed in relation to the Harrow & Wealdstone Intensification Area, these are to be contained within the Area Action Plan.

6.2.40 The Development Management Policies DPD has been assessed for possible impacts upon the European sites that are identified as being within 15km of the Borough boundary. Taking into account the mitigation measures built into the Core Strategy (and into the higher level London Plan, which will influence other boroughs' plans and projects) and established conservation & management techniques at European sites, it is concluded that the Development Management

Policies DPD policies would not have an adverse impact on the integrity of any European site. This conclusion has been reached having regard to the conservation objectives of the sites concerned and their vulnerabilities which comprise visitor pressure, water consumption and water quality, and - as a cross-cutting issue - climate change.

6.2.41 It is therefore not necessary to progress beyond AA task 1 (screening) to full appropriate assessment of the plan.

6.3 AA task 2: appropriate assessment and effect on site integrity

6.3.1 Not required – see above.

6.4 AA task 3: mitigation measures and alternative solutions

6.4.1 Not required – see above.

Sources of Information

LB Brent Habitats Regulations Assessment of the Core Strategy DPD
Proposed Submission Version (2009)

Natura 2000 Standard Data Forms (for the sites referred to)

Joint Nature Conservation Committee website (<http://www.jncc.gov.uk>)

Habitats Regulations Assessment for the Lee Valley Park Development
Framework published November 2009 (UE Associates for Lee Valley
Regional Park Authority)

Habitats Regulations Assessment screening report for the Consultation Draft
Replacement London Plan (2009) ERM Limited for the Greater London
Authority

Appendix A: Richmond Park Special Area of Conservation

- A.1 Richmond Park is selected as a European site because it is one of only four known outstanding habitats in the UK for the stag beetle (*Lucanus cervus*), an 'annex II' species for the purposes of the Habitats Directive. The conservation objective for this European interest on the site is to maintain, in favourable condition, the habitats for the population of the stag beetle (*Lucanus cervus*)¹⁵.
- A.2 The Park comprises a mix of broadleaved deciduous woodland, mixed woodland, wetland and acid grassland. It is the areas of ancient woodland, with retained decaying timber, that provide an important habitat for the stag beetle population and other invertebrates. The woodland pastures are maintained through grazing, coppicing and leaving fallen trees to form new decaying timber habitats, and by not removing existing decaying timber habitats.
- A.3 Richmond Park is vulnerable to high levels of recreational pressure associated with its situation within a highly populated urban area. Recreational activities include walking, cycling, horse riding, fishing, golf, picnicking and wildlife watching; associated facilities relating to these activities include educational centres, car parking, play grounds, restaurants and toilets.
- A.4 Management requirements and techniques include continued maintenance of woodland pastures, continue to leave decaying timber *in situ* and to control recreational pressure on woodland areas.

¹⁵ Conservation objective cited in the Habitats Regulations Assessment Screening Report on the consultation draft replacement London Plan (2009). Maintenance implies restoration if the feature is not currently in favourable condition.

Appendix B: Wimbledon Common Special Area of Conservation

- B.1 As with Richmond Park, so too Wimbledon Common is selected as a European site because it is one of only four known outstanding habitats in the UK for the stag beetle (*Lucanus cervus*), an 'annex II' species for the purposes of the Habitats Directive. However, Wimbledon Common is also recognised as comprising two qualifying habitats for the purposes of 'annex I' of the Habitats Directive. These are the Northern Atlantic wet heaths and the European dry heaths. The conservation objectives for this European interest on the site is to maintain, in favourable condition, the European dry heath, the North Atlantic wet heath with *Erica tetralix*, and the habitats for the population of the stag beetle (*Lucanus cervus*)¹⁶.
- B.2 The Common comprises a mix of broadleaved deciduous woodland, dry grassland, improved grassland and heath & scrub. There is also a bog and a number of pond habitats formed by disused gravel pits.
- B.3 The areas of ancient woodland with retained decaying timber provide an important habitat for the stag beetle population and other invertebrates and, as at Richmond Park, the habitat is maintained through management of woodland pasture, the retention of decaying timber and allowing new decaying timber habitats to form. The Northern Atlantic wet heathland includes cross-leaved heath *Erica tetralix* and wet heaths occur on acidic, nutrient poor peat or soil with impeded drainage. European dry heaths occur on freely draining, acidic and nutrient poor soil. Periodic mowing maintains wet and dry acid grassland.
- B.4 Wimbledon Common is also vulnerable to high levels of recreational pressure associated with its highly populated urban setting. Recreational activities and facilities at the Common are akin to those at Richmond Park, described above.
- B.5 As at Richmond Park, management requirements and techniques include maintenance of woodland pastures and control of recreational pressure in woodland areas.

¹⁶ Conservation objectives cited in the Habitats Regulations Assessment Screening Report on the consultation draft replacement London Plan (2009). Maintenance implies restoration if the feature is not currently in favourable condition.

Appendix C: Lee Valley Special Protection Area

- C.1 The Lee Valley is selected as a European site because it provides wetland habitats which support wintering wildfowl including Gadwell and Shoveler which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern. The conservation objective for this European interest on the site is to maintain, in favourable condition, the habitats for the populations of migratory bird species of European importance, with particular reference to open water and surrounding marginal habitats, Gadwell and Shoveler¹⁷. Natural England's draft conservation objectives for Lee Valley are to maintain in a favourable condition the open water and surrounding marginal habitats.
- C.2 The Valley comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. The wetlands and reservoirs occupy about 450ha of the valley. The habitats are maintained through the management of recreational activity and control of water extraction.
- C.3 The area is the vulnerable to high levels of recreational pressure and associated disturbance to the habitats of nesting birds, particularly during the winter months. Other threats include eutrophication¹⁸ of water quality and over-extraction of water for public supply.
- C.4 Management requirements and techniques include lack of disturbance during winter months and to allow for nesting birds, managed recreational activity, ensuring that water levels and water quality are sufficient to maintain water bodies and surrounding marginal habitats.

¹⁷ Conservation objective cited in the Habitats Regulations Assessment Screening Report on the consultation draft replacement London Plan (2009). Maintenance implies restoration if the feature is not currently in favourable condition.

¹⁸ Eutrophication is a damaging increase in the concentration of chemical nutrients in an ecosystem.

Appendix D: South West London Waterbodies Special Protection Area

- D.1 The South-West London Water Bodies are selected as a European site because they provide open water habitats which support wintering wildfowl including Gadwell and Shoveler which occur in numbers of European importance. The conservation objective for this European interest on the site is to maintain, in favourable condition, the habitats for the populations of migratory bird species of European importance, with particular reference to open water and surrounding marginal habitats, Gadwell and Shoveler¹⁹.
- D.2 The Water Bodies comprise a series of embanked water supply reservoirs and former gravel pits that support a range of man-made and semi-natural open water habitats. The designated area provides a total of 830ha open water and marginal grasslands.
- D.3 The reservoirs are vulnerable to repair and maintenance activity, including water draw-down to facilitate this activity, and in the longer term potential decommissioning. The marginal grasslands are vulnerable to vegetation succession, but this can be managed. Use of the water bodies for recreational activity also poses a potential threat to the conservation interest of these sites.
- D.4 Management requirements and techniques include lack of disturbance during winter months, managed recreational activities and control of water levels and quality.

¹⁹ Conservation objective cited in the Habitats Regulations Assessment Screening Report on the consultation draft replacement London Plan (2009). Maintenance implies restoration if the feature is not currently in favourable condition.

Appendix E: Summary of Submission Harrow & Wealdstone Area Action Plan, Site Allocations DPD and Development Management Policies DPD Habitats Regulations Assessment

Site	Qualifying Features (species and habitats)	Primary Qualifying Feature?	Key environmental conditions to support site integrity	Possible impacts from each of the Harrow & Wealdstone Area Action Plan Preferred Option	Is there a risk of an adverse impact upon site integrity from each of the Area Action Plan Preferred Option?	Possible impacts in combination with other plans or projects	Is there an adverse impact upon site integrity in combination with other plans or projects?
Richmond Park	Stag Beetle	Y	Maintain decaying timber habitat	No direct impact on woodland management to maintain decaying timber habitats	N/A	No direct impact on woodland management to maintain decaying timber habitats	N/A
			Manage visitor wear and tear upon habitat	Potential increase in visitor numbers to Richmond Park and associated wear and tear upon woodland habitat	Unlikely	Potential for 'in combination' increase in visitor numbers to Richmond Park and associated wear and tear upon	Unlikely

						woodland habitat	
			Maintain favourable climatic conditions	Potential to increase Borough's carbon dioxide output and contribute to climate extremes	Unlikely	Potential for 'in combination' increase in London's carbon dioxide output and contribution to climate change extremes	Unlikely
Wimbledon Common	Stag Beetle	Y	Maintain decaying timber habitat	No direct impact on woodland management to maintain decaying timber habitats	N/A	No direct impact on woodland management to maintain decaying timber habitats	N/A
			Manage visitor disturbance to habitat	Potential increase in visitor numbers to Wimbledon Common and associated wear and tear upon woodland habitat	Unlikely	Potential for 'in combination' increase in visitor numbers to Wimbledon Common and associated wear and tear upon	Unlikely

						woodland habitat	
			Maintain favourable climatic conditions	Potential to increase Borough's carbon dioxide output and contribute to climate extremes	Unlikely	Potential for 'in combination' increase in London's carbon dioxide output and contribution to climate change extremes	Unlikely
	Wet and dry heath	N	Maintain/improve air quality	Potential to increase Borough's output of nitrogen dioxide and particulates	Unlikely	Potential for 'in combination' increase in London's output of nitrogen dioxide and particulates	Unlikely
			Maintain favourable climatic conditions	Potential to increase Borough's carbon dioxide output and therefore contribute to climate extremes	Unlikely	Potential for 'in combination' increase in London's carbon dioxide output and contribution to climate change	Unlikely

						extremes	
Lee Valley	Wintering birds – Bittern, Shoveler and Gadwell	Y	Maintain water levels and water quality	Potential to increase water extraction and therefore contribute to reduced water levels and eutrophication	No	Potential for ‘in combination’ increase in water extraction and therefore to contribute to reduced water levels and eutrphication	No
			Manage visitor disturbance to habitat	Potential increase in visitor numbers to Lee Valley regional park and associated disturbance to nesting birds	Unlikely	Potential for ‘in combination’ increase in visitor numbers to Lee Valley regional park and associated disturbance to nesting birds	Unlikely
			Maintain favourable climatic conditions	Potential to increase Borough’s carbon dioxide output and therefore contribute to climate extremes	Unlikely	Potential for ‘in combination’ increase in London’s carbon dioxide output and therefore	Unlikely

						contribute to climate extremes	
South-West London Waterbodies	Wintering birds – Bittern & Shoveler	Y	Maintain water level and water quality	Potential to increase water extraction and therefore contribute to reduced water levels and eutrophication	Unlikely	Potential for 'in combination' increase in water extraction and therefore contribute to reduced water levels and eutrophication	Unlikely
			Manage visitor disturbance to habitat	Potential increase recreational use of water bodies and associated disturbance to nesting birds	Unlikely	Potential for 'in combination' increase in recreational use of water bodies and associated disturbance to nesting birds	Unlikely
			Maintain favourable climatic conditions	Potential to increase Borough's carbon dioxide output and therefore contribute to climate extremes	Unlikely	Potential for 'in combination' increase in London's carbon dioxide output and contribution to	Unlikely

						climate change extremes	
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Appendix F: Submission Harrow & Wealdstone Area Action Plan Site Analysis

Site or Designation Reference	Summary of Principal Characteristics of Allocation or Designation Change	Impact on European sites
Site 1	Community D1/D2 uses within heritage/museum complex.	No impact.
Site 2	Mixed use redevelopment of previously developed land (PTAL1/2) and reconfigured open space.	Allocation will make existing inaccessible open space available for community use. Therefore it will increase local opportunities for recreation and in so doing it will help to alleviate visitor pressure on European sites.
Site 3	Redevelopment of previously developed (PTAL1/2) and open land to provide new secondary school and reconfigured open space.	Allocation will make existing inaccessible open space available for school and community use. Therefore it will increase local opportunities for recreation and in so doing it will help to alleviate visitor pressure on European sites.
Site 4	Mixed use redevelopment on previously developed land in moderately accessible location (PTAL 3/4).	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 5	Mixed use redevelopment of multiple sites on previously developed land in town centre location.	Allocations will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 6	Mixed use redevelopment of multiple sites on previously developed land in highly accessible location (PTAL 5).	Allocations will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 7	Mixed use redevelopment on previously developed land in moderately accessible location (PTAL 3/4). Additional public open space would be created.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites. Additional public open space will increase local opportunities for recreation and in so doing it will help to

		alleviate visitor pressure on European sites.
Site 8	New waste management facility and intensified depot functions.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 9	Mixed use redevelopment on previously developed land in moderately accessible location (PTAL 4).	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 10	Mixed use redevelopment of multiple sites on previously developed land in moderately accessible location (PTAL 4).	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 11	Retail-led mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 12	Hotel-led mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 13	Retail-led mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 14	Retail-led mixed use redevelopment of previously developed land in highly accessible location (PTAL 5).	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 15	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 16	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 17	Mixed use redevelopment of previously developed land	Allocation will contribute to management of climate

	in town centre location.	change emissions and so help to mitigate consequences which affect European sites.
Site 18	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 19	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 20	Outdoor performance space within existing public open space.	No impact.
Site 21	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Site 22	Mixed use redevelopment of previously developed land in town centre location. Additional public open space would be created.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites. Additional public open space will increase local opportunities for recreation and in so doing it will help to alleviate visitor pressure on European sites.
Site 23	Mixed use redevelopment of previously developed land in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.

Appendix G: Submission Harrow & Wealdstone Area Action Plan Policy Analysis

Policy	Summary of Principal Policy Elements	Impact on European sites
AAP 1: Development within Harrow town centre	Requires development within Harrow town centre to strengthen its character, legibility and Metropolitan centre role. Provides general criteria on design, permeability and permanent and temporary uses. Details specific requirements for sub areas within the town centre.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 2: Station Road	Requires development along Station Road to make a positive contribution to its environment and identity, and to maintain or increase pedestrian and cyclist permeability with surrounding areas and public transport facilities.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 3: Wealdstone	Requires development to strengthen the vibrancy and vitality of Wealdstone district centre, and to improve the environment and identity of the area. Criteria for the constituent sub areas include the need for greater east-west connectivity, to improve perceptions of safety and security, support Wealdstone's employment function, and improve pedestrian and cycle connections particularly in relation to Harrow Leisure Centre. In relation to open space, other criteria seeks a significant contribution to the delivery of Harrow's Green Grid and to the quantity, quality and accessibility of open space and playing pitches serving the sub area.	<p>Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.</p> <p>Policy will help to promote increased local access to public open space and so help to alleviate visitor pressure upon European sites.</p>
AAP 4: Achieving a High Standard of	Requires development to maximise opportunities to increase pedestrian permeability, to implement the	Policy will contribute to management of climate change emissions and so help to mitigate

Development throughout the Heart of Harrow	Green Grid and create safe streets and public open spaces. Other criteria require development to incorporate sustainable building and site design, take a long term view of energy and water efficiency, and make satisfactory on-site provision for the storage and disposal of waste.	consequences which affect European sites. Policy will help to promote increased local access to public open space and so help to alleviate visitor pressure upon European sites.
AAP 5: Density and Use of Development	Requires development of sites allocated in the Plan to achieve identified site specific and sub area objectives, and other sites to be in general conformity with sub area guidance and the London Plan residential density ranges.	Policy will help to ensure that development needs are met on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
AAP 6: Development Height	Requires development to be of an appropriate height and provides criteria for the consideration of tall building proposals.	No impact.
AAP 7: Creating a New Public Realm	Requires development throughout the Intensification Area to create high quality, accessible, safe and attractive public realm. The creation of new public realm is required to strengthen pedestrian and cycle linkages to surrounding areas.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 8: Enhancing the Setting of Harrow Hill	Requires development to enhance the setting of Harrow on the Hill.	No impact.
AAP 9: Flood Risk and Sustainable Drainage	Sets out the area of search and the priority to be afforded to the regeneration of Wealdstone when applying the sequential and exception tests to major development proposals within the Heart of Harrow. Provides criteria for the provision of sustainable drainage with new development, including the priority afforded to more efficient use of water and	No impact.

	techniques that contribute to biodiversity.	
AAP 10: Harrow & Wealdstone District Energy Network	Requires major developments to connect to (or make provision to connect to) decentralised energy networks, and to install on-site heating and cooling networks. Applies the London Plan hierarchy for system selection.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 11: Provision of Open Space	Requires development to make provision for play space, amenity greenspace, civic space and (on schemes of 500+ homes) local or pocket parks. Criteria are provided for the reconfiguration of open space. Major residential development to provide play space on site.	Policy will help to promote increased local access to public open space and so help to alleviate visitor pressure upon European sites.
AAP 12: Improving Access to Nature	Requires development to incorporate features that support biodiversity within the Heart of Harrow and seeks opportunities to improve access to nature for residents.	Policy will help to promote increased local access to natural/semi natural environments and so help to alleviate visitor pressure upon European sites.
AAP 13: Housing within the Heart of Harrow	Re-affirms the delivery of at least 2,800 homes within the Heart of Harrow by 2026 and provides criteria for the creation of mixed, sustainable communities.	Policy will help to ensure that development needs are met on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
AAP 14: The Consolidation of the Wealdstone Strategic Industrial Location	Provides criteria for the consolidation of the Wealdstone Strategic Industrial Location (SIL) and resists any further loss of designated land following consolidation.	Policy will help to ensure land for economic development within the Wealdstone SIL is retained and will enable the transfer of surplus land to other uses to enable development needs to be met on previously-developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.

AAP 15: Supporting the Business Sector in Wealdstone	Provides criteria for uses and development on land designated as business and industrial use land, including mixed-use development.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 16: Supporting the Service Sector in Harrow town centre	Supports major new office, leisure, hotel and community development within Harrow town centre and requires major mixed use redevelopment of redundant offices to provide viable new floorspace.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 17: Harrow Primary Shopping Area	Directs major comparison goods retail development to the primary shopping area of Harrow town centre and provides criteria for changes of use within designated primary frontage.	No impact.
AAP 18: Secondary Frontages, Neighbourhood Parades and Non Designated Retail Parades	Cross refers to the Development Management Policies DPD for ground floor uses within secondary frontages, neighbourhood parades and non-designated retail frontages. Provides criteria for the consideration of temporary uses within secondary frontages and neighbourhood parades.	No impact.
AAP 19: Parking and Access within the Heart of Harrow	Requires major developments to prioritise access by sustainable modes and encourages development in appropriate locations to be 'car free'. Elsewhere, development to provide the minimum level of car parking consistent with the London Plan. Also seeks electric car charging points, car club schemes and cycle parking facilities.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 20: Harrow & Wealdstone Green Travel Plan	Requires development proposals to contribute to the funding of a Green Travel Plan for the Heart of Harrow and to produce site specific plans to give effect to the area-wide Plan.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
AAP 21: Harrow	Safeguards the existing civic amenity site for waste	Policy will contribute to management of climate

Waste Management Site	management and refers to West London Waste Plan site allocation of the adjoining depot site for waste management use. Provides criteria for proposals to intensify waste management activity on the site.	change emissions and so help to mitigate consequences which affect European sites.
AAP 22: Supporting Site Assembly within the Heart of Harrow	Gives commitment that the Council will use compulsory purchase powers where necessary for land assembly within the Intensification Area.	Policy will help to ensure that development needs are met on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.

Appendix H: Submission Site Allocations DPD Site Analysis

Site or Designation Reference	Summary of Principal Characteristics of Allocation or Designation Change	Impact on European sites
R1	Retail-only development of previously developed land in town centre location.	Allocations will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
R2	Retail-led mixed redevelopment of previously developed land in town centre location.	
R3	Retail-only development of previously developed land in edge of centre location.	
R4	[transferred to 'other' chapter as a minor modification]	
R5	Retail-led mixed use redevelopment of previously developed land in town centre location.	
R6	Retail-led mixed use redevelopment of previously developed land in town centre location.	
R7	Retail-led mixed use redevelopment of previously developed land in town centre/edge of centre location.	
RF01-RF05	Changes to extents of some shopping frontage designations (various town centres).	No impact.
NP00-NP27	Identifies properties included in Core Strategy neighbourhood parades.	No impact.
EM1	Employment-led mixed use redevelopment of previously developed land in accessible location (PTAL 4).	Allocations will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
EM2	Employment-led mixed use redevelopment of previously developed land in town centre location.	
EM3	Employment-led mixed use redevelopment of previously developed land in accessible location (PTAL 3).	
EM4	Employment-led mixed use redevelopment of previously	

	developed land in highly accessible location (PTAL 6).	
EM5	Employment-led mixed use redevelopment of previously developed land in highly accessible location (PTAL 5).	
Employment and Industrial Use Areas	Changes to boundaries of employment and business use area designations (various estates/areas)	No impact.
H1	Residential redevelopment of previously developed land in existing residential location.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites.
H2	[deleted as a minor modification]	
H3	Residential redevelopment of previously developed land in existing residential/commercial location.	
H4	Residential redevelopment of previously developed land in existing residential/commercial location.	
H5	Residential redevelopment of previously developed land in existing residential location.	
H6	Residential redevelopment of previously developed land in existing residential/commercial location.	
H7	Residential redevelopment of previously developed land in existing residential location.	
H8	Residential-led mixed use redevelopment of previously developed land in town centre location.	
H9	Residential redevelopment of previously developed land in town centre location.	
H10	Residential-led mixed use redevelopment of previously developed land in town centre location.	

		which affect European sites.
H11	Residential redevelopment of previously developed land in existing residential/commercial location.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites.
H12	Residential-led mixed use redevelopment of previously developed land in town centre location.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites. Allocations will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
H13	Residential redevelopment of previously developed land in existing residential location.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites.
H14	Residential redevelopment of previously developed land in existing residential location.	
H15	Residential redevelopment of previously developed land and open space (allowing for reconfiguration of existing open space to enable public access) in existing residential location.	
H16	Residential redevelopment of previously developed land in existing residential location.	
H17	Residential redevelopment of previously developed land	

	in existing residential location.	
H18	Residential redevelopment of previously developed land and football ground (to deliver publicly accessible facilities on a nearby open space site) in existing residential/commercial location.	
H19	Residential redevelopment of previously developed land in existing residential/commercial location.	
H20	Residential redevelopment of previously developed land in existing residential location.	
H21	Residential redevelopment of previously developed land in existing residential location.	
H22	[deleted as a minor modification]	
H23	Residential redevelopment of previously developed land in existing residential/commercial location.	
H24	Residential redevelopment of previously developed land in existing residential/commercial location.	
GB1	Residential redevelopment of strategic previously-developed land within the Green Belt.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites.
GB2	Residential redevelopment of strategic previously-developed land within the Green Belt.	
GB3	Continued educational use of strategic previously-developed land within the Green Belt.	No impact
GB4	Residential redevelopment of strategic previously-developed land within the Green Belt.	Allocation will help to meet Harrow's portion of London's housing need on previously developed land. In so doing it will help to ensure Harrow's housing requirements do not generate pressure in other London boroughs (where

		European sites are located) or lead to the loss of publicly accessible open space within the Borough. In so doing it will help to alleviate visitor pressure on European sites.
MOS1	Community outdoor sports use of inaccessible open space site.	No impact.
MOS2	[deleted as a minor modification]	
MOS3	Community access to inaccessible natural/semi-natural greenspace site within the Green Belt.	Allocation will achieve increased local public access to natural/semi-natural greenspace and so help to alleviate visitor pressure upon European sites.
MOS4	Community access to inaccessible natural/semi-natural greenspace site within the Green Belt.	
MOS5	Community access to inaccessible natural/semi-natural greenspace site within the Green Belt.	
MOS6	Continues development of open space site for community outdoor sports use.	No impact.
MOS7	Community outdoor sports use of inaccessible open space site.	No impact.
OS01-OS71	Changes to extents of some open space designations and some newly identified spaces designated (various locations).	No impact.
BD1-BD39	Changes to extents/categories of some Sites of Importance for Nature Conservation and some newly identified Sites of Importance for Nature Conservation (various locations).	No impact.
G01	Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields (to contribute to community access to facilities).	No impact.
G02	Medical/community redevelopment of previously-developed site in town centre location.	Allocation will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.

G03	Residential development on part of open space site to achieve community access to retained portion of open space.	Allocation will achieve increased local public access to pocket parks and so help to alleviate visitor pressure upon European sites.
G04	Arts and leisure redevelopment of previously-developed site in existing residential/commercial location.	No impact.
G05	Continued use of Gypsy and Traveller site in the Green Belt for that purpose.	No Impact.
G06	Residential development on part of farm complex/open space site to achieve community access to retained portion of open space and listed building enhancement.	Allocation will achieve increased local public access to pocket parks and so help to alleviate visitor pressure upon European sites.
G07	Community use led redevelopment with enabling retail and/or residential development.	No impact.

Appendix I: Submission Development Management Policies DPD Policy Analysis

Policy	Summary of Principal Policy Elements	Impact on European sites
Policy 1: Achieving a High Standard of Development	Provides criteria for development proposals on design, layout, privacy and amenity considerations.	No impact.
Policy 2: Achieving Lifetime Neighbourhoods	Requires development and improvements to the public realm, transport and other infrastructure to contribute to the creation of lifetime neighbourhoods.	No impact.
Policy 3: Protected Views and Vistas	Protects identified, locally significant views and vistas from intrusive development.	No impact.
Policy 4: Shopfronts and Signs	Provides criteria for shopfront and associated advertisement proposals.	No impact.
Policy 5: Advertisements	Provides criteria for other types of advertisement proposals.	No impact.
Policy 6: Areas of Special Character	Provides criteria for the protection of areas of special character.	No impact.
Policy 7: Heritage Assets	Provides criteria and other provisions for the protection and enhancement of all types of heritage asset.	No impact.
Policy 8: Enabling Development	Provides criteria for the consideration of proposals which secure the future of a heritage asset.	No impact.
Policy 9: Conservation Areas	Provides criteria for the control of development proposals within conservation areas.	No impact.
Policy 10: Listed Buildings	Provides criteria for statutory listed building change of use and development proposals.	No impact.
Policy 11: Locally Listed Buildings	Provides criteria for statutory listed building change of use and development proposals.	No impact.
Policy 12: Ancient	Safeguards scheduled ancient monuments.	No impact.

Monuments		
Policy 13: Archaeology	Provides criteria for proposals affecting archaeological priority areas.	No impact.
Policy 14: Nationally Registered Historic Parks and Gardens	Provides criteria for proposals affecting nationally recognised historic parks and gardens.	No impact.
Policy 15: Locally Listed Parks and Gardens	Provides criteria for proposals affecting locally recognised historic parks and gardens.	No impact.
Policy 16: Managing Flood Risk	Requires new development to be resistant and resilient to flooding, and to contribute to flood risk management and reduction.	No impact.
Policy 17: On Site Water Management and Surface water Attenuation	Requires new development to make efficient use of mains water and to control surface water run-off.	No significant impact ²⁰ .
Policy 18: Protection and Enhancement of River Corridors and Watercourses	Requires an undeveloped buffer zone to watercourses and main rivers, and deculverting/environmental enhancements to watercourses within development sites.	Policy will help to promote local access to nature (where biodiversity enhancement forms part of restoration/decultivating) and so alleviate visitor pressure upon European sites.
Policy 19: Sustainable Design and Layout	Sets out sustainable design requirements for minor development proposals ²¹ .	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 20: Decentralised	Supports decentralised energy proposals and requires minor development to connect to such	Policy will contribute to management of climate change emissions and so help to mitigate

²⁰ Although this policy will help to reduce demand for potable water, Harrow's supply comes from outside the water company area of the European waterbody sites identified in this Assessment.

²¹ Relevant requirements for major development proposals are set out in the London Plan.

Energy Systems	systems where feasible ²² .	consequences which affect European sites.
Policy 21: Renewable Energy Technology	Seeks incorporation of renewal energy technology in minor development proposals ²³ .	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 22: Prevention and Mediation of Contaminated Land	Requires a preliminary risk assessment with relevant applications and provides criteria for consideration of proposals where potential for land contamination is identified.	No impact
Policy 23: Redevelopment of previously sites within Green Belt and Metropolitan Open Land	Provides criteria for the redevelopment of previously-developed sites within the Green Belt and Metropolitan Open Land.	No impact
Policy 24: Beneficial use of the Green Belt and Metropolitan Open Land	Sets out criteria for the beneficial use of the Green Belt and Metropolitan Open Land including public access and biodiversity.	Policy will help to promote increased local access to natural/semi-natural open space and so help to alleviate visitor pressure upon European sites.
Policy 25: Protection of Open Space	Resists development on designated open space (other than ancillary development for the proper use of the open space).	Policy will help to maintain access to existing local open space and so help to avoid adding to visitor pressure upon European sites.
Policy 26: Provision of New Open Space	Requires major residential development proposals to make provision for new open space and for these to contribute to Harrow's Green Grid.	Policy will help to promote increased local access to public open space and so help to alleviate visitor pressure upon European sites.
Policy 27: Protection	Resists proposals that would harm biodiversity or	Policy will help to maintain access to existing local

²² Relevant requirements for major development proposals are set out in the London Plan.

²³ Relevant requirements for major development proposals are set out in the London Plan.

of Biodiversity and Access to Nature	increase local access deficiencies. Requires proposals to retain significant features on site and to loss where this is unavoidable.	biodiversity and so help to avoid adding to visitor pressure upon European sites.
Policy 28: Enhancement of Biodiversity and Access to Nature	Seeks opportunities to enhance locally important habitats and species, including restoration and recreation. Gives a high priority to public access in areas of access deficiency.	Policy will help to promote increased local access to natural/semi natural environments and so help to alleviate visitor pressure upon European sites.
Policy 29: Pinner Chalk Mines	Supports proposals for the enhancement of the environment and appreciation of Pinner chalk mines.	No impact.
Policy 30: Trees and Landscaping	Seeks the retention of trees and controls works to protected trees. Requires the provision of hard and soft landscaping with new development.	No impact.
Policy 31: Streetside Greenness and Forecourt Greenery	Resists substantial hardsurfacing of forecourts and front gardens.	No impact.
Policy 32: Housing Mix	Provides criteria for considering the appropriate mix of housing on development sites.	No impact.
Policy 33: Office Conversions	Provides criteria for the conversion of redundant office space to residential.	Policy will help to ensure a supply of windfall housing development over and above allocated sites on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
Policy 34: Conversion of Houses and other residential premises	Provides criteria for the conversion of houses and other residential premises to multiple units.	Policy will help to ensure a supply of windfall housing development over and above allocated sites on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.

Policy 35: Amenity Space	Provides criteria for the provision of amenity space in residential development. Requires amenity space provided with major residential proposals to have regard to the Biodiversity Action Plan and Green Grid.	Policy will help to promote local access to nature (where semi-natural environments are created within amenity space on major schemes) and so alleviate visitor pressure upon European sites.
Policy 36: Protection of Housing	Resists net loss of housing (overall and affordable).	Policy will help to ensure no loss of housing capacity on previously-developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
Policy 37: Children and Young People's Play Facilities	Requires provision of children's and young people's play facilities with proposals involving a net increase in child yield.	No impact.
Policy 38: Sheltered Housing, Care Homes and Extra Care Housing	Supports proposals on previously-developed land for sheltered housing, care homes and extra-care housing.	Policy will help to ensure a supply of sheltered housing, care homes and extra care housing on previously developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
Policy 39: Large Houses in Multiple Occupation, Hostels and Secure Accommodation	Provides criteria for the consideration of proposals for large houses in multiple occupation, hostels and secure accommodation.	No impact.
Policy 40: Managing Land Supply: Industrial and Business Use Land and Floorspace	Provides criteria for the release of surplus industrial land and the retention of the most suitable land for economic uses.	Policy will help to ensure suitable land for economic development is retained and will enable the transfer of surplus land to other uses to enable development needs to be met on previously-developed land. Will therefore contribute to safeguarding publicly

		accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
Policy 41: Managing Land Supply: Town Centre Offices and Northolt Road	Provides criteria for the release of surplus office space and the provision of replacement office space within town centres and the Northolt Road business use area.	Policy will help to ensure suitable office space is retained and will enable the transfer of surplus office space to other uses to enable development needs to be met on previously-developed land. Will therefore contribute to safeguarding publicly accessible open space in Harrow from development and in so doing help to alleviate visitor pressure upon European sites.
Policy 42: Economic Activities and Development	Identifies appropriate uses for industrial/business use areas, supports comprehensive redevelopment of estates and provides criteria for the assessment of impacts from economic development.	No impact.
Policy 43: Working at Home	Supports home working within existing dwellings, requires the provision space for home working in new residential development, and supports the provision of live work units.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 44: Hotel and Tourism Development	Directs hotel development to town centre/edge of centre/accessible sites and requires travel planning with major proposals. Provides criteria for guest house and bed & breakfast proposals.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 45: Loss of Public Houses	Provides criteria for the redevelopment and change of use of purpose-built public houses.	No impact.
Policy 46: New Town Centre Development	Directs retail, leisure and cultural development to town centres. Provides criteria for the consideration of out of centre proposals.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 47: Primary Shopping Frontages	Provides criteria for the change of use of shops within the primary shopping frontages of town	No impact.

	centres.	
Policy 48: Secondary Shopping Frontages	Provides criteria for the change of use of shops within the secondary and designated shopping frontages of town centres.	No impact.
Policy 49: Other Town Centre Frontages and Neighbourhood Parades	Provides criteria for the change of use of shops within non-designated frontages of town centres and neighbourhood parades.	No impact.
Policy 50: Vacant Shops in Town Centres and Neighbourhood Parades	Provides criteria for the consideration of proposals and temporary uses in centres and parades with a vacancy rate exceeding 10% over two years.	No impact.
Policy 51: Mixed Use Development in Town Centres	Supports mixed use development in town centres.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 52: Evening Economy	Provides criteria for evening economy uses.	No impact.
Policy 53: Parking Standards	Development to have regard to London Plan parking standards and operational requirements. Provides criteria for car-free development in town centres and supports the provision of car clubs.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 54: Transport Assessments and Travel Plans	Requires transport assessments with major development proposals and requires mitigation of impacts identified in assessments to contribute to modal shift away from car use.	Policy will contribute to management of climate change emissions and so help to mitigate consequences which affect European sites.
Policy 55: Servicing	Servicing	No impact.
Policy 56: Waste	Requires development to make provision for the	Policy will contribute to management of climate

Management	reduction and separation of waste. Requires a waste management plan with major development proposals.	change emissions and so help to mitigate consequences which affect European sites.
Policy 57: New Community, Sport and Education Facilities	Supports refurbishment of existing and provision of new community, sport and education facilities. Requires new education and indoor sport facilities to make provision for community access.	No impact.
Policy 58: Retention of Existing Community, Sport and Education Facilities	Provides criteria for the release of surplus existing community, sport and education facilities. Supports re-provision through redevelopment of existing facilities.	No impact.
Policy 59: Enhancing Outdoor Sport Facilities	Provides criteria for the enhancement of outdoor sports facilities including floodlighting.	No impact.
Policy 60: Telecommunications	Provides criteria for telecommunications proposals.	No impact.
Policy 61: Planning Obligations	Sets out the requirements for Planning Obligations.	No impact.
Policy 62: Enforcement	Identifies the circumstances in which breaches of planning control will be enforced.	No impact.