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Non Technical Summary

Development Planning in Harrow

1.1 The Council is replacing the Harrow Unitary Development Plan (2004) with a suite of new planning documents known collectively as the Harrow Local Plan. Many of the new documents will shape the Borough by guiding future decisions about development; key amongst the documents is Harrow's Core Strategy and the other Development Plan Documents (DPDs). The Core Strategy is the Plans overarching strategy document which determines the extent and location of the Borough's growth in housing, employment, leisure and retail provision. The three DPDs appraised in this report - the Development Management Policies DPD, Site Allocations DPD and the Harrow & Wealdstone Area Action Plan all support the strategic objectives and policies contained within the Core Strategy, and help implement its spatial strategy to realise the overall vision for the Borough.

Sustainable Development

1.2 Sustainable development is the core principal underpinning the planning system^(a). Sustainable development is often described as 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'^(b). The Government's four aims for sustainable development are:

- Social progress which recognises the needs of everyone;
- Effective protection of the environment;
- The prudent use of natural resources; and
- The maintenance of high and stable levels of economic growth and employment.

1.3 Local Planning Authorities are required to exercise their plan making functions with the objective of contributing to sustainable development. Harrow is aiming to do this through its Core Strategy and related planning documents.

The Role of Sustainability Appraisal

1.4 Sustainability Appraisal is a process which sits alongside the development of the planning documents which will form Harrow's Local Development Framework. The process contributes to sustainable development by 'testing' strategies and policies against social, economic and environmental objectives. The appraisal process enables the spatial strategy and policies to be modified to avoid unwanted consequences or maximise desired outcomes; other opportunities for mitigating adverse effects and maximising beneficial ones may also be developed as a result of the sustainability appraisal. Although sustainability appraisal will help to inform decisions about the spatial strategy and strategic policies to be adopted, by highlighting the social, economic and environmental advantages and disadvantages of the reasonable alternatives, the final choice will always remain a political one.

Harrow's Sustainability Objectives

1.5 In 2006 Harrow published a Scoping Report to ensure that all documents within the Harrow Local Development Framework are consistently and systematically assessed against the same set of objectives which address sustainability issues relevant to Harrow. This scoping report was revisited in 2010 to ensure these objectives were still relevant. The 16 objectives are as follows:

a National Planning Policy Framework - Chapter 1

b Our Common Future', the Brundtland Report to the 1987 World Commission on Environment and Development

1. To make the most efficient use of land and buildings
2. To protect the quality, quantity and accessibility of open spaces in the Borough
3. To conserve and enhance biodiversity in the Borough
4. To ensure that the Borough's historic environment is maintained and enhanced including its historic landscape and streetscape, listed buildings, conservation areas, archaeological sites and priority areas and culturally important features
5. To ensure that air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)
6. To reduce pollution of land (soil) and ensure that contaminated land is remediated
7. To improve water quality, better manage water supply and reduce the risk and impact of flooding
8. To promote development that ensures the sustainable use of energy
9. To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting
10. To facilitate the development of a dynamic and diverse economic sector which attracts growth
11. To improve the education and skills of the Borough
12. To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents
13. To reduce social exclusion and facilitate the development of mixed and balanced communities
14. To improve the health and wellbeing of Harrow residents and reduce inequalities in health
15. To improve the competitiveness, viability, vitality and adaptability of town centres in Harrow
16. To reduce crime, fear of crime and anti social behaviour

1.6 The 2006 document 'Sustainability Appraisal - Scoping Report for the Harrow Local Development Framework' can be viewed in full via the Council's website: <http://www.harrow.gov.uk/ldf>

Sustainability Appraisal and the Preparation of Harrow's Development Plan Documents

1.7 Harrow's Core Strategy was adopted in February 2012. Preparation of the Development Management DPD, Site Allocations DPD and the Harrow & Wealdstone Area Action Plan is now nearly complete ^(c) and these development plan documents will form Harrow's Local Plan. This sustainability appraisal report has been produced to accompany the documents submission to the Planning Inspectorate for independent Examination in Public (EiP) taking into account proposed minor modifications, following pre-submission consultation, and assesses the following document content:

- the Council's development management policies (by theme) for the Borough (excluding the Harrow & Wealdstone Intensification Area);
- the Council's allocation of development site and new/revised site specific policy constraints (excluding the Harrow & Wealdstone Intensification Area); and
- the spatial development strategy for the Harrow & Wealdstone Intensification Area and associated policies and site allocations.

c There will also be a Joint West London Waste Plan DPD

1.8 This sustainability appraisal is therefore submitted alongside the DPD's as part of the examination in public process.

Overview of Findings

1.9 The development plan documents the subject of this report give effect to Harrow's Core Strategy, the development of which has been informed by its own sustainability appraisal at each stage. This sustainability appraisal therefore represents a 'lower tier' of assessment, focusing on the subject matter of each of the documents; it does not assess the spatial strategy and levels of growth which have already been established through the Core Strategy.

1.10 Baseline information about the sustainability characteristics (including the current environmental condition) of the Borough has been updated. The content of the development plan documents has been assessed against the 16 sustainability objectives for Harrow set out in the 2006 Scoping Report. The findings of the assessment are summarised below.

The Development Management Policies DPD

1.11 The Development Management Policies DPD contains 61 policies arranged around the following ten themes:

- Protecting Harrow's character and residential amenity;
- Conservation and heritage;
- The environment;
- Green Belt, open space and biodiversity;
- Housing;
- Employment and economic development;
- Town centres and retail development;
- Infrastructure;
- Community and education facilities; and
- Telecommunications.

1.12 The appraisal showed that all of the policies have direct and indirect positive effects in relation to the relevant sustainability objectives. This reflects the specific nature of development management policies which are thematic and designed to control development where particular outcomes are desirable, or to resist development where necessary, in order to achieve appropriate social, economic or environmental benefits. It also indicates that there is strong synergy between the themes of the Development Management Policies DPD and Harrow's sustainability objectives. Few negative effects have been identified, and these are mitigated against by other policies, and many policies are identified as generating no significant effects (again reflecting the specific, thematic nature of the policies and therefore not all relevant to all sustainability objectives).

The Site Allocations DPD

1.13 Overall, the Site Allocations DPD performs well against the sustainability objectives. This reflects the approach to selecting development sites for inclusion in the document: sites with significant planning constraints and those which would fly in the face of Harrow's spatial strategy and vision were excluded. The Site Allocations DPD also identifies additional open space and biodiversity allocations, and makes a number of revisions to retail and employment designations.

These components of the document relate to planning policies which seek to achieve environmental, economic and social outcomes and therefore demonstrate strong synergy with Harrow's sustainability objectives.

1.14 The assessment has identified a small number of sites with negative, uncertain or no significant effects in relation to specific sustainability objectives. These findings have informed the allocations included in the document by highlighting opportunities to mitigate adverse effects by (for example) modifying a site's boundary, revising a site's allocation/designation, or by excluding a site altogether. The assessment has also provided a basis to consider opportunities to maximise the sustainability benefits of sites included in the document or in conjunction with the Development Management Policies DPD.

Harrow and Wealdstone Area Action Plan

1.15 The Area Action Plan sets out the Council's spatial development strategy. The strategy demonstrates how the Intensification Area will be developed to meet (and exceed) the Area's established growth objectives. This includes a housing and employment output, and how this output will be distributed to the component parts of the Intensification Area. It also includes detailed development management policies for the area and site allocations for key sites. The assessment in this report therefore focuses upon the relative merits, in sustainability terms, of the strategy presented in the document and the merits of the development management policies and site allocations.

1.16 The strategy has a strong positive effect in terms of efficient land use, and this is to be expected as this outcome forms a part of the *raison d'etra* for the Intensification Area. The strategy sees development spread throughout the Intensification Area, which produces some strong positive results in relation to economic development, town centre viability, health and social integration.

Area Action Plan Policies

1.17 The AAP contains 22 policies arranged around the following themes:

- Protecting Harrow's character and residential amenity;
- Conservation and heritage;
- The environment and Open Space;
- Housing;
- Employment and economic development;
- Town centres and retail development;
- Transport and Infrastructure

1.18 The appraisal showed that all of the policies have direct and indirect positive effects in relation to the relevant sustainability objectives. This reflects the specific nature of development management policies which are thematic and designed to control development where particular outcomes are desirable, or to resist development where necessary, in order to achieve appropriate social, economic or environmental benefits. It also indicates that there is strong synergy between the themes of the AAP and Harrow's sustainability objectives. Many policies are identified as generating no significant effects (again reflecting the specific, thematic nature of the policies and therefore not all relevant to all sustainability objectives).

AAP Site Allocations

1.19 Overall, the Sites Allocated in the AAP performs well against the sustainability objectives. This reflects the approach to selecting development sites for inclusion in the document: sites with significant planning constraints and those which would fly in the face of Harrow's spatial strategy and vision were excluded. The AAP DPD also makes a number of revisions to retail and employment designations. These components of the document relate to planning policies which seek to achieve environmental, economic and social outcomes and therefore demonstrate strong synergy with Harrow's sustainability objectives.

1.20 The assessment has identified a small number of sites with negative, uncertain or no significant effects in relation to specific sustainability objectives. These findings informed the allocations by highlighting opportunities to mitigate adverse effects by (for example) modifying a site's boundary, revising a site's allocation/designation, or by excluding a site altogether. The assessment also provided a basis to consider opportunities to maximise the sustainability benefits of sites included in the document or in conjunction with the Development Management Policies DPD.

What Happens Next?

1.21 The documents the subject of this sustainability appraisal report were be available for public consultation from 27th July to 7th September 2012. During this period this sustainability appraisal report was be made available for comment alongside the documents. Following the close of consultation, the Council considered all of the representations received and in response has published a schedule of proposed minor modifications for the Planning Inspector's consideration as part of the EiP process. This sustainability appraisal is submitted to the Planning Inspectorate alongside the DPDs and the representations to ensure that the environmental, social and economic effects of the DPDs, with the proposed modifications, is appraised.

Introduction

2.1 The Harrow Unitary Development Plan (2004) is now eight years old and, in accordance with provisions of the Planning and Compulsory Purchase Act (2004) (as amended), the Council is undertaking the preparation of a number of new planning documents that will replace it. In the meantime development decisions in Harrow are made with reference to the National Planning Policy Framework (2012), the London Plan (2011), Harrow's Core Strategy (2012) and the extant policies^(d) of the Harrow Unitary Development Plan (2004).

2.2 Together with the London Plan, Harrow's Development Plan Documents (DPDs) will form the 'development plan' for the Borough. Planning legislation requires decisions on planning applications to be made in accordance with the development plan unless material considerations indicate otherwise. The Government has re-affirmed its commitment to a plan-led system in the National Planning Policy Framework (NPPF), although the policies of the Framework are also a material consideration for decision making purposes. The Borough's DPDs must be consistent with the NPPF and in general conformity with the London Plan.

2.3 Harrow's Core Strategy is a DPD and it sets out a vision for Harrow in 2026, a spatial strategy for the delivery of that vision, an overarching thematic policy and strategic policies for the Borough's constituent districts (referred to as 'sub areas'). The three DPDs the subject of this sustainability appraisal report will give effect to the Core Strategy spatial vision by allocating sites for development and other uses, and will amplify its overarching thematic policy by setting out detailed policies which support appropriate development and resist inappropriate development. They are the:

- Harrow & Wealdstone Area Action Plan (AAP): containing site allocations and policies for the Harrow & Wealdstone Intensification Area;
- Site Allocations DPD: containing site allocations for the Borough excluding the Intensification Area; and
- Development Management Policies DPD: containing policies for the Borough including where relevant the Intensification Area.

2.4 Sustainability appraisal is a process which sits alongside the preparation of development plan documents. The purpose of the appraisal is to assess the performance of the site allocations and policies contained within the documents against social, economic and environmental objectives; the appraisal process adds value to the preparation of planning documents by informing decisions and highlighting content that may require modification and/or mitigation.

2.5 In 2006 the Council published a Sustainability Appraisal Scoping Report. The report analysed the social, economic and environmental challenges facing the Borough out of which sixteen sustainability objectives were identified and were the subject of verification by an independent consultant. These objectives, which were the subject of review in 2010 to ensure they were still relevant, will be used as appropriate to test the sustainability of all of Harrow's development plan documents.

2.6 This sustainability appraisal sets out to test the development management policies and site allocations for the Borough, and the spatial development strategy, policies and site allocations for the Harrow & Wealdstone Intensification Area, against the sixteen objectives established in the Scoping Report (the detailed results of the appraisal can be found in sections 5-7). The assessment has been carried out by Council officers during Spring/Summer 2012, and has been revisited in September/October 2012 following the pre-submission consultation, and represents

d A number of UDP policies have been deleted upon direction of the Secretary of State in 2007 and upon adoption of Harrow's Core Strategy in 2012.

the judgement of the officers involved of the likely/possible effects of the three development plan documents in reference to the evidence about the social, economic and environmental conditions currently prevailing in the Borough.

2.7 This Report is structured as follows:

- Chapter 3 sets out the legislative context and the methodology used in undertaking the assessment;
- Chapter 4 reviews the evidence base to reveal the sustainability issues currently facing the Borough; and
- Chapters 5 - 7 contains the appraisal of each of the development plan documents.

Methodology

SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

Introduction

3.1 Section 39 of the Planning and Compulsory Purchase Act (2004) requires any person or body exercising any function in relation to local development documents to do so with the objective of contributing to sustainable development. Section 19(5) of the Act also requires the local planning authority to: (a) carry out an appraisal of the sustainability of the proposals in each [development plan] document; and (b) prepare a report of the findings of the appraisal. The intention is to ensure that the implications for sustainability of proposals in development plan documents is understood and helps to inform all those involved in the plan preparation and decision making process.

3.2 In undertaking sustainability appraisal, the social and economic effects of proposals as well as environmental effects must be considered. Regard is had to the roles of the planning system in achieving sustainable development, as set out at paragraph 7 of the National Planning Policy Framework:

- **an economic role:** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- **a social role:** supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support health, social and cultural wellbeing; and
- **an environmental role:** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.3 Consultation with expert organisations, local groups and the general public is an important and integral part of SA, not least because this will contribute to fullest possible understanding of likely impacts of strategic and detailed policy choices.

3.4 The requirement for strategic environmental assessment of plans and programmes is set out in the Directive 2001/42/EC of the European Parliament and of the Council (27th June 2001) and is brought into force in England by the Environmental Assessment of Plans and Programmes Regulations (2004).

3.5 The scope of strategic environmental assessment and the content of resulting environmental reports are set out in the Directive's 15 Articles.

3.6 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) confirm that sustainability appraisal may incorporate the requirements for strategic environmental assessment and environmental reporting under the

terms of Directive 2001/42/EC as applicable in England by the Environmental Assessment of Plans and Programmes Regulations (2004). However it is for those undertaking sustainability appraisal to satisfy themselves that the requirements of the Directive have been met.

3.7 In conclusion, sustainability appraisal must be a rigorous assessment of the environmental implications of plans (and alternatives) required by the Directive but must also extend to assess the social and economic considerations regarded by the UK Government as contributing to sustainable development.

Scope

Article 3(1) & (2): An environmental assessment shall be carried out for plans which are likely to have significant environmental effects which are prepared for, inter alia, town and country planning or land use.

General Obligations

Article 4(1): The environmental assessment shall be carried out during the preparation of the plan and before its adoption.

3.8 This sustainability appraisal relates to the 'pre-submission' consultation version of Harrow's three DPDs.

Environmental Reports

Article 5(1): An environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and geographical scope of the plan, are identified, described and evaluated. The information to be given for this purpose must comprise:

(a) an outline of the contents, main objectives of the plan and relationship with other plans and programmes;

3.9 An outline of each DPD's content, objectives and their role as part of Harrow's development plan are outlined in the appraisals section (chapters 5 - 7). A list of the other plans and programmes is provided at Appendix A of this document.

(b) the relevant aspects of the current state of the environment and the likely evolution thereof without the intervention of the plan;

3.10 The current state of Harrow in relation to environmental (and other) sustainability topics is described in detail at Chapter 4 of this document. An assessment of 'do nothing' was been carried out as part of the Core Strategy Sustainability Appraisal, as that is the Strategy to which these DPDs give effect, and also the implications of the Do Nothing scenario are outlined in sections 5 -7.

(c) the environmental characteristics of the areas likely to be significantly affected;

3.11 Between them, the DPDs will apply to the whole Borough. A portrait of the social, economic and environmental sustainability issues facing Borough is also set out at Chapter 4 of this document.

(d) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance;

3.12 As above, the social, economic and environmental sustainability issues facing Borough are also set out at Chapter 4 of this document.

(e) the environmental protection objectives established at international, community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation

3.13 A review of relevant international, national, regional, sub-regional and local plans, policies and programmes was carried out during the preparation of the 2006 Scoping Report and revisited in 2010. Chapter 4 of the Scoping Report includes a list of the key messages from the review whilst the requirements of these plans, policies and programmes were used to develop the sixteen sustainability objectives that form the basis for this and other appraisals.

(f) the likely significant effects¹ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

¹these effects should include the secondary, cumulative, synergised, short, medium and long term, permanent and temporary, positive and negative effects.

3.14 The likely effects upon the environment are appraised at Chapters 5 - 7 of this document. In addition a separate assessment has been carried out for the purposes of the European Directive 92/43/EEC (Conservation of Natural habitats and Wild Fauna and Flora); a copy of the resulting Habitats Regulations Assessment will be published alongside the DPDs.

(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;

3.15 Maximisation opportunities and mitigation possibilities are set out at Chapters 5 - 7 of this document.

(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information;

3.16 A description of the methodology used to conduct the appraisal of the policies is included at Chapter 5-7 of this document.

(i) a description of the measures envisaged concerning monitoring; and

3.17 A selection of indicators for monitoring the performance of the development plan documents against Harrow's sustainability objectives is included at Chapter 7 of the 2006 and revised 2010 Scoping Report and monitoring of the Core Strategy's objectives and strategy are included as at Appendix E of the Core Strategy.

(j) a non-technical summary of the information provided.

3.18 A non-technical summary is provided at Chapter 1 of this document.

Article 5(2): The environmental report shall include information that may be reasonably required taking into account current knowledge and methods of assessment, the content and level of detail in the plan, its stage in the decision making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of assessment.

3.19 Chapter 4 of this document provides a broad characterisation of the Borough and the appraisal of effects are set out in Chapters 5 - 7. A tabulated format has been used to ensure systematic consideration against all sustainability objectives and associated detailed assessment criteria; the identification and evaluation of effects represents the judgement of Council officers.

3.20 This appraisal does not set out to assess the impact of the higher level London Plan and NPPF policies upon Harrow. Therefore, for example, the impact of the London Plan target to provide a minimum 3,500 new homes in Harrow by 2021 versus not providing that level of housing is not assessed here; the London Plan has itself been the subject of sustainability appraisal and has been formally adopted. Similarly the development-growth set out in Harrow's Core Strategy has also been the subject of separate sustainability appraisal and is not, therefore, revisited in this report.

Article 5(4): Certain authorities, designated by Member States by reason of their environmental responsibilities, shall be consulted when deciding the scope and level of detail of the information which must be included in the environmental report.

3.21 The Environmental Assessment of Plans and Programmes Regulations (2004) makes the following organisations in England statutory consultation bodies for the purposes of the SEA Directive:

- English Heritage
- Natural England (formerly English Nature & the Countryside Commission)
- The Environment Agency

3.22 These bodies were consulted on the Scoping Report between 25th July and 29th August 2006. A summary of the responses received from these bodies and how they have been dealt with is included at Appendix 3 of the adopted Scoping Report. These bodies also responded to the numerous consultations undertaken on the Core Strategy and its sustainability appraisals between 2006 and 2011.

Consultation

Article 6(1): The draft plan and environmental report upon it shall be made available to certain authorities, designated by Member States by reason of their environmental responsibilities, and to the public.

3.23 In England the statutory consultation bodies are as set out above. The DPDs and a copy of this report are being made available to the consultation bodies, other organisations and the general public.

Article 6(2): The authorities and the public shall be given early and effective opportunity within appropriate time frames to express their opinion on the draft plan and the accompanying environmental report before the adoption of the plan.

3.24 This sustainability appraisal report has been made available for comment alongside the DPD consultation documents.

Article 6(4): Member states shall identify the public to be consulted including the public affected or likely to be affected by, or having an interest in, the decision making subject to the Directive, including non-governmental organisations.

3.25 The Environmental Assessment of Plans and Programmes Regulations (2004) requires authorities to consult persons who, in the opinion of the authority, are affected or likely to be affected by or have an interest in the decisions involved in the assessment and the plan to which it relates.

3.26 The DPDs affect the whole Borough, neighbouring boroughs and other organisations (e.g. health and education service providers). Consequently the consultation on the DPDs and this sustainability appraisal report are being carried out as widely as possible with the public and other organisations.

Article 6(5): The detailed arrangements for the information and consultation of the authorities and the public shall be determined by Member States.

3.27 The Environmental Assessment of Plans and Programmes Regulations (2004) require that a copy of the environmental report and the plan to which it relates be sent to each statutory consultation body and that authorities must take such steps as they consider appropriate to bring the documents to the attention of the public. The Regulations also require authorities to inform the public as to where the documents may be viewed or copied, the address and the time limit for expressing opinions on the documents.

3.28 This sustainability appraisal report is available to view via the Council's website (<http://www.harrow.gov.uk/ldf>) and, by association with the DPDs, has been publicised widely.

Decision Making

Article 8: The environmental report and any opinions expressed following consultations shall be taken into account during the preparation of the plan and before its adoption.

3.29 This sustainability appraisal report and comments received as a result of the consultation have been submitted to the Planning Inspectorate (on behalf of the Secretary of State) as part of the examination in public of the DPDs.

Information on the Decision

Article 9(1): Member states shall ensure that when a plan is adopted the authorities and the public consulted of the plan and environmental report are informed and the following items made available to those so informed:

- *the plan as adopted;*
- *a statement summarising how the environmental considerations have been integrated into the plan and how the environmental report (together with the opinions expressed following consultations) have been taken into account, and the reasons for choosing the plan as adopted in the light of other reasonable alternatives dealt with; and*
- *the measures decided concerning monitoring (see below)*

Article 9(2): The detailed arrangements concerning the above information shall be determined by Member States.

3.30 The Environmental Assessment of Plans and Programmes Regulations (2004) sets out the arrangements for publicising decisions and the information that must be made available to this end.

Monitoring

Article 10(1): Member States shall monitor the significant environmental effects of the implementation of plans in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.

3.31 The Environmental Assessment of Plans and Programmes Regulations (2004) delegates this responsibility to authorities. As noted in a preceding section of this Chapter, a selection of indicators for monitoring the performance of the development plan documents against Harrow's sustainability objectives is included at Chapter 7 of the 2006 and revised 2010 Scoping Reports. Monitoring Indicators are also included in the Core Strategy and the other DPDs to monitor the effectiveness and impact of their implementation.

SUSTAINABILITY APPRAISAL - KEY STAGES AND TASKS

Introduction

3.32 Figure 5 of the ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) shows the stages and tasks to be undertaken in the conduct of sustainability appraisal & reporting in relation to the key stages for the preparation of development plan documents. This figure is reproduced below:

Picture 3.1

Figure 5 – Incorporating SA within the DPD process
DPD Stage 1: Pre-production – Evidence Gathering
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA.
DPD Stage 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs.
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report.
<p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <ul style="list-style-type: none"> • D1: Public participation on the preferred options of the DPD and the SA Report. • D2(i): Appraising significant changes.
DPD Stage 3: Examination
SA stages and tasks
<ul style="list-style-type: none"> • D2(ii): Appraising significant changes resulting from representations.
DPD Stage 4: Adoption and monitoring
SA stages and tasks
<ul style="list-style-type: none"> • D3: Making decisions and providing information.
<p>Stage E: Monitoring the significant effects of implementing the DPD</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Task A1: Identifying other relevant policies, plans, programmes and sustainability objectives

3.33 A review of all relevant international, national, regional, sub regional, local and corporate policies, plans, programmes, strategies and initiatives was undertaken during the preparation of the Council’s sustainability appraisal Scoping Report. The results are tabulated and key messages from the review are drawn out at Chapter 4 of the Scoping Report (2006, 2010). An updated list of policies, plans and programmes is attached at Appendix A to this report.

3.34 An initial list of overarching sustainability objectives was developed following the above review, in light of the key messages drawn from it and consideration of the main sustainability issues facing the Borough (see below). Following external verification of the draft Scoping Report by independent consultants the list of objectives was refined with additional explanation of each objective and decision making criteria & indicators.

Task A2: Collecting baseline information

3.35 This task was carried out during the preparation of the Council's sustainability appraisal Scoping Report and the findings set out at Chapter 5 of the published Scoping Report (2006) and updated for the revised 2010 Scoping Report. It begins by describing the sub-regional context for the Borough and goes on to describe Harrow's population and social profile, its housing, economy, employment, education & skills levels, tourism, transport, community safety & crime, health, environmental & heritage characteristics, waste planning, energy use, climate change susceptibility and air quality.

3.36 The baseline information has been updated to ensure that this sustainability appraisal is conducted upon the most recently available Borough monitoring information. The revised baseline data, sources and indicators are described at Chapter 4 of this document.

Task A3: Identifying sustainability issues and problems

3.37 Again this task was carried out during the preparation of the Council's sustainability appraisal Scoping Report and the findings set out at Chapter 6 of the published Scoping Report (2006). The Scoping Report was adopted following internal and external consultation and verification. A total of 65 social, economic and environmental sustainability issues were identified.

3.38 A review of the sustainability issues faced by the Borough, in relation to each of the 16 sustainability objectives' topic areas, is incorporated into this document at Chapter 4.

Task A4: Developing the sustainability appraisal framework

3.39 The Council's Scoping Report (2006) forms the framework for the conduct of sustainability appraisal in Harrow; it was adopted by the Council following internal and external consultation on the 16 sustainability objectives listed at Chapter 7 of the Scoping Report, which were reviewed as part of the revised Scoping Report 2010, form the basis for testing and monitoring the sustainability of DPDs produced as part of the Harrow's development plan.

Task A5: Consulting on the scope of the sustainability appraisal

3.40 Consultation with key stakeholders and the (then) four statutory consultation bodies was incorporated into the preparation of the sustainability appraisal Scoping Report. Details of this consultation are explained at Chapters 8 & 9 and Appendix 3 of the Council's Scoping Report (2006); this may be viewed via the Council's website (<http://www.harrow.gov.uk/ldf>).

Stage B: Developing and refining options and assessing effects

Task B1: Testing the development plan document objectives against the sustainability appraisal framework

3.41 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) emphasises the importance of securing compatibility between plan objectives and sustainability principles. Therefore testing the Core Strategy strategic objectives which inform the policies in the three DPDs against the Council's sustainability objectives is one of the ways of achieving this and will help to eliminate conflict between them.

Task B2: Developing the development plan document options

3.42 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) gives detailed advice on the development of options to achieve sustainable planning objectives. DPDs must improve the situation that would otherwise exist if there was no plan for the Borough and improve the effects of the extant provisions of the Unitary Development Plan. The guidance recommends that broad, strategic options are considered and that the findings of sustainability appraisal and consultation will inform the selection, refinement and publication of preferred options. As each option is refined commentary on sustainability issues and problems must be prepared and may include recommendations for the improvement of the options. Some options may be dropped from further consideration in the light of (for example) sustainability appraisal, compliance with national planning policy etc. However the sustainability appraisal report must document this process.

3.43 'Pre submission' is the final stage of consultation on the three DPDs and was carried out from 27th July to 7th September 2012. The DPDs have been revised following initial consultation in 2011, and a further stage of consultation in respect of the AAP carried out in early 2012, to take account of consultation responses, the publication of the NPPF, the adoption of the replacement London Plan and the adoption of Harrow's Core Strategy. Further minor modifications are proposed following the pre-submission consultation and these are incorporated into this appraisal. It should also be noted that the Core Strategy and its associated sustainability appraisal, which appraised the strategic objectives for the Borough, were subject to four formal rounds of public consultation and other public involvement from 2006/06 to 2011/12.

Task B3: Predicting the effects of the development plan document

3.44 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) confirms the need to predict the potential sustainability effects of the plan and its options in relation to the baseline situation.

3.45 Predicting the effects of the DPDs will help to demonstrate deliverability and potential impediments which need to be addressed. The effects of the proposed DPD policies and site allocations have been considered and predicted by Council officers during Spring/Summer 2012 and revisited September/October 2012 (to take account of proposed minor modifications). The outcome of this process is the principal subject of this report.

Task B4: Evaluating the effects of the development plan document

3.46 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) states that, once the effects of the plan have been predicted, an evaluation of their significance needs to be made.

3.47 As above the effects of the DPD's policies have been evaluated by Council officers during Spring/Summer 2012 and revisited September/October 2012 (to take account of proposed minor modifications). The evaluation of the effects of the policies/the 'do nothing' scenario have been tabulated against the detailed criteria for each sustainability objective, as established in the Council's Scoping Report (2006 and 2010) as part of the process of predicting effects. Wherever possible identified effects have been described as 'direct' or 'indirect'.

Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects

3.48 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) states that the sustainability appraisal report must include measures to prevent, reduce or offset significant adverse effects of implementing the plan. The measures may include proactive avoidance of adverse effects.

3.49 As the DPDs have progressed through their formal stages of production consideration has been given to the mitigation of adverse effects and the maximisation of beneficial effects. Wherever possible these have been built in to the content of the DPDs.

Task B6: Proposing measures to monitor the significant effects of implementing the DPD

3.50 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) emphasises the importance of monitoring the effects of implementing the plan. In particular monitoring will help to identify problems that may arise during implementation, to contribute to more accurate prediction of effects in future and may add to or inform the accumulation of baseline information for future use.

3.51 Monitoring indicators were included in the Council's 2006 Scoping Report and updated in the 2010 Scoping Report. Monitoring Indicators are also included in the Core Strategy and the other DPDs to monitor the effectiveness and impact of their implementation.

Stage C: Preparing the sustainability appraisal report

Task C1: Preparing the sustainability appraisal report

3.52 This document is the final version of the sustainability appraisal report for the three DPDs being submitted to the Planning Inspectorate for EiP.

Stage D: Consulting on the DPD and SA report

Task D1: Public participation on the preferred options of the DPD and the SA report

3.53 As noted above, the DPDs have been revised following initial consultation in 2011, and a further stage of consultation in respect of the AAP carried out in early 2012, to take account of consultation responses, the publication of the NPPF, the adoption of the replacement London Plan and the adoption of Harrow's Core Strategy. Following the 'pre-submission' consultation stage a schedule of minor modifications has been produced and the subject of further public consultation to inform participation in the EiP process.

3.54 The DPDs give effect to the provisions of Harrow's Core Strategy. Prior to its adoption in February 2012, the Core Strategy went through several stages of consultation including the draft preferred options consultation which took place between 6th June and 25th July 2008 and the preferred option consultation which took place between December 2009 and January 2010. The sustainability appraisal was made available for comment alongside the draft preferred options and the preferred options consultations. Final, pre-submission consultation on the Core Strategy and its sustainability appraisal was undertaken in April and May 2011. The EiP of the Core Strategy took place during September/October 2011 and the DPD was adopted 16th February 2012.

Task D2(i): Appraising significant changes

3.55 Consideration of consultee responses was undertaken following the close of consultation on the three DPDs in 2011 and again, in respect of the AAP, in early 2012. Following the pre-submission consultation the Council has published proposed minor modifications to the DPD, for consideration by the Planning Inspector through the EiP process. This report appraises the three submission DPDs taking into account the proposed minor modifications.

Task D2(ii): Appraising significant changes resulting from representations

3.56 Following the Secretary of State's independent examination of the Council's three DPDs and this sustainability appraisal report, the Inspector will produce a report which may include recommended changes for the Council to consider prior to adoption. In the event of such changes, the Council will consider their significance and revisit the sustainability appraisal report at this stage.

Task D3: Making decisions and providing information

3.57 The Council must produce an adoption statement to explain how sustainability considerations have been integrated into the document, including details of any resulting changes, and comply in all other respects with the adoption/information on decision requirements of the SEA Directive. This will be carried out prior to the Council adopting the three DPDs.

Stage E: Monitoring the significant effects of implementing DPD

Task E1: Finalising aims and methods for monitoring

3.58 The ODPM guidance document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) gives further advice on monitoring arrangements and fulfilling the requirements of the SEA Directive in this regard. The adopted Core Strategy and the three DPDs incorporate monitoring arrangements which, by proxy, will enable the environmental, social and economic effects of the DPDs to be monitored.

Task E2: Responding to adverse effects

3.59 Similarly advice is given on the consideration of contingency arrangements in the event that monitoring reveals the presence of adverse effects. The monitoring arrangements built into the DPDs incorporate triggers and contingencies that will enable any adverse effects of implementation to be revealed and remedial action taken during the plan period.

Sustainability Issues

EVIDENCE BASE

Review of Plans, Policies and Programmes

4.1 An overarching review of all relevant programmes, plans and policies was carried out as part of the Council's 2006 Scoping Report and updated in the 2010 Scoping Report. The review informed the development of the 16 sustainability objectives used as the basis for conducting the assessment of the DPDs.

4.2 A copy of the revised, updated list of relevant programmes, plans and policies is attached at Appendix A. As explained in the Scoping Report, many of the programmes, plans and policies are cross-cutting in nature and may influence the assessment of the DPDs across any number of the social, economic and environmental objectives.

Keeping the Evidence Up to Date

4.3 For each of the sustainability objectives it has been possible to identify generic baseline information which can reasonably be applied to Harrow, for example average household water consumption in the UK, and more often very detailed information relating to the Borough as a whole, wards within the Borough and 'super output areas' within wards. Wherever possible the most up-to-date baseline data has been used, however it is recognised that some data is now several years old but is nonetheless the best information currently available.

4.4 The collection of baseline information is an ongoing process. Any new evidence that comes to light will inform a review of this sustainability appraisal and be incorporated into an updated version for public consultation prior to submission to the Planning Inspectorate (on behalf of the Secretary of State) for examination in public.

CHARACTERISATION OF HARROW - CONTEXT AND OVERVIEW

Geographical and Physical Context

4.5 Harrow is an outer London Borough situated approximately 10 miles to the north-west of central London. It covers an area of 55 square kilometres and is bounded by the London Boroughs of Brent and Ealing to the south, Barnet to the east and Hillingdon to the west. The Hertfordshire districts of Hertsmere and Three Rivers lie to north.

4.6 The Borough occupies the north-western part of the geological area known as the London basin; the basin is made up of solid rocks from approximately 425 million years ago. Harrow sits on sediments laid down approximately 65 and 37 million years ago and known as London clay. Drift geology in Harrow, carried and laid down by rivers and glaciers, comprises Stanmore gravel found across the northern half of the Borough and Black Park Gravel in a small isolated patch on the south-western boundary of the Borough. Silt and sand deposits may also be found in the Stanmore marshes and the floodplains of the River Pinn, Yeading Brook and Wealdstone Brook.

4.7 There are no sites within Harrow and immediately neighbouring Boroughs designated under the European Directive 92/43/EEC relating to the conservation of natural habitats and wild flora and fauna. The nearest such European sites are at Richmond Park and Wimbeldon Common to the south, and Lee Valley, to the east - within 15km of Harrow's Borough boundary. The Council has conducted a Habitats Regulations Assessment screening exercise of the potential impacts

of the development plan documents on these three European sites and has concluded that, due to the distance between them and the Borough, it is unlikely that there would be any significant adverse impact.

4.8 There are two sites of special scientific interest located to the north of the Borough.

Sub-Regional Context

4.9 Harrow is part of the West London sub-region. It is served by some of the busiest parts of the trunk road network - the M1, M4, M4, M25 and M40 - and significant number of mainline rail and radial underground and local rail services out of London. The West London Alliance is the group of local authorities comprising the West London Sub Region and amongst other joint projects is funding and co-ordinating the preparation of a joint waste development plan document for the sub region.

Regional Context

4.10 Harrow is one of 33 London boroughs which, together, make up the Greater London region. At a regional level Greater London is governed by the Greater London Authority (GLA) and the Mayor of London who has a strategic planning function. The London Plan (2011) is the Mayor's spatial development strategy for the region and this forms a part of the development plan for all London boroughs.

4.11 The London Plan estimates the population of Greater London to have reached 7.80 million by 2011 and projects increases to 8.06 million by 2016, 8.32 million by 2021, and 8.57 million by 2026. The Plan demonstrates a strong demographic bias in favour of younger people and projects growth in the number of people over 65. The number of households is estimated in the Plan to have been 3.32 million 2011 growing to 3.49 million in 2016, 3.66 million in 2021 and 3.83 million by 2026.

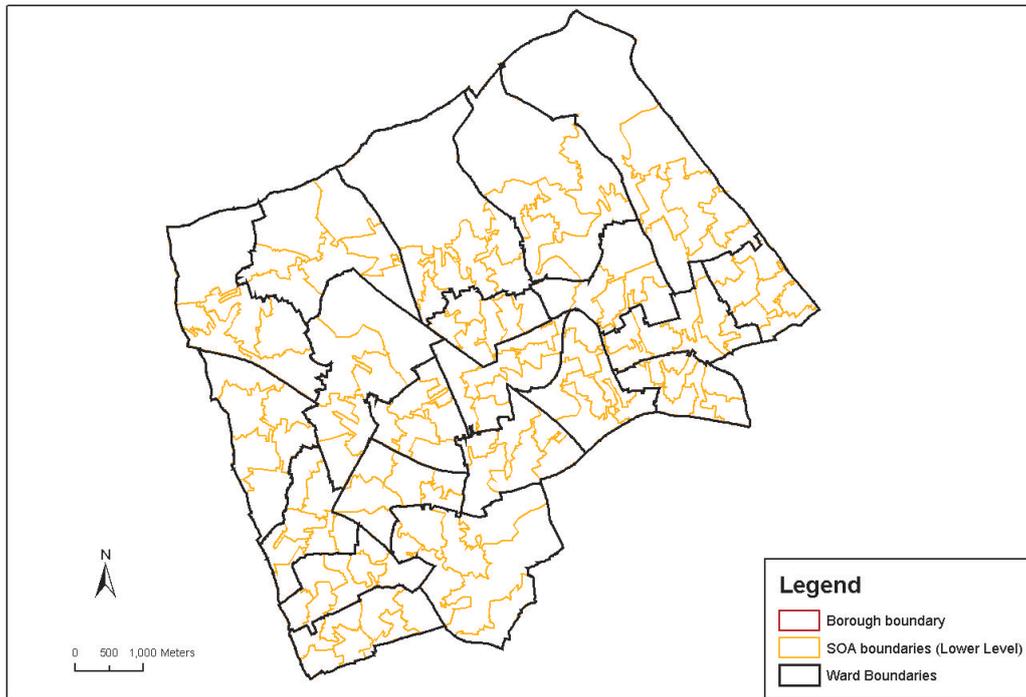
4.12 The London Plan predicts a return to moderate economic growth over the plan period, with strongest sector growth in business services and strongest employment growth in central and east London boroughs. It also highlights the problem of poverty and disadvantage in some areas (mainly to the east), and the challenge of climate change, infrastructure provision and quality of life in the region.

Harrow: An Introduction

Wards and Super-Output Areas

4.13 The Borough of Harrow is organised into 21 wards each of which is represented by three Councillors. Information about the Borough often refers to these wards, however some information is also presented in smaller geographical areas known as 'super output areas'. Such areas are beneficial because, when grouped on a map of the Borough, they provide a more detailed 'fine grain' picture than is possible at ward level; there are 137 super output areas in Harrow. A map of Harrow's 21 wards and 137 super output areas is shown below.

Map 4.1 Harrow Wards and Super Output Areas



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Population

4.14 At the 2011 Census there were 239,100 people living in the Borough. Of these 118,000 (49%) were male and 121,000 (51%) were female. The recorded population represents an increase of 32,300 people (15.6%) on the 2001 Census, when a population of 206,800 was recorded. The split of male and female residents was broadly the same in 2001. Regionally, the 2011 Census reveals that London's population has increased by 13.97% since 2001, from 7,172,100 to 8,173,900 people. Outer London's population was recorded as 4,942,100 people, an increase of 12.2% from the 2001 outer London population of 4,406,000.

4.15 The 2011 Census indicates that Harrow's population density has reached 47.37 persons per hectare (compared with 40.98 in 2001). For London the 2011 population density is 52.0 persons per hectare (compared to 45.6 in 2001) and for England as a whole is 4.1 persons per hectare (compared with 3.8 in 2001).

4.16 The following table provides a breakdown of the Borough's population by age group for the 2001 and 2011 Census, and shows the increase recorded over the ten year period.

Harrow's Population by Age Group, 2001 & 2011

Age	2001 Census	2011 Census	% Change (+)
0-4	12,000	15,900	32.5

Age	2001 Census	2011 Census	% Change (+)
5-9	12,900	14,400	11.6
10-14	13,900	14,600	5.0
15-19	13,500	15,100	11.9
20-24	13,000	16,100	23.8
25-29	15,700	19,300	22.9
30-34	16,400	19,600	19.5
35-39	17,000	17,100	0.6
40-44	15,000	16,600	10.7
45-49	13,700	16,300	19.0
50-54	13,500	15,200	12.6
55-59	10,900	13,100	20.2
60-64	9,400	12,000	27.7
65-69	8,300	9,400	13.3
70-74	7,000	8,000	14.3
75-79	6,100	6,700	9.8
80-84	4,100	4,900	19.5
85-89	3,000	3,000	0.0
90+	1,500	1,600	6.7
Totals	206,800	239,100	15.6

4.17 The following table provides a breakdown of the Borough's population by age group and gender for the 2011 Census.

Harrow's Population by Gender, 2011

Age	Male	Female	All
0-4	8,100	7,900	15,900
5-9	7,400	7,100	14,400
10-14	7,700	6,900	14,600
15-19	8,100	7,000	15,100
20-24	8,200	7,900	16,100

Age	Male	Female	All
25-29	9,600	9,800	19,300
30-34	10,100	9,600	19,600
35-39	8,500	8,600	17,100
40-44	8,000	8,600	16,600
45-49	7,900	8,500	16,300
50-54	7,400	7,800	15,200
55-59	6,500	6,600	13,100
60-64	5,800	6,200	12,000
65-69	4,400	5,000	9,400
70-74	3,800	4,200	8,000
75-79	3,100	3,600	6,700
80-84	2,100	2,900	4,900
85-89	1,100	1,800	3,000
90+	500	1,100	1,600
Totals	118,000	121,000	239,100

4.18 The 2011 Census records the number of households in Harrow at 84,300, an increase of 6.6% upon the 79,112 households recorded in 2001. The corresponding increases for Outer London, London as a whole and England are 5.9%, 8.3% and 7.9% respectively. In terms of household size, the average in Harrow has increased from 2.6 in 2001 to 2.8 in 2011.

4.19 Information regarding ethnicity has not yet^(e) been released for the 2011 Census. Information from the 2001 Census reveals that Harrow's population is one of the most ethnically diverse in England, comprising: 58% White, 2.8% Mixed, 29.6% Asian or Asian British, 6.1% Black or Black British and 2.6% Chinese or other.

Environmental Fabric

4.20 Land use in the Borough of Harrow is predominantly characterised by suburban residential development, pockets of industrial and employment use, historic and commercial centres and open spaces.

4.21 Compared to the inner London boroughs residential development in Harrow is of medium to low density. There are some limited areas of higher density Victorian, terraced housing particularly around South Harrow, Harrow-on-the-Hill and Wealdstone. In the northern, outer fringes of the Borough's built-up area there are post-war estates of (mostly) detached housing.

e As at July 2012.

However the predominant residential form, particularly in the central and southern sections of the Borough, dates from the 1920s and 30s, comprising semi-detached and short terraces of dwellings typical of the era.

4.22 An appraisal of the Borough's residential areas, including an assessment of environmental quality, has been carried out as a characterisation study and forms part of the evidence base underpinning the Core Strategy and other DPDs.

4.23 The industrial and employment use areas are predominantly clustered around central Harrow and Wealdstone, South Harrow and Honeypot Lane. They mostly comprise low density units in modern, purpose built estates located on buffer sites between residential areas and railway lines. Wealdstone is designated in the London Plan as a preferred industrial location (PIL) and Honeypot Lane is designated as an industrial business park (IBP).

4.24 The principal historic settlements in the Borough are Harrow-on-the-Hill, Wealdstone, Pinner and Stanmore. Development at Harrow-on-the-Hill is dominated by Harrow School and has little retail function. Wealdstone, Pinner and Stanmore have higher density cores of retail and commercial uses with residential development above. Other district and local centres – Rayners Lane, South Harrow, Hatch End, Harrow Weald, Belmont Circle, Burnt Oak and Queensbury Circle – are similarly local cores of higher density development usually comprising three storey frontages with retail at ground floor level and residential above; some limited commercial activity also takes place within/at the periphery of these centres. Pinner, Stanmore, Harrow Weald, South Harrow and Queensbury are served by major supermarkets. Harrow town centre is the major metropolitan centre serving the Borough and beyond; it comprises two indoor shopping centres, some purpose built office accommodation and upper level residential accommodation.

4.25 Large areas of open space are located around Harrow-on-the-Hill and to the northern half of the Borough. The residential areas are served by small local spaces and larger district parks/recreation grounds. However the space is not evenly distributed throughout the Borough.

4.26 The Borough comprises a total land area of 5,046 ha. Of this, some 1,070 ha is green space including 444 ha agricultural land, 881 ha recreational / amenity areas, 234 ha is commercial buildings, 34 ha is in industrial use, 284 ha is in educational use [including playing fields] and 90 ha is railway land. London clay underlies most of the Borough.

Land Use

4.27 S01 To make the most efficient use of land and buildings

Objective 1 of the SA Scoping Report seeks to make the most efficient use of land and buildings.

Land Quality

4.28 There are no major landfill sites in the Borough and there are no sites currently on the Council's Contaminated Land Register. However there are 563 sites of potential contamination concern. The former Kodak site in Wealdstone has been the subject of decontamination works in recent years to facilitate its redevelopment for residential, retail and other uses. Land at Wood Farm in Stanmore has a history of tipping but is to be managed and monitored as part of proposals for its use as an extension to Stanmore Country Park.

4.29 Other main areas remediated in the Borough in recent years have involved the redevelopment of former gas works and a number of petrol station sites to other (usually residential) uses. Consequently remediation is predominantly carried out by private developers as conditions of planning permission associated with these redevelopment schemes.

Density and Redevelopment

4.30 Although Harrow has a significant proportion of its land area as open space the majority of the Borough is built-up. Beyond the historic village settlements of Harrow-on-the-Hill, Pinner, Hatch End, Stanmore and Edgware many of the Borough's residential areas date from the 1920s and 30s and comprise traditional housing with gardens typical of the era.

4.31 The average density of completions for new major residential developments was 404 habitable rooms per hectare during 2010/11. In 2010/11 100% of new dwellings were completed at a density of more than 50 dwellings per hectare, compared with 70% in 2007/08. The average density of developments within areas of good public transport accessibility (PTALs) was 373 habitable rooms per hectare during 2010/11 (up from 336 HRPD in 2007/08).

4.32 The majority of new housing developments in the Borough are flats rather than houses. Nine planning permissions were granted for mixed-use development 2010/11 (down from ten during 2007/08).

4.33 As might be expected in an outer urban Borough, all new residential completions in Harrow took place on previously developed land during 2010/11.

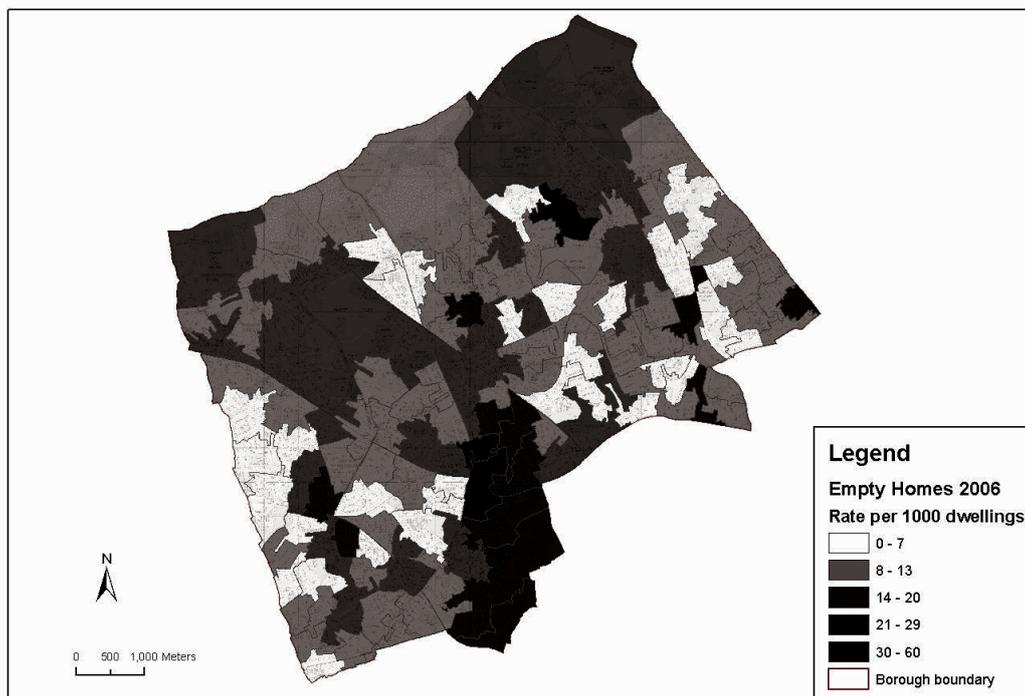
Under-used Property and Vacant Homes

4.34 There is no register of under-used property and derelict sites in the Borough as, historically, high land values in Harrow have resulted in sites being brought forward for development by private developers without the need for Council intervention. In connection with the London Plan housing target for Harrow, however, the Council has undertaken a housing trajectory of the potential redevelopment capacity of sites with and without planning permission. All of these sites would see redevelopment of land surplus to current owners' or previous users' requirements and it is anticipated that redevelopment for residential use would take place at higher than existing densities.

4.35 The Core Strategy (2012) identifies strategic, future housing development sites and contains a phased, 17 year housing trajectory covering the period 2009-2026. The trajectory is broken down by sub area.

4.36 In 2006 there were 1,093 empty homes in Harrow, equivalent to 13 per 1,000 homes across the Borough. The central area ward of Greenhill had the highest proportion of empty homes at 26 per 1,000. The distribution of empty homes across the Borough is shown on Map 4.2 below.

Map 4.2 Empty Homes



Sustainable Building and Design

4.37 Harrow has adopted a Sustainable Building Design SPD, which aims to guide development to be more sustainable by requiring certain building standards are applied to new developments, such as the BREEAM standard. The London Plan contains a suite of planning decisions policies to give effect to a target to reduce London's carbon emissions by 60% below 1990 levels by 2025, and to ensure that development (often focusing on major development) achieves improvements on the 2010 Building Regulations pursuant to zero carbon residential buildings by 2016 and zero carbon non-domestic buildings by 2019.

4.38 In 2006 two supplementary planning documents, 'Access for All' and 'Accessible Homes', were adopted; these provide detailed design guidance to achieve equality of access in new development and to secure lifetime and wheelchair-accessible housing. The Accessible Homes SPD was revised and re-adopted in 2010 to incorporate up-to-date standards and to supplement relevant saved policies in Harrow's UDP.

4.39 During 2010/11 the Council's pre-application advice services – the Planning Advice Team (PAT) and the Planning Advice Meetings (PAM) – considered 104 proposals. It is hoped that, in conjunction with front-loading strategic decisions through the Core Strategy and site allocations development plan document, this service will continue to provide a forum for detailed discussion on major development schemes. In addition the Council runs a Conservation Areas Advisory Committee which comments on applications affecting conservation areas. The local newspaper, the Harrow Observer, and the Harrow Heritage Trust jointly organise a local Architectural and Environmental Award Scheme.

Open Space

Objective 2 of the SA Scoping Report seeks to protect the quality, quantity and accessibility of open spaces in the Borough.

4.40 Harrow has 1,334 hectares of open space in public and private ownership, equivalent to 26% of the land area of the Borough.

Green Belt and Green Chains

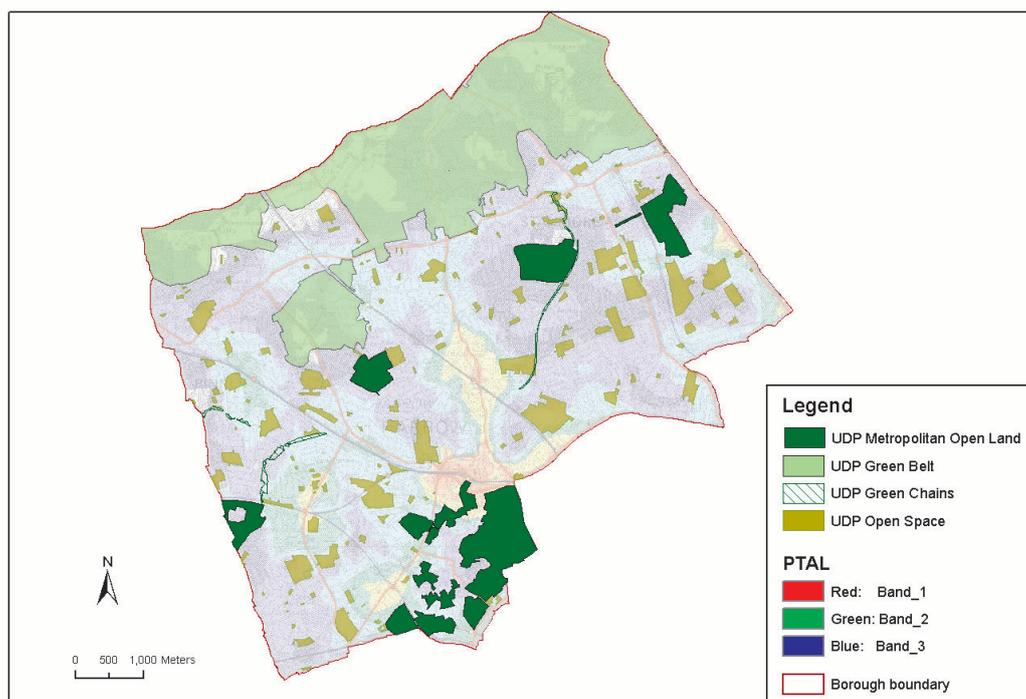
4.41 The Green Belt stretches across the north of the Borough although there is also a separate area of Green Belt at Pinner Park Farm, between Hatch End and Pinner. In total the Green Belt covers nearly 20% of the total area of the Borough and equivalent to 0.85ha per 1,000 population.

4.42 Not all land in the Green Belt is accessible to the public. The principal publicly accessible sites are: Stanmore Country Park, Stanmore Common, Bentley Priory, Grimdsyke Open Space, Harrow Weald Common, Harrow Weald Wood and Sylvia Avenue Open Space.

4.43 Harrow's PPG 17 Study 2010 found that overall the quality of Natural and Semi Natural Greenspaces sites is consistently 'good'/'very good' but that there are areas for improvement relating to provision of benches & toilets, poor signs, inadequate parking and poor access for disabled people.

4.44 In addition to the Green Belt and open spaces there are 18 Green Chains in the Borough providing linear open space for walking, cycling and horse riding. These are shown on the attached map below. The 2010 Study rated the quality of many of them as low, with poor maintenance.

Map 4.3 Green Belt, Open Space and Green Chains



Parks and Gardens

4.45 Harrow has a total of 28 parks and gardens providing 1.21ha per 1,000 population; these are categorised as country parks (1), major parks (3), district parks (2) and local parks (21). However the geographical distribution of the space is not proportionate to the spread of development and population across the Borough. There are significant areas, particularly in the centre and southern areas of the Borough, identified as lacking local park provision (where there is more than 400m distance between homes and a park entrance).

4.46 The PPG 17 Study (2010) found that park quality varies, but Canons Park, which has Green Flag status, achieves high scores on the audit. Residents' perceptions give above average scores generally, but indicate room for improvement in areas like cleanliness, planting and amenities; toilets, seating, and safety after dark attract negative perceptions.

Allotments and Cemeteries

4.47 In addition to the parks there are 37 active allotment sites providing 1,350 plots. The waiting list for plots (not usually a precise indicator of demand) suggests a substantial latent demand for more provision. There are no allotment sites at all in the north-eastern PPG 17 Study sub-area. A majority of people think the quantity of provision is about right, but a substantial minority want more; demand is highest in the southeast.

4.48 There are 14 burial grounds in Harrow, and these are mostly full other than for specific religious requirements; burials now are directed to the cemetery at Carpenders Park, managed by Brent Council. Cremations are normally undertaken at Ruislip, but Harrow cemeteries do offer facilities for interment of cremated remains. There are 7 cemeteries and burial grounds which are the responsibility of Harrow Council. Cemetery sites vary in quality; residents comment favourably on cleanliness, and on daytime safety, but are less positive about the care of plots and headstones, and are critical of a lack of seating.

Play & Teenage Facilities

4.49 Harrow has 42 equipped play areas, and a further four open access multi-use games areas suitable for informal games. These focus primarily on the needs of younger children; just six play spaces are provided specifically for teenage users.

4.50 The PPG 17 Study 2010 shows that there is no provision of youth facilities in the east area of the Borough. Quality scores are mixed, with some excellent sites counter-balanced by some that are poor. Resident perceptions are that spaces are well located and accessible, safe and well used; but there are doubts about seating, the age range supported at different sites, and cleanliness. Teenage spaces get very low ratings and are criticised heavily for lighting, attractiveness and maintenance, and safety.

Outdoor Sports

4.51 There are a total of 84 playing pitches in Harrow comprising 65 football pitches, 9 cricket pitches, 8 rugby pitches and 2 grass hockey pitches. A total of nearly 160 ha of space in Harrow is given over to sports pitches, which are distributed across the Borough, but with a greater level of provision in the northwest sub-area. In addition there are 14 multi-use games areas (MUGAs), five synthetic turf pitches (STPs), 11 bowling greens and 114 tennis courts on 24 sites. Only

15% of Harrow's football pitches rate as good or excellent, but cricket pitches score very well, and rugby also has good quality pitches. Tennis and bowls also generally have good quality facilities, and the MUGAs and STPs offer good quality as well.

4.52 There are 14 tennis clubs in Harrow providing 71 courts of which 20 are floodlit; of these most are provided in the west and central areas. Harrow Council owns a further 51 courts for casual use, more evenly distributed across the Borough, although it should be noted that some of these are on multi games use areas.

4.53 There are 10 bowling clubs in Harrow. The greens are broadly distributed across the Borough and were generally rated as good.

4.54 There are 2 synthetic athletics tracks in Harrow, the principal site for public access being the Roger Bannister Sports Centre round located in the Green Belt to the north of the Borough (the other facility is provided at Harrow School to the south of the Borough).

4.55 There are 5 golf courses in Harrow. Three of these are in private ownership - Grimsdyke Golf Course (18 holes), Harrow School Golf Club (9 holes), Brockley Hill Golf Park – and two are owned by the Council (but leased to golf clubs) – Pinner Hill Golf Club (18 holes) and Stanmore Golf Course (18 holes) – where community use agreements are in place.

4.56 A separate Sports Hall and Swimming Pool study has also been undertaken by Sport England for Harrow and is available as part of the evidence base.

Walking and Cycling

4.57 As well as formal recreational facilities Harrow's open spaces also provide opportunities for walking and cycling. There are public rights of way through otherwise inaccessible parts of the Green Belt (such as Pinner Park Farm) and Metropolitan Open Land (such as Harrow-on-the-Hill). As noted above Green Chains also provide routes through areas of the Borough for walkers and cyclists, and there are sections of formal strategic routes: part of the London Outer Orbital Path (LOOP) runs through the Green Belt and the Harrow section of the Capital Ring walk is routed around Harrow-on-the-Hill.

4.58 A formal cycle route, part of the transport charity Sustran's strategic network, is proposed to run through the west area of the Borough. A Green Grid for Harrow is also being developed, which will aid in connecting up Harrow's Open spaces, and making them more accessible.

Biodiversity

Objective 3 of the SA Scoping Report is to conserve and enhance the biodiversity of the Borough.

4.59 Biodiversity relates to natural habitats and wildlife. There are no sites of international biodiversity importance in Harrow; as noted above a Habitats Regulations Assessment screening exercise has been carried out in connection with the two nearest European sites at Lee Valley and Richmond Park. However there are a small number of sites and species the subject of national statutory protection and a significant number of habitats and species which contribute to Harrow's natural environment.

Designates Sites

4.60 *Sites of Special Scientific Interest* - Bentley Priory Open Space and Harrow Weald Common are Sites of Special Scientific Interest (SSSI) and are therefore afforded statutory protection.

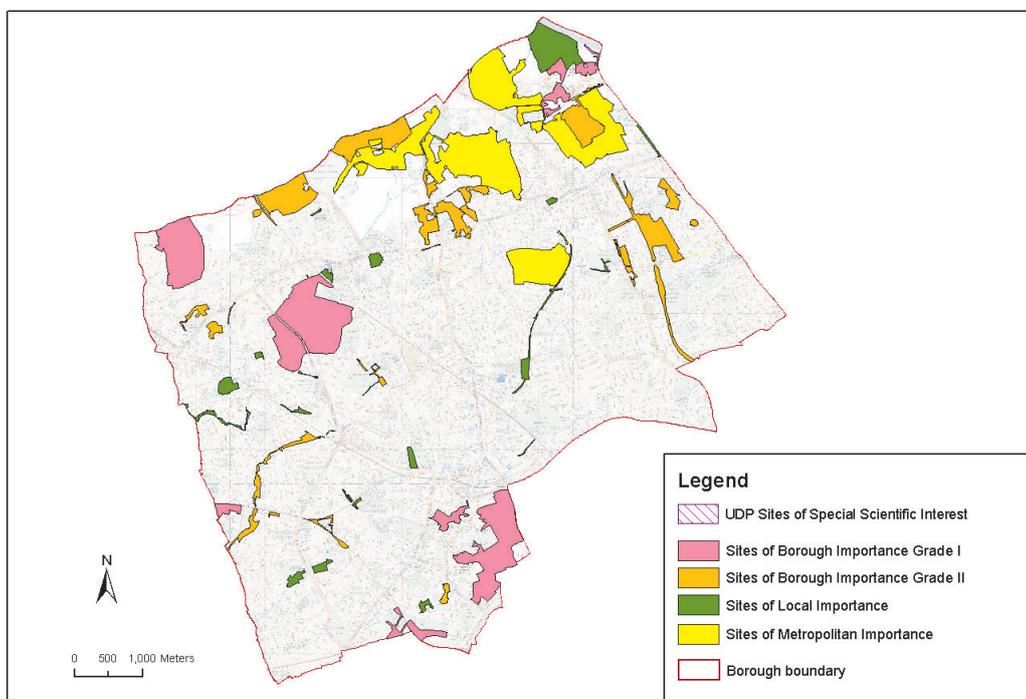
4.61 *Local Nature Reserves* - Bentley Priory Open Space, Stanmore Common and Stanmore Country Park are Local Nature Reserves. This is a statutory designation for sites of local but not necessarily national importance (although, as with Bentley Priory Open Space, they can also be an SSSI and have other designations).

4.62 *Sites of Importance for Nature Conservation Importance* - In addition to the above statutory designation there are 30 adopted Sites of Importance for Nature Conservation Importance (SINCs) in Harrow. SINCs are graded as follows:

- Sites of metropolitan importance are those which contain the best examples of London’s habitats;
- Sites of borough importance are those which contain the best examples of borough habitats and are classed grade I and grade II; and
- Sites of local importance are those of particular importance to neighbouring residents and schools.

4.63 Harrow has 6 sites of metropolitan importance, 6 sites of borough importance (grade I), 11 sites of borough importance (grade II) and 7 sites of local importance. In addition a further 14 sites have been put forward to the Greater London Authority for adoption comprising 3 sites of borough importance and 11 sites of local importance. Refer to map 4.4 (below).

Map 4.4 Sites of Nature Importance



Habitats

4.64 The Council's Biodiversity Action Plan (2008), developed in conjunction with local resident and interest groups, has identified 9 important habitats in Harrow. The Action Plan explains that the selection criteria for the identification of these important habitats includes: all UK priority habitats present in the Borough, habitats which form a significant proportion of the London resource, locally important habitats (such as those of rare/historical value, which are threatened or declining, and those which can be effectively enhanced locally), habitats which are important for key species and habitats distinct to the Borough.

4.65 *Bare Ground Habitats* - Bare ground habitats occur in areas of bare rock or thin, nutrient poor and drought prone soil. Such habitats support mining bees, solitary wasps and kingfishers amongst other species. In 2003 twenty-five bare soil and rock locations were found identified in Harrow, 13 of which were located within Sites of Nature Conservation Importance. Bare ground habitat sites are prone to human recreational activity, contamination, poor management, soil type, development of brownfield land, public perception and climate change.

4.66 *Dead Wood Habitats* - Dead wood provides conditions upon which 13% of native animal and fungal species are dependant upon at some point in their life cycle; in total almost 5,000 British species are known to be associated with dead wood. In Harrow, dead wood habitats can be found in nature reserves, parks, and on private estates & gardens. The conservation of dead wood *in-situ* can also have secondary environmental benefits (reduced transport, no burning or landfill). Dead wood habitats are prone to under appreciation, woodland reduction or fragmentation (such as clearing paths/areas for recreational use), woodland management and health or safety requirements.

4.67 *Garden Habitats* - Private and public gardens and allotments provide a haven for a wide range of wildlife in urban areas including, for example, birds, butterflies, stag beetles and other invertebrates. The value of gardens for wildlife is thought to be higher if the garden is large, adjoins neighbouring existing habitats or contains a variety of habitats such as ponds/long grass/dead wood etc. The total land area of gardens in Harrow is not known but the largest gardens tend to be located in the north of the Borough. Garden and allotment habitats are prone to management, pesticide/herbicide use, development pressure/off-road parking, fragmentation (affecting the collective value of gardens as wildlife corridors) and climate change.

4.68 *Grassland Habitats* - Grassland is a sensitive habitat requiring ongoing management. If left unmanaged all grassland habitats will naturally develop into scrubby vegetation and then woodland. Grassland habitats support such species as Yorkshire fog grass, buttercup, grass snake and grasshopper. In 2003 the following grassland areas were identified in Harrow:

- 21 acid grassland areas
- 9 improved or re-seeded agricultural grassland areas
- 18 neutral (herb rich) grassland areas
- 51 neutral (semi-improved) grassland areas
- 35 tall herbs grassland areas

4.69 Grassland habitats are prone to management, soil enrichment, use of herbicides, public perception, decline in grazing, management costs, climate change, human and domestic animal disturbance, public access/recreation, vandalism and fragmentation.

4.70 *Heathland Habitats* - Like acid grassland, heathland develops on nutrient poor acidic soils and therefore it is common for grassland and heathland to be found on the same sites. Heathland habitats support such species as heather, gorse, bumblebees and solitary

wasps. The only significant heathland site in Harrow is Stanmore Common; small areas of heathland were also found at Harrow Weald Common in 2003. Heathland habitats are prone to succession, site management, eutrophication^(f) (mostly through atmospheric pollution) and climate change.

4.71 *Park and Amenity Habitats* - Parks and amenity areas provide an important feeding and nesting resource for wildlife, particularly those with older trees and dense berry-bearing bushes. Short grass allows grazing birds to feed on soil invertebrates. Notable species are oak, ox-eye daisy, garden spider and grasshopper. The network of gardens around parks are as important ecologically as the park itself. There are 20 open spaces within Harrow considered to be parks or recreation areas, some of which overlap designated Sites of Nature Conservation Importance. Parks and amenity area habitats are prone to: direct loss to development, a desire to reduce maintenance costs, increased public use, pesticides and unsustainable practices, traditional park management and public perception.

4.72 *Standing and Running Water Habitats* - A standing water habitat is any area of non-flowing water including seasonal ponds. Types of standing water in Harrow are lakes, ponds, balancing ponds, ditches and wetland margins. Shallow water ponds tend to be the best habitats for wildlife. Harrow has the highest density of ponds in London at 16 per sq. kilometre and includes: Canons Lake, Edgware; Summerhouse Lake, Bentley Priory; Squires Lake and Serpentine Lake at Harrow School. The majority of ponds are thought to be located in private gardens.

4.73 Running water habitats include rivers and streams. There are 75.8km of ordinary watercourse running through Harrow (of which 37km is culverted) and 15.58km of main river (2.84km culverted). Rivers and streams can also act as important wildlife corridors. Notable species that can be found in standing and running water habitats include marsh marigold, willow, dragonfly and kingfisher. Standing and running water habitats are prone to: direct loss (such as the removal or silting of ponds), stocking of ponds with fish, habitat isolation, invasive species, misconnections of foul sewage to surface water drains, fly tipping, climate change, development pressure, pollution and disturbance.

4.74 *Wasteland Habitat* - Wasteland sites are typically unmanaged and can support a variety of different habitats e.g. bare ground, sparse vegetation, grasses, wild flowers etc. Consequently such sites may support a variety of different species such as nesting and foraging birds, butterflies, wasps and reptiles. Notable wasteland habitat species include the common lizard, ground beetles, rosebay willow herb and teasel. The single most significant threat to wasteland sites is development; the Action Plan recognises that some development on brownfield sites in Harrow is inevitable but notes that appropriate mitigation can reduce the negative impact on wildlife. Other threats include lack of knowledge about the wildlife value of such sites, disturbance, contamination and illegal activity.

4.75 *Woodland Habitats* - In Harrow there is 4.8ha of coniferous woodland, 244.4ha of native broadleaved woodland and 35ha of non-native broadleaved woodland. The majority of Harrow's woodland is classified as 'recent secondary' – having grown up in the last 50 years on what were previously open grazed commons and farmland. However Heriot's Wood at Bentley Priory and Pear Wood are thought to be ancient, dating from at least 1600. Notable woodland species include hornbeam, aspen, chaffinch and white letter hairstreak. Woodland habitats are prone to inappropriate management, climate change, public access/recreation pressure, domestic animal disturbance, vandalism and invasive species.

f eutrophication is chemical enrichment

Species

4.76 The Council's Biodiversity Action Plan (2008) notes that many species will be conserved as a result of works to the habitats which they relate to. Nonetheless some species have been singled out for specific action which, as with habitats, have been identified in relation to particular criteria (all London priority species, species unique to London and/or the Borough, local issues, etc.).

4.77 *Bat Species* - All British bat species are protected in law and in addition it is an offence to damage or disturb bat roosts whether occupied or not. In Harrow the following bat species have been recorded: Common Pipistrelle, Noctule, Vespertilionidae, Brown Long Eared and Natterer's bat. Although there is no local information about the state of the bat population nationally bat populations are declining. Bats roost in a variety of locations, including buildings, caves, mines or in cracks and hollows of trees. Bats prefer to fly along linear features, such as hedgerows and tree lines, and feed on insects either caught in flight or picked from water, ground and foliage. Bats are prone to loss of roost sites, loss of feeding habitat and disturbance to commuting routes.

4.78 *Heath Spotted Orchid Species* - The Heath Spotted Orchid is listed as an endangered species and is therefore afforded legal protection. It is illegal to uproot the plant without permission. Harrow holds the only London population of the Heath Spotted Orchid. Heath Spotted Orchids are prone to disturbance, succession, site management and hybridisation.

4.79 *Southern Wood Ant Species* - The Southern Wood Ant Species is identified as a 'lower risk – near threatened' species. Harrow's colony at RNOH in Stanmore is one of only two in Greater London and the nearest neighbouring colony is at Burnham Beeches in Buckinghamshire. Southern Wood Ant colonies are prone to disturbance and population decline.

4.80 *Reptiles and Amphibian Species* - A wide variety of amphibians and reptiles have been observed in Harrow. Both hibernate in winter months; amphibians usually hibernate under damp leaves, rotting logs or in underground tunnels. Reptiles hibernate underground using disused mammal burrows, inside buried stonework, deep within grass tussocks or among tree roots. In spring they return to their water breeding grounds. All native species of amphibians and reptiles are protected (at various levels) in law. Reptiles and Amphibian Species are prone to loss of habitat, stocking ponds with fish and habitat isolation.

Historic Environment

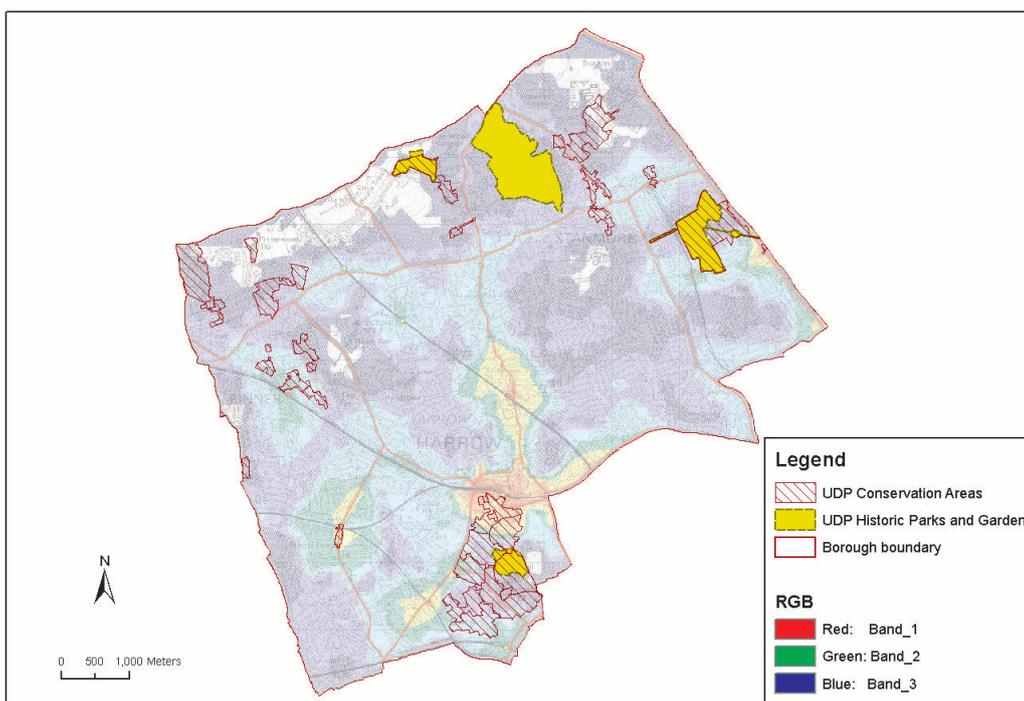
Objective 4 of the SA Scoping Report seeks to ensure that the Borough's historic environment is maintained and enhanced including its historic landscape and streetscape, listed buildings, conservation areas, archaeological sites and priority areas and culturally important features.

4.81 The Borough of Harrow incorporates a number of historic settlements – notably Harrow-on-the-Hill, Pinner, Stanmore, Hatch End and parts of Edgware. There are in total 28 conservation areas, over 300 listed buildings and an extensive list of buildings of local importance. Harrow also has 9 scheduled ancient monuments, 9 archaeological priority areas, 4 historic parks and gardens and 1 regionally important geological site. A number of important views have been identified across the Borough.

Conservation Areas

4.82 As noted above there are 28 conservation areas in the Borough and the geographical distribution of these is shown on the map below. The areas cluster strongly over and around the historic centres: there are 8 conservation areas covering Harrow-on-the-Hill, 13 areas in and around Pinner, 4 areas in and around Stanmore and 2 at Edgware. Of the remaining 3, two are located in the Green Belt and one at Rayners Lane. The Council keeps existing areas under review and considers from time to time whether other parts of the Borough should be designated as conservation areas.

Map 4.5 Conservation Areas, Historic Parks and Gardens

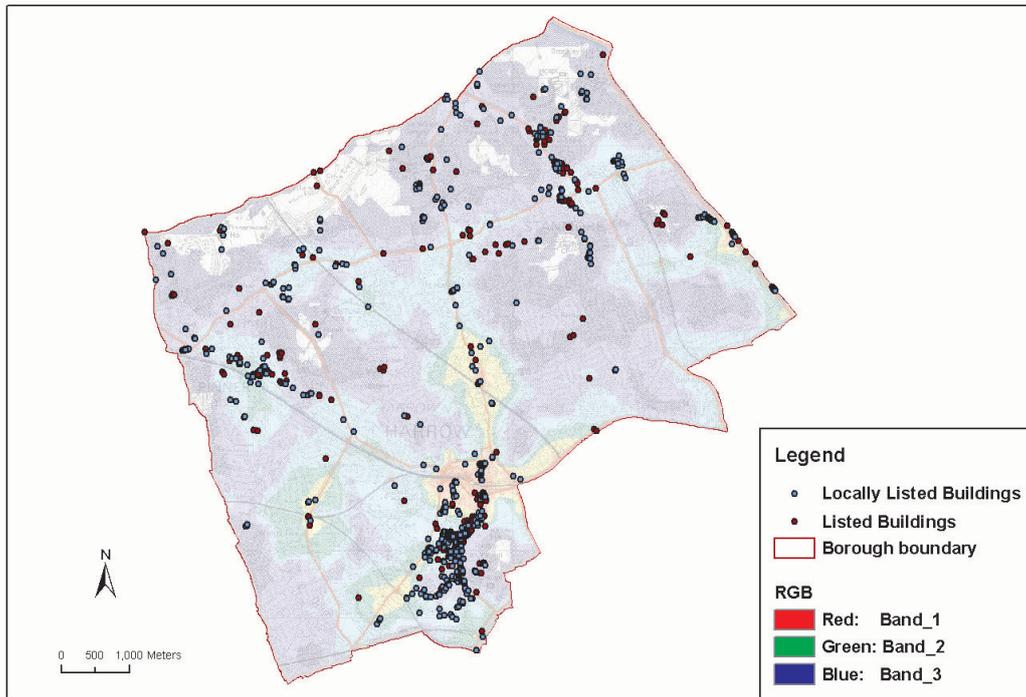


4.83 There are currently 28 Conservation Areas in the Borough and these have been grouped into four broad areas: Harrow on the Hill, Pinner, Stanmore & Edgware, and Harrow Weald. Supplementary Planning Documents covering the Harrow on the Hill group of conservation areas and the Pinner group of conservation areas were adopted in 2008 and 2009 respectively, and draft Supplementary Planning Documents for Stanmore & Edgware and Harrow Weald are programmed for public consultation during 2012. The Supplementary Planning Documents give effect to character appraisals and management strategies that have been prepared for 25 of the Conservation Areas.

Listed Buildings

4.84 Of the 300+ listed buildings in the Borough, four are grade I and 16 are grade II*. Refer to Map 4.6 (below) showing the clusters of statutory and locally listed buildings in Harrow.

Map 4.6 Listed Building



4.85 There are seven listed buildings on the 2011 London Heritage at Risk register in Harrow. They are:

- Brick Kiln, The Kiln, Common Road, Stanmore (grade II) (condition: very bad)
- Cannons Farm Barn, Hereford Gardens, Pinner (grade II) (condition: fair)
- The Hermitage, Kenton Lane, Harrow Weald (grade II) (condition: poor)
- Boundary wall fronting 118-128 Stanmore Hill, Stanmore (grade II) (condition: poor)
- Boundary wall fronting 173 Stanmore Hill, Stanmore (grade II) (condition: poor)
- Bentley Priory central entrance block, The Common, Stanmore (grade II*) (condition: fair)
- The Rayners Public House, Village Way East, Rayners Lane (grade II) (condition: fair)

Historic Parks and Gardens

4.86 The English Heritage List of Historic Parks and Gardens identifies four such sites in Harrow:

- Grimsdyke Hotel Gardens, Stanmore
- Canons Park, Edgware
- Harrow Park (formerly Flambards), Harrow on the Hill
- Bentley Priory, Harrow Weald

4.87 In addition the Council has begun compiling a local register of Parks and Gardens which are considered to contribute to the character and local heritage of their area. The list comprises two sites: Bernays Gardens in Stanmore and Pinner Memorial Park.

4.88 Map 4.5 (above) also shows the Borough's historic parks and gardens (see 'conservation areas'). The 2010 London Heritage at Risk register identifies the Bentley Priory historic park and garden as being at risk.

Scheduled Ancient Monuments, Archaeology & Geology

4.89 Scheduled Ancient Monuments are archaeological features designated by the Government as being of national importance and, as with conservation areas and listed buildings, are subject to statutory protection. There are nine scheduled ancient monuments in Harrow (of these the Council has produced guides for Pinner Deer Park and Grim's Ditch).

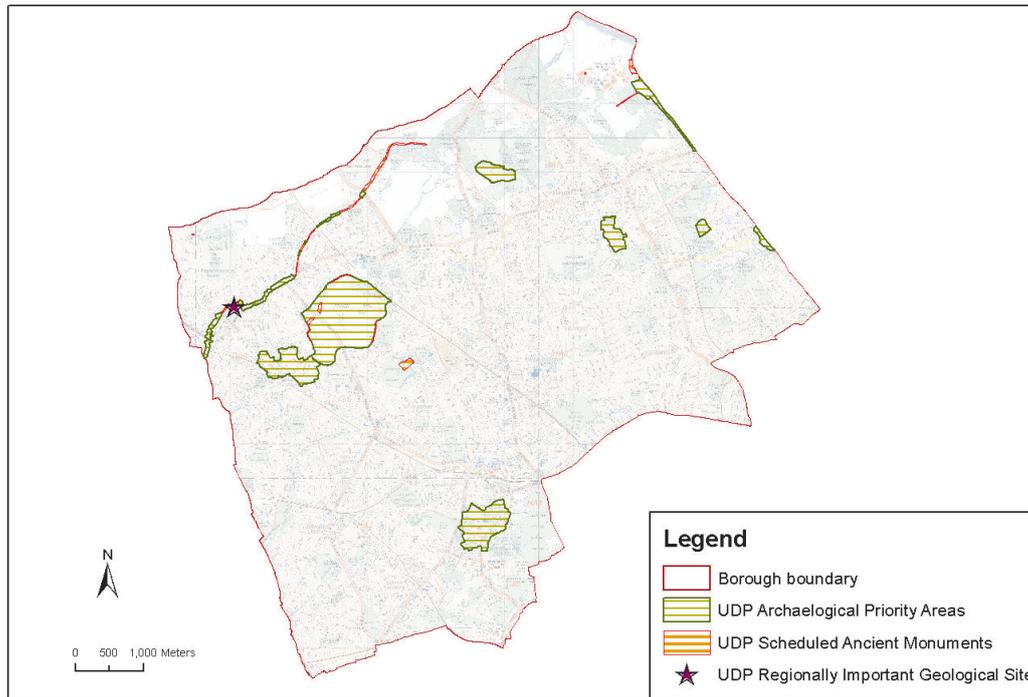
- Grim's Ditch: section 1370 metres north east from Oxhey Lane
- Grim's Ditch: section north of Blythwood House
- Grim's Ditch: four linear sections between Uxbridge Road and Oxhey Lane
- Pear Wood: linear earthworks
- Brockley Hill: obelisk
- Brockley Hill: Romano-British pottery and settlement
- Headstone Manor: moated site
- Pinner Hill: ice house
- Pinner Deer Park, Pinner Park Farm: park boundary

4.90 The 2011 London Heritage at Risk register identifies five of Harrow's scheduled ancient monuments as being at risk. They are Grim's Ditch (all three sites), Pear Wood earthworks and Pinner Deer Park. All of the sites are recorded as having a generally satisfactory condition but with significant localised problems.

4.91 In addition to the scheduled ancient monuments there are a further nine archaeological priority areas in Harrow; these are areas of more local significance. The Greater London Sites and Monuments Record provides a computerised record of information relating to London's archaeological and historic fabric. Advice and guidance on archaeological matters can also be obtained from the Greater London Archaeological Advisory Service. There have been many finds from the investigation of sites in Harrow and more are anticipated.

4.92 The location of Harrow's Scheduled Ancient Monuments and Archaeological Priority Areas are shown on Map 4.7 (below). The location of the Borough's only regionally important geological site – the Pinner Chalk Mines – is also shown on the map.

Map 4.7 Schedule Ancient Monument and Archaeological Priority Areas



Townscape and Important Views

4.93 Aside from the historic development associated with the Borough’s original village settlements much of Harrow comprises suburban development dating from the 1920s and 1930s. The importance of this inter-war development is increasingly being recognised; many such areas provide high quality residential environments through all or combinations of well designed buildings, gaps and spaces, verges, layout, use of topography and landscaping, views and landmark buildings such as schools. The Council is carried out a survey to characterise and categorise these areas in 2009/10 and this forms the basis for Harrow’s Character Study (2011).

4.94 There are two important aspects to Harrow’s topography. Firstly, as an outer London Borough located within the north-west section of the Capital, it forms part of the River Thames basin with generally rising levels from the south-east to the north & north-west. Secondly, Harrow Hill forms a dominant outcrop of high ground to the south of the Borough. As a result of this topography there are strong views both out of the Borough and within the Borough, which were recently reviewed and updated in Harrow’s Views Assessment (2012).

Access to Historic Buildings and Cultural Sites

4.95 During Open House weekend 12 of Harrow’s historic and culturally important buildings were accessible to the public. These included Grim’s Dyke Hotel, Headstone Manor, Harrow Art Centre, Harrow School, Museum of Harrow School Life, All Saints’ Church, Pinner House, St. Lawrence Church and the Zorastrum Centre. Some of these sites are open to the public at other times of the year.

4.96 Harrow Museum, at Headstone Manor tithe barn, is open to the public throughout the year and provides exhibition space and a stage for local musicians and other cultural activity. The Council's records show that there were 324 visits to Harrow's museum per 1,000 population in 2006/07 (including web visits) and 248 pupil visits in school groups.

4.97 There are 10 general public lending libraries in the Borough at Rayners Lane, Pinner, North Harrow, Kenton, Hatch End, Edgware, Harrow, Wealdstone, Stanmore, South Harrow. In addition the central Reference Library for the Borough is located at the Civic Centre. Special library services are provided for children and the housebound.

Air Quality & Climate Change

Objective 5 of the SA Scoping Report seeks to ensure that air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions or greenhouse gasses and other pollutants (including air, water, noise, vibration and light)

4.98 Harrow Borough is designated as an air quality action area and accordingly the Council has put in place air quality monitoring systems. In 2007 the Council signed the Nottingham Declaration, a pledge which recognises climate change and the need for action to combat it.

Air Quality

4.99 The levels of NO₂ are recorded at four sites in the Borough designed to be representative of public exposure. Sites 3, 4 and 5 have met the annual objective (40 µg/m³) every year since 2001 (these sites are all either intermittent or background locations). However, Site 1, the location closest to the roadside, has had a consistently higher reading, and in 2010 the mean level was 0.3 µg/m³ above the target level.

4.100 Pollution from transport and particularly from car use is recognised as a dominant factor affecting air quality, particularly in London where there are generally higher traffic levels and proportionately fewer polluting industrial processes than elsewhere in the UK. Car ownership levels in Harrow are higher than the national average and are the third highest levels in London. At the 2001 Census over 50% of Harrow's residents recorded that their mode of travel to work was car or van and a third had access to two or more cars.

Climate Change

4.101 There is limited baseline information on the energy consumption and efficiency levels of existing and new development in Harrow. 28 solar hot water systems were installed into owner occupied housing under the Heating Harrow Greener scheme during 2008/09; in addition the Council is aware of many more schemes that did not need planning permission which included solar panels.

4.102 During 2006/07 the Council installed raised solar panels at its Civic Centre complex and made a contribution of £25,000 to run a pilot scheme to install five solar thermal systems in properties. It has also joined the Warm Zones West London Scheme, which aims to apply the thermal comfort of the Government's Decent Homes standard in private sector housing, and is working with Scottish-Southern to provide solar hot water and micro wind turbine as part of a renewable energy scheme. The Sustainable Building Design SPD guides development to reduce CO₂ emissions and design more sustainable buildings.

Natural Resource Use

Objective 6 of the SA Scoping Report seeks to reduce pollution of land and ensure that contaminated land is remediated

4.103 Contaminated land is dealt with under Objective 1 above. This objective therefore focuses on Harrow's use of natural resources and the impact on land quality; it should be noted that there are no active landfill sites and no mineral workings in the Borough.

4.104 There is very limited baseline information about the level of consumption of natural resources in Harrow. However the amount of waste generated might be considered an indicator of levels of consumption. In 2000/01 the amount of household waste generated in Harrow was 88,321 tonnes and this increased each year to a peak of 105,331 tonnes in 2004/05, dropped to 100,259 tonnes in 2005/06 and had decreased to 88,326 by 2010/11.

4.105 The amount of commercial waste generated in Harrow has decreased. In 2006/07 there was 10,100 tonnes of commercial waste collected by the Council, a further 2,511 tonnes commercial waste and 5,571 tonnes of construction & demolition waste was delivered to the Civic Amenity Site. In the 2010/11 period the amount of commercial waste collected was 6,760 tonnes, 741 tonnes commercial waste and 3,695 tonnes construction and demolition waste was delivered to the Civic Amenity Site; the decrease in construction and demolition waste between 2006/07 and 2010/11 can be partly attributed to the increased Landfill Tax .

4.106 There are no fixed aggregates or concrete processing or aggregate making plants/equipment in the Borough. Nor does Harrow have any permanent concrete crushing equipment; however two concrete crusher's permits were issued in 2005/06 for mobile facilities which have continued to be used across the Borough. There is no information on the amount of resulting material re-used on site for footings & foundations and the amount transported from sites. A new Joint Waste Plan is being developed between the six West London Boroughs to manage waste up to 2025.

4.107 Further details on waste and recycling are addressed at Objective 9 below.

Water Quality & Flooding

Objective 7 of the SA Scoping Report seeks to improve water quality and reduce the impact of flooding

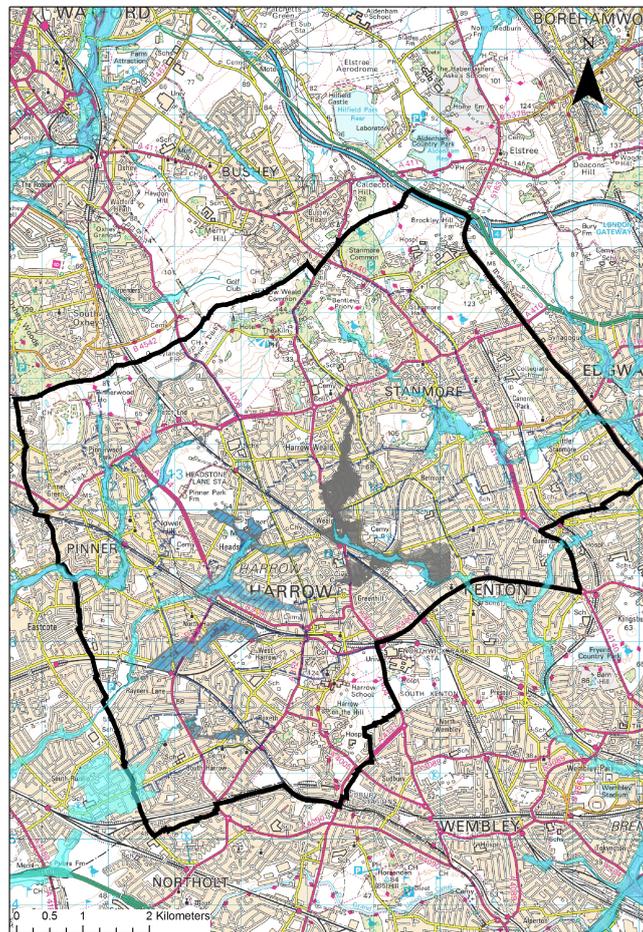
4.108 Water in Harrow is supplied by the utility company Veolia Water. There are four statutory reservoirs in the Borough but only one, at Harrow-on-the-Hill, supplies drinking water; the others are: Summerhouse, Bentley Priory; Severn Acre, Edgware; and George V, Pinner. There are no known private water supplies for domestic consumption but 3 are known for commercial/industrial purposes at Kodak Ltd. Within the Borough the River Pinn, Woodridings Brook, Yeading Brook, the Roxbourne, Wealdstone Brook and Edgware Brook are all classified as main rivers; other 'ordinary' water courses include the River Colne, Costons Brook, Kenton Brook and Smarts Brook.

4.109 In 2009 the Council published a 'level 1' Strategic Flood Risk Assessment to identify and map the extent of flood risk from main rivers, ordinary watercourses and other sources across the Borough. In 2011 a 'level 2' Strategic Flood Risk Assessment was published to model in greater detail the flood behaviour of the Wealdstone Brook, affecting the north part of the Harrow & Wealdstone Intensification Area. This Level 2 Assessment is now the subject of an addendum

report which removes from the Wealdstone Brook flood map the extent of functional floodplain previously modelled, as this is considered to be an inappropriate designation within an urban area and inconsistent with objectives for the regeneration of Wealdstone as part of the Intensification Area. The Strategic Flood Risk Assessments apply the sequential assessment to potential development sites that the Council has considered allocated through the development plan process (including some sites previously considered but not included in the pre-submission development plan documents) and provide the basis for applying the exception test to sites where this is necessary.

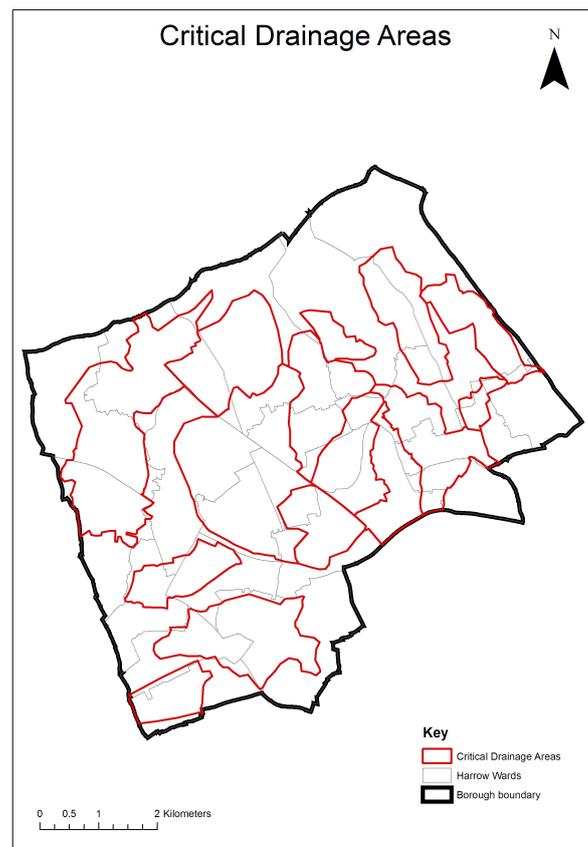
4.110 The addendum report also recognises that the conservative modelling decisions used to produce the flood map for the Wealdstone Brook are likely to have resulted in a 'worst-case' or overestimation of predicted flood extents which does not reflect historic records. The report recommends that more detailed, site specific modelling may be required to inform the assessment and management of flood risk at development sites within the Intensification Area.

Picture 4.1 Flood Zones 2 and 3 in Harrow



4.111 In 2012 the Council published a Surface Water Management Plan. This identifies 16 critical drainage areas, being areas particularly susceptible to surface water flooding. Collectively these areas cover the majority of the Borough's urbanised land area.

Map 4.8



Water Use

4.112 There is no baseline data specific to Harrow on the level of water consumption by households and businesses. However the average person in the UK uses around 150 litres of water per day; 33% of all household consumption of drinkable water is used for toilet flushing.

4.113 Veolia Water, which serves Harrow amongst other areas, states that the daily demand for water per person is 8% above the national average; the company also states that it has seen lower demand by some commercial customers in recent years. Turning to the future, the company expects overall demand to increase by 11% over the next 25 years taking into account population & housing growth, increased household water consumption as incomes rise & climate change takes effect, and efficiencies that will be delivered as a result of greater awareness and regulations. Projections by Veolia Water shows that the company expects to have sufficient water resources until 2024.

General Flooding Problems in Harrow

4.114 The Council's Strategic Flood Risk Assessments (see above) identify river (or fluvial) flooding, ground water flooding and surface water flooding as the principal flood hazards in the Borough. River flooding occurs when high levels of rainfall cause rivers to burst their banks (see section below).

4.115 Ground water flooding occurs particularly around the areas of Harrow Weald, Stanmore, Hatch End and Pinner following heavy rainfall in winter months, when local aquifers fill and drain into winterbourne streams, increasing discharge into the local sewer networks.

4.116 Surface water flooding results from heavy rainfall that is unable to drain away. Harrow's Surface Water Management Plan (2011) estimates that approximately 80,000 residential properties and 8,000 non residential properties in the Borough could be at risk of surface water flooding to a depth of greater than 0.1m during a 1 in 100 year rainfall event. Of these, approximately 300 residential properties and 70 non-residential properties could be at risk of flooding to a depth of greater than 0.5m during the same event. The widespread use of impermeable surfaces is adding to this problem. Again Pinner and Hatch End are susceptible to high levels of surface water flooding; river flooding at the top of Harrow's catchments may exacerbate the degree of surface water flood risk in these areas. Other localised flooding problems are caused where open sections of river and surface water drain outflows enter culverted sections of river and where blockages in culverted sections occur.

4.117 Within Harrow over 98% of surface water drains into a watercourse; there are few combined sewer and surface water drains. However foul water flooding is caused when sewers become blocked or overloaded, spilling out into surrounding property or crossing into surface water systems, and as a result of misconnected waste outfalls. Foul flooding is a particular problem along the Wealdstone Brook.

Rivers and Flooding

4.118 Harrow's has prepared a strategic flood risk assessments identify three primary river catchments within the Borough:

Brent Catchment

4.119 Within Harrow Borough the main tributaries of the Brent are the Silk Stream (also known as the Edgware Brook), Wealdstone Brook and Kenton Brook.

4.120 The Silk Stream flows through the Harrow Borough wards of Stanmore Park, Belmont, Canons, Queensbury and Edgware. Flooding frequently occurs and in 1992 severe flooding affected over 450 properties. The Silk Stream Flood Alleviation Scheme, currently under construction, seeks to control flooding up to a 1 in 100 year flood event through the creation of flood holding areas at various points upstream within the catchment areas: Summerhouse Lake, Bentley Priory; Stanmore Park; Whitchurch Playing Fields; Prince Edward Playing Fields and Canons Park Lake. The Silk Stream flows into the neighbouring Borough of Barnet.

4.121 Wealdstone Brook flows through the Harrow Borough wards of Wealdstone, Marlborough and Kenton West. The Brook was upgraded with brick and concrete channels designed to hold a 1 in 50 year flood event between 1976 and 1990; however an Environment Agency investigation in 1998 concluded that the defences were more likely to protect only against a 1 in 25 year flood event. The Wealdstone Brook flows into the neighbouring Borough of Brent.

4.122 Kenton Brook enters Harrow from the neighbouring Borough of Barnet, flows as an open river through Kenton East Ward before entering the neighbouring Borough of Brent. Residual surface water run-off and fluvial flooding occurs, although flood storage is provided to the rear of gardens in Clifton Road.

River Pinn Catchment

4.123 The top of the River Pinn runs through Harrow Borough as does its tributary, Woodridings Brook.

4.124 The River Pinn starts at Harrow Weald Common and flows through the Harrow Borough wards of Hatch End, Headstone North, Pinner and Pinner South. Both the River Pinn and its tributary, Woodridings Brook, give rise to residual surface water run-off and fluvial flooding occurs; there is flood storage reservoir at George V Avenue and deculverting has been carried out at Hatch End playing fields. The River Pinn runs into the neighbouring Borough of Hillingdon.

Crane River Catchment

4.125 Within Harrow Borough the main tributaries of the Crane are the Yeading Brook and The Roxbourne.

4.126 Yeading Brook has its own tributaries around the area of Headstone Manor, where they confluence and run in culverted and open sections through the Harrow Borough wards of Headstone North, Pinner South and Rayners Lane. Residual surface water run off and fluvial flooding occurs. The Brook runs into the neighbouring Borough of Hillingdon.

4.127 The Roxbourne (also known as Yeading Brook Eastern Arm) also has its own tributaries, rising at West and South Harrow and lead through open and culverted sections to the confluence at Newton Farm Ecology Park. The Roxbourne flows open from this point through the Harrow Borough ward of Roxbourne into the neighbouring Borough of Hillingdon. Residual surface water run off and fluvial flooding occurs.

Sustainable Energy Use

Objective 8 of the SA Scoping Report seeks to promote development that ensures the sustainable use of energy

4.128 As noted above under climate change there is limited baseline information on the extent of current energy use in Harrow. However, the Government's Standard Assessment Procedure (SAP) is a system used to score the energy performance of buildings taking into account the fuel efficiency of heating systems and the thermal efficiency of the building fabric. The findings of the 2005 English House Condition Survey Annual Report, tabulated in a joint memorandum by CLG, DEFRA, BERR and DIUS (Communities and Local Government Select Committee – The Existing Housing Stock and Climate Change Inquiry), shows the energy performance for dwellings by house type; against this criteria the proportion of dwellings with a SAP rating of less than 30 (indicating poor energy efficiency) and more than 60 (indicating relatively good energy efficiency) are given.

4.129 Using this information and 2001 Census data about house type in Harrow it is possible to make a crude assessment of the energy efficiency of the existing housing stock in the Borough.

4.130 In 2001 there were 9,877 detached houses and bungalows in Harrow, representing just over 12% of the Borough's stock at that time. It is assumed that most of these will be in private ownership. The 2005 English House Condition Survey indicates that 16.9% of detached houses have a SAP rating of 30 or less, whilst only 13.9% have a SAP rating of 60 or more.

4.131 As might be expected, the largest proportion of Harrow's stock at the 2001 census was recorded as semi-detached houses and bungalows – 32,309 units representing 40% of total stock. The Condition survey indicates that 10% of semi-detached houses have a SAP rating of 30 or less and 10.8% have a SAP rating of 60 or more.

4.132 According to the survey 12.7% of end-terrace dwellings have a SAP rating of 30 or less, but 16.1% have a SAP rating of 60 or more. The performance of mid-terrace dwellings is better, being 5.4% and 23.7% respectively. The 2001 Census reveals that Harrow had 16,397 terraced houses and bungalows (including end terrace), equivalent to 20% of the total stock.

4.133 The Census results do not separate bungalows. However the 2005 Survey shows that 13.8% of bungalows have a SAP rating of 30 or less and only 9.8% over 60.

4.134 In terms of flats, the Census shows that there were 16,159 flats in purpose built blocks, 4,734 in converted buildings and 1,395 in commercial buildings; these represent just under 20%, 6% and 2% respectively of the total stock in Harrow. On the basis that most purpose built blocks in Harrow are low rise, the 2005 Survey shows that 3.1% have SAP ratings below 30 while 63.1% have ratings above 60. Converted flats perform less well, 17% having SAP ratings below 30 but only 9.9% having ratings above 60.

4.135 The 2005 Survey also provides a break down of performance based on age of dwelling and tenure. A breakdown of the age of stock in Harrow is not available but it is known that much of the Borough's housing dates from the inter-war period or earlier. As might be expected this older housing is less energy efficient; 11.4% of properties dating from the period 1919-1944 had a SAP rating of 30 or less, increasing to 23.9% in respect of pre-1919 housing. On the other hand, at 2001, 7% of Harrow's households rented from the Council, 4% from housing associations and 10.5% from private landlords; properties in these sectors typically perform better, between 12.6% and 43% having SAP ratings above 60.

4.136 The CLG, DEFRA, BERR and DIUS Memorandum concludes from its analysis of existing housing stock that large, irregularly-shaped detached houses are the least energy efficient and that mid-floor flats and mid-terraced houses the most energy efficient. It also notes that these findings are confirmed by the results for Energy Performance Certificates required in connection with the sale of 4-bedroom homes.

4.137 In the five years from 2001/02 a net total of 2,513 units were added to the housing stock in Harrow. New development will continue to be meet the more stringent requirements of the Building Regulations and it is noted that energy efficiency requirements will increase in forthcoming years in line with the requirements of the London Plan (in London) and the Building Regulations (nationally). Also the majority of new developments in Harrow in recent years have tended to be flats rather than houses.

4.138 The Government's Building Regulations Advisory Committee is also looking at the energy efficiency of existing non-domestic buildings. An update note dated 12th October 2007 includes the following emerging findings: that there is significant diversity in the energy performance of existing non-domestic buildings and consequently that it is more meaningful to assess buildings by business sector.

Waste

Objective 9 of the SA Scoping Report seeks to discourage the production of waste and promote further the waste hierarchy of minimisation, re-use, recycling and composting

Waste Management

4.139 As noted above, the combined amount of household and commercial waste generated in Harrow has decreased, and in the case of household waste the amount generated in 2008/09 remains below a peak of 105,331 tonnes in the year 2004/05. The amount of combined municipal, commercial and industrial waste requiring management in Harrow is projected to increase to 239,602 tonnes in 2015 and 281,511 tonnes in 2020.

4.140 In 2003/04 85% of Harrow's waste was sent to landfill, the remaining 15% being recycled. Steady year on year improvements have been made since this period; there have been modest improvements in the proportion of waste recycled but with improvements in the proportion of waste composted achieving more significant reductions in the proportion of waste being sent to landfill. In 2007/08 61% of Harrow's waste was sent to landfill sites outside the Borough, compared with 50% in 2010/11.

Recycling

4.141 The Council collects material for recycling directly from householders. Each household is provided with a bin for the disposal of organic waste for composting, which is collected weekly, and separate bins for the disposal of recycling material and general refuse which are collected on alternate weeks. During 2007/08 the Council introduced blue bins for flats and this has led to a significant and sustained change in the amount of waste being recycled and composted. Overall the Council achieved a composting and recycling rate of 43% in 2010/11.

4.142 Throughout the Borough the Council also provides bottle, glass, plastic/tin can and paper banks, public commuter bins for newspapers and general recycling bins in Harrow town centre. The number of recycling and waste recovery facilities increased in the year 2010/11 and in particular there were significant increases in the numbers of bottle, paper and can banks. Waste delivered to the Borough Civic Amenity site is also sorted for recycling.

Economy

Objective 10 of the SA Scoping Report seeks to facilitate the development of a dynamic and diverse economic sector which attracts growth

Local Economy and Employment Land

4.143 The highest concentration of businesses is around Harrow's town centres. The central strip of the Borough had the most businesses whilst the west side and south east of the Borough had relatively few. Kenton East has less than 1% of all Harrow's businesses. This indicates areas with fewer opportunities for local employment and facilities for residents.

4.144 However, between 1994 and 2008 the number of VAT registered firms across the Borough grew by around 26% which is comparable with the national rate of 25% but is below the average for London (42%) and Outer London (31%). With 70 VAT registrations per 10,000 population in 2007, the Borough's recent rate of new business formation is above that of Outer London (53) and Great Britain (42) suggesting above average entrepreneurial activity locally. (ELS 2009)

4.145 In 2010/11 the Borough experienced a loss of 4,653m² of employment floorspace (compared to a loss of 42,680m² in 2008) as a result of redevelopment or change of use to non employment uses. The Retail Study 2009, in assessing the quantitative need for convenience goods development, forecasts a need for 4,379m² net by 2020 and 24,00m² of additional comparison floorspace.

Employment

4.146 Harrow has a workforce of around 63,000 although the number of people employed in Harrow is projected to rise by 14,000 (16.5%) between 2001 and 2026.

4.147 Harrow also has a high proportion of its working age population in self-employment. 10.2% of Harrow's economically active residents were self-employed in 2008 compared to 12.4% in 2007 and 10.8% in 2006. The levels in 2008 for London's and England & Wales are 10.6% and 9.3% respectively. Of note, four of Harrow's wards have a particularly high rate of self-employment: Canons (19%), Hatch End (16.3%), Pinner (15.1%) and Stanmore Park (17.2%).

4.148 A sectoral analysis of employment in 2004 shows that 7.2% of Harrow's working population were employed in manufacturing; 5.5% in construction; 24.9% in distribution, hotels and restaurants; 4.1% in transport and communications; 25.9% in banking, finance and insurance; 27.3% in public administration, education and health; and 5% in other services. These patterns are broadly consistent with Harrow's comparator areas although the proportion of employment in public administration, education and health is relatively high.

4.149 Within the Borough there are some notable variations in employment structure:

- a high proportion of manufacturing employment in Marlborough ward (30.7%);
- a high proportion of construction employment in Kenton East (38.1%), Kenton West (17.8%) and Roxbourne (19.3%) wards;
- a high concentration of distribution, hotels and restaurants employment in Queensbury ward (45.3%);
- a high proportion of employment in banking, finance and insurance in the wards of Canons (35.9%), Edgware (35.5%), Greenhill (37.6%) and Roxbourne (40.2%); and
- a high concentration of employment in public administration, education and health in Canons (38.2%), Harrow-on-the-Hill (58.4%) and Harrow Weald (39.2%) wards.

4.150 Based on 2008 Annual Population Survey, 17.7% of Harrow's workers are categorised in the top SOC category - Managers & Senior Officials, compared to a peak level of 20.9% in 2007, still higher than England & Wales level at 15.9% but now the same as London. Five years ago, 14% of Harrow's workers were classified as Managers & Senior Officials.

4.151 Some 62% of the Harrow's employed population work outside the Borough, principally in central London and other parts of west London. There is a strong tendency for people working in managerial and professional occupations to be employed outside of the Borough. In terms of employment offered within the Borough, 30% is office based and located in/around Harrow town centre.

4.152 The 2001 Census reveals that, at that time, 46.4% of Harrow's working population drove to work by car or van and a further 3.2% were passengers in a car or van; 19.9% travelled to work by underground/metro, 4.9% by train and 7% by bus, minibus or coach. Other modes were motorcycle or scooter (0.8%), taxi or minicab (0.5%), bicycle (0.9%) and foot (6.3%). Within Harrow Greenhill and West Harrow wards recorded comparatively high levels of travel to work by underground/metro (24.9% and 26.9% respectively). The Census also reveals distance of travel to work: 13.6% travel less than 2km, 17.4% between 2km and less than 5km, 17.9% between 5km and 10km, and 27.1% between 10km and less than 20km. Those working mainly at or from home accounted for 9.9%.

Unemployment

4.153 Harrow has suffered a significant rise in unemployment over recent years reflecting the national recession. However, the Borough's unemployment remains well below the London (5.8%) and national (5.3%) rates. Levels of economic activity in the Borough are average with 76.5% of the working-age population being economically active, a rate below the British (78.8%) but above the London (75.7%) rates. The local workforce has above average level of job skills with the Borough having a higher proportion of graduates than the national average, albeit slightly lower than London's. The proportion of unskilled workers is also below both the London and national averages. Reflecting the relatively higher-skilled local workforce, resident wages per week for full-time workers in Harrow (£575) are well above the national average (£479) but similar to the London average (£581). As is typical for outer London Boroughs, average wages for those who work in Harrow are lower (£523) than those who live there, although this difference is particularly large in Harrow indicating a large number of workers commute out of the Borough to well-paid jobs elsewhere (Harrow Employment Land Study, 2010)

Income

4.154 Harrow's average annual household gross income in 2010 was £42,900, 3.7% higher than in 2009 and £2,400 higher than the mean household income for London in 2010. When data on equivalised income (an adjusted income scale, which takes account of the household size and composition) are used, Harrow's average household income is £37,000, which is at the same level as London's. 14% (around 11,600) of households in Harrow have a gross income of under £15,000 per year, 2,300 more households than 2009, an increase of 25%.

4.155 In February 2009, 2,690 lone parents were receiving benefits in Harrow, 2% of residents of working age. This is slightly below the level of the previous three years, at around 2.1% in 2007 and 2.2% in both 2006 and 2005. Harrow's rate is now the same as the rate for England & Wales, at 2%, but below the London average of 2.9%.

4.156 In November 2010, 2,170 lone parents were receiving benefits in Harrow. This constitutes 1.4% of residents of working age, which is a slight decrease from November 2009 when the level was 1.6%, and continues a downward trend established over previous years: 1.8% in 2008, 1.9% in 2007 and 2.1% over the previous six years. Harrow's rate is lower than the rate for England & Wales at 1.7%, and the London average of 2.3%. Changes in entitlement from November 2008, October 2009 and November 2010 will affect the comparability of the statistics.

4.157 Approximately 6,800 (4.4%) of Harrow's working age residents were in receipt of Employment & Support Allowance (ESA) and incapacity benefits in November 2010 and unable to work due to illness or disability. Both the number and proportion of Harrow's working age population on this benefit has remained fairly steady over the past five years at 4.5%. This is lower than London's average of 5.9% and England & Wales', at 6.6%, over this five year period.

Tourism

4.158 Estimates produced by the London Development Agency indicate that in 2006 there were 1,503,000 day visitors to Harrow and a total of 267,000 overnight visits (comprising 161,000 visitors from overseas and 105,000 domestic visitors). The total value of tourism in Harrow is thought to be £161million. Of the overnight visitors to Harrow the contribution from overseas tourists was £81million whilst £21million was spent by domestic tourists; the remaining £59million was spent by the day visitors.

4.159 By comparison with previous years (2004 and 2005) the total value of tourism to the local economy has increased, from £92.6million in 2004 to £160million in 2006. Overseas visitors account for approximately half of Harrow’s total tourism expenditure, with this figure rising from £71 million in 2004/2005 to £81 million in 2006.

4.160 As a proportion of total employment the contribution of tourism in Harrow (4.4%) is below that for London as a whole (over 4.8%).

Education & Skills

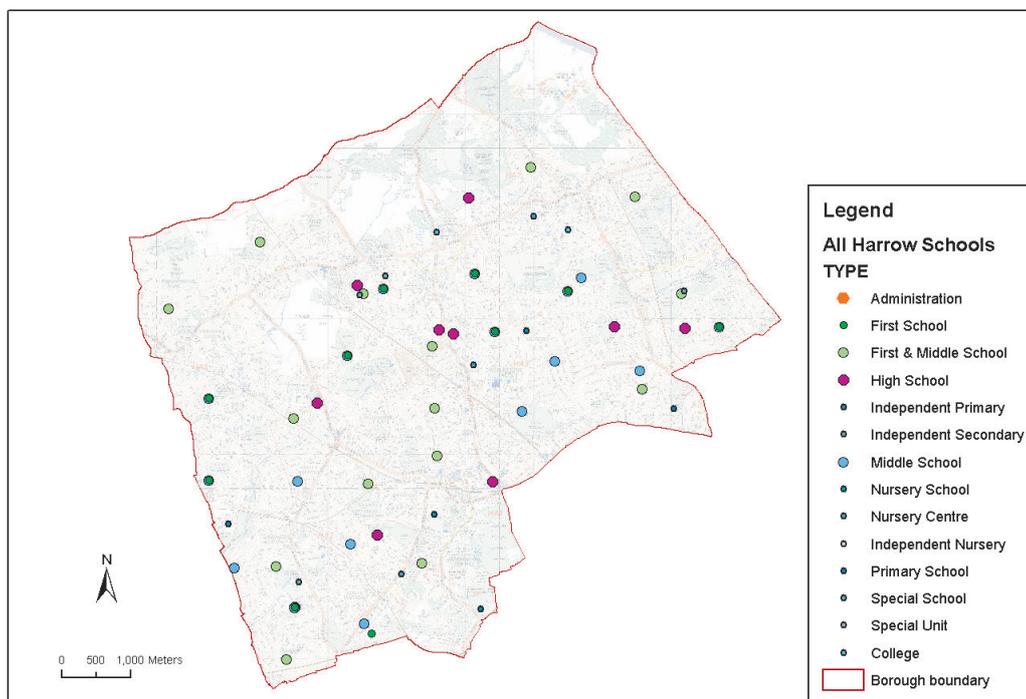
Objective 11 of the SA Scoping Report seeks to improve the education and skills of the Borough

Educational Provision

4.161 Harrow has 54 primary schools (9 voluntary aided), 24 of which have nursery class provision, and 4 special schools including one with nursery provision. There are 10 high schools (2 voluntary aided), 8 of which provide a sixth-form curriculum, and 3 colleges (Harrow College, St. Dominic’s Sixth Form College and Stanmore College).

4.162 The geographical distribution of Harrow’s schools are shown on Map 4.9 (below).

Map 4.9 Harrow School



4.163 Harrow has established Children's Centres to provide childcare services, learning opportunities for children and adults, childminder support and information & support for parents. These are provided at schools and centres in Harrow Weald (Cedars), Edgware (Chandos), North Harrow (Grange), South Harrow (Hillview), Kenton (Kenmore Park), Pinner (Pinnerwood), Stanmore (Stanmore Park) and Wealdstone (Gange & Wealdstone).

4.164 In addition to the above state and voluntary aided schools there are 12 independent schools in the Borough, most notably historic Harrow School at Harrow-on-the-Hill. Orley Farm School and the John Lyon School are also located at Harrow-on-the-Hill. Alpha Preparatory School, Buckingham College Senior School and Quinton Hall School & Nursery are located on Hindes Road, and the E Ivor Hughes Educational Foundation is located on nearby Hamilton Road – all in central Harrow. T C S Tutorial College & School of English is located in Willowcourt Avenue Kenton. Others are located at Stanmore (Peterborough & St. Margaret's School, Common Road), Headstone Lane (Papillion Montessorri Pre-School) and Rayners Lane (Regent College, Imperial Drive).

4.165 The Harrow campus of Westminster University is located just over the border from Harrow in the London Borough of Brent.

4.166 In 2012 the Council resolved to grant outline planning permission for the redevelopment of the former Kodak site in Wealdstone. The outline scheme includes the provision of a new primary school. The Council has also supported the formation of a new 'academy' to open in September 2012 on the former Teachers' Centre site in Wealdstone.

Workforce Skills

4.167 At the time of the 2001 Census 12.9% of the 16-74 age population in Harrow held no qualifications; 51.6% held GCSEs, A Levels and other school certificates; 17.6% held degrees; and 6.6% held NVQs. Four of Harrow's wards (Greenhill, Headstone North, Headstone South and Pinner South) had fewer than 10% of their population without any qualifications whilst one ward (Kenton East) had 20.6% of its population without any qualifications.

4.168 In 2003 the majority of Harrow residents held at least level 1 skills in literacy (87%), numeracy (50%) and ICT (60%). Ward level data indicates that, consistently across literacy, numeracy and ICT, five wards (Edgware, Kenton East, Queensbury, Roxbourne and Roxeth) had the highest proportion of their population holding only entry level skills. Poor English language skills amongst those for whom English is a second language and lack of childcare are cited by residents in these areas as major barriers to gaining employment.

Housing

Objective 12 of the SA Scoping Report seeks to ensure that all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents

Housing Supply

4.169 Housing constitutes the largest single component of the Borough's built environment (about 50%). There are around 85,400 dwellings in Harrow and almost two-thirds were constructed during the inter-war period. The majority of the existing housing stock consists of owner-occupied three-bedroom, two storey semi-detached houses. In recent years one and two bedroom flats have accounted for the bulk of the new dwellings.

4.170 75% of Harrow's housing stock was owner occupied in 2001, ranking Harrow fifth in London whilst 11.7% of Harrow's households lived in social housing in 2010/11. 5.3% of the Council's own housing stock failed to meet Harrow's Decent Homes Standard as at 31 March 2011, this is a massive improvement on the figure of 31% recorded for March 2010 and as of 31st March 2009 (CLG, Business Plan Statistical Appendix 2008/09) Harrow has the second

lowest level of social housing in London. Of the 85,390 dwellings in Harrow, 6% are council properties and 6% are owned by housing associations and so 88% of Harrow's dwellings are within the private sector, of which 12% are privately rented (Housing Needs and Supply Report 2008/09).

4.171 The overall provision of housing in Harrow is through new build, conversions and changes of use to residential to address the needs of the Borough.

4.172 A new London Plan has revised Harrow's housing target down to 350 per annum, alongside outlining a new approach to affordable housing, including a 60/40 split between affordable and intermediate housing.

4.173 In 2010/11 Harrow's Housing Department reported that 285 new affordable housing units became available. Of these, 222 (78%) were social rented homes and 63 (22%) were intermediate homes (shared ownership and Homebuy Direct). Over 55% of the social rented housing completions during the period were family sized (ie. 3 bedroom plus) against a target of 42%. Over 14% of affordable completions were wheelchair accessible against a target of 10%.

Housing Demand & Affordability

4.174 As noted above, the 2011 Census records the Borough's resident population as having reached 239,100 people and the number of households as being 84,300, with an average household size of 2.8 persons. By comparison the 2011 Census shows that Outer London's average household size has increased^(g) to 2.6 persons whilst that for London has increased^(h) to 2.5 persons. The average household size for England remains 2.4 persons.

4.175 The average house price within Harrow has increased since last year, following the general trend of house prices across London. The average cost of a home in Harrow is £290,515 which is £48,646 less than the London average and is a 9.2% rise on last year's average. Across most housing types the cost of housing in Harrow is slightly less than that of London.

4.176 In terms of rents, Harrow's Housing Needs Assessment (2006) reports average market weekly rents in the Borough of £196 for a one bedroom flat, £219 for a two bedroom flat, £265 for a three bedroom flat and £340 for a four bedroom flat. By comparison social weekly rents in Harrow were recorded as being £67, £80, £86 and £92 respectively.

4.177 As noted above Harrow's average annual household gross income in 2011 was £42,800 and, when adjusted to take into account household size, this figure falls to £37,000. The average Harrow house price for the period 2010/11 is therefore 7 times average household gross income and nearly 8 times equivalised household income. An assessment of 2004 house price to income ratio reveals that market prices in Harrow are less affordable than comparable boroughs.

4.178 The Housing Needs Assessment (2006) identifies a shortfall of affordable housing in Harrow and in particular a need for larger affordable housing for families (4+ bedrooms) to avoid family division or overcrowding. Meanwhile the Borough's stock of Council housing is diminishing year on year, albeit at a slow rate, as tenants exercise their right to buy.

g From 2.5 persons in 2001.

h From 2.4 persons in 2001.

4.179 The West London Strategic Housing Market Assessment (2010) produces a sub regional five-year requirement for 434,076 homes and identifies gross supply from all sources of 398,151, leaving an overall net shortfall (or requirement) of 35,924 homes. For Harrow, this produces an identified shortfall (or requirement) of 942 market homes, 148 intermediate homes and 655 social homes. In percentage terms, 54:8:38 respectively.

4.180 In 2005 there were 1,388 registered homeless in Harrow, equivalent to 1.7% of households in the Borough. At ward level Marlborough had the highest rate of people placed in temporary accommodation (42 per 1,000 households) followed by Wealdstone and Queensbury; Headstone North, Canons and Hatch End wards all had the lowest rates (5 or less per 1,000 households). Also in 2005 there were 3,182 people registered as being in housing need; again Marlborough and Wealdstone had the highest rates.

4.181 The Council's Homelessness Review (2008) reveals that the number of people in temporary accommodation was 1,058 as at 31st March 2008. The number of households in bed and breakfast accommodation was 14 at 31st March 2006 rising to 73 at 31st March 2008. The average household size in temporary accommodation is four and the average stay is 4.5 years. However the Review also shows that time spent in temporary accommodation is related to household size, with smaller households being rehoused more quickly (on average 2.4 years for a studio flat) whilst rehousing for larger households taking significantly longer (on average 5.9 years for a five bedroom dwelling).

Access to Housing & Services

4.182 In 2010 the Council revised a previously adopted supplementary planning document on accessible homes which seeks to encourage the provision of new housing up to 'Lifetime Home' standards and in addition the provision of 10% (up to a maximum of 10 units on any development) of units to 'wheelchair accessible' standards.

4.183 Barriers to housing and services is a deprivation measure based on a basket of indicators comprising household overcrowding, households waiting for a Council decision on their homeless status, obstacles to home owners and distance to GP surgery, shops, primary school and post office. Unlike other aspects of deprivation, most housing and services deprivation in 2004 in Harrow occurred to the north and more peripheral areas of the Borough.

Social Exclusion and Community Cohesion

Objective 13 of the SA Scoping Report seeks to reduce social exclusion and facilitate the development of mixed and balanced communities

4.184 Many of the characteristics that lead to social exclusion and which contribute to community cohesion are addressed in other objectives, such as access to open space (above), health and crime (below). This section will therefore focus on characteristics not dealt with by the other sustainability objectives: Borough accessibility; transport & development; and access to opportunities & services.

Borough Accessibility

4.185 Of the London Underground lines, the Metropolitan line from Aldgate and Baker Street stations serves central Harrow and the west of the Borough including Rayners Lane and Pinner on its way to Watford, Amersham and Uxbridge; the Piccadilly line from Acton and central London serves South Harrow and Rayners Lane on its way to Uxbridge; the Bakerloo line from South

London serves Kenton and terminates at Harrow & Wealdstone in the central area of the Borough; similarly the Jubilee line from Stratford and the City serves Queensbury (just outside the Borough) and Canons Park before terminating at Stanmore in the east of the Borough. The western branch of the Northern line terminates just over the border in Edgware.

4.186 Overland trains from London Euston station run alongside the Bakerloo line serving Harrow & Wealdstone and on to Watford Junction and Birmingham; these comprise a 'slow' metro service (which also calls at Kenton, Headstone Lane and Hatch End within the Borough) and a faster direct service to and from Euston. From London Marylebone station overland trains run through the Borough at Harrow-on-the-Hill on their way to Aylesbury and through Sudbury Hill and Northolt Park stations on their way to High Wycombe, Stratford-upon-Avon and Birmingham.

4.187 The Borough is also surrounded by high capacity trunk roads. The M40 and M4 are close to the southern flank of the Borough whilst the M1, A1 and A41 are located close to the north-east corner of the Borough. The M25 provides the major orbital route to the north and west while the A406 North Circular Road is to the southeast.

4.188 The Borough is served by a network of local and cross-Borough bus routes operated by private companies and regulated by Transport for London. In terms of capacity, the Council's Local Transport Plan notes that there is spare capacity outside peak hours but not during peak times. It also observes that there are areas of the Borough which do not fall within the Transport for London criteria for bus service provision and consequently are not served by London buses.

Car Ownership and Development

4.189 At the 2001 census over 70% of households in Harrow owned cars and two thirds of the Borough's households were recorded as having two or more cars. Car ownership levels in Harrow are higher than the national average and the third highest level in London.

4.190 Road accident rates rose slightly from the last monitoring period. There were a total of 428 recorded accidents including two fatalities in Harrow in 2010/11. Although, the Government has removed national road safety targets, the borough has set its own targets for the three year average for 2012-2014.

4.191 96% of schools in Harrow had School Travel Plans as at 31 March 2011 and 78% of these updated their plans during 2010/11. Two of the schools have achieved silver accreditation which means they have attained higher than average standards.

Access to Opportunities and Services

4.192 As previous years, no new residential development was located more than 30 minutes' travel time to public transport in the Borough during 2010/11. Similarly all major new residential development has been within 30 minutes' public transport time (or less) of a GP, hospital, primary school, secondary school, areas of employment and a major health centre.

Health

Objective 14 of the SA Scoping Report seeks to improve the health and wellbeing of Harrow's residents and reduce inequalities in health

Life Expectancy

4.193 Harrow has an overall life expectancy at birth of 79 years for men and 83.1 for women. These latest figures from the Harrow Vitality Profiles 2010 are also still well above the average for London, men by 1.9 and women by 1.4 years. They are also above the 1999-2003 average by 1 and 0.4 years for men and women respectively.

Health and Disability Deprivation in Harrow

4.194 Health and disability deprivation is based on a basket of indicators comprising: figures for years of potential life lost, comparative illness and disability ratio, emergency admissions to hospital, mood and anxiety disorders, hospital episode, suicides and health benefits. In Harrow overall health and disability deprivation is well below average compared both to London and England as a whole.

4.195 Just one area within Roxbourne ward is within England's most health and disability deprived.

4.196 There is no baseline information available on health and disability deprivation among different population groups within the Borough. However Harrow Health Profile (2007) compares the proportion of people from different ethnic backgrounds in Harrow in routine and manual occupations (based on 2001 Census data) and observes that people in these occupations have poorer health than those in professional occupations, are more likely to be smokers and suffer a higher infant death rate.

Vulnerable Groups

4.197 The West London Cross Authority Strategy Statement, citing work carried out by Mori in 2001, suggests that between 3.1% and 3.6% of Harrow's population comprises refugees; it goes on to report that refugees in West London have difficulties accessing the health service because of language barriers and not understanding the NHS.

4.198 In Harrow there is only one traveller site with 8 caravan pitches. The Strategy Statement reports the findings of a survey in relation to travellers support needs; issues highlighted include poor access to health and dental care, low levels of adult literacy, lack of appropriate employment opportunities, community conflict resolution and access to social housing.

4.199 Other vulnerable groups identified by the West London Cross Authority Strategy Statement include ex-offenders (needing housing and mental health services upon return to Boroughs from prison), single homeless people (needing housing and support services), women escaping domestic violence (needing emergency refuge accommodation, support for women with children and counselling services), drug and alcohol mis-users (linked to mental health and ex-offenders' needs) and young people at risk (needing accommodation services).

Lifestyle and Poor Health

4.200 Harrow PCT's Public Health Annual Report Data Supplement 2008 states that, in 2001, 280 deaths in Harrow were attributed to smoking related illness, equivalent to 17% of all deaths in Harrow that year. However on a more positive note a total of 2042 persons in Harrow during 2007/08 had set a quit date and of these 62% were recorded as having successfully quit after 4 weeks. The quit rate per 100,000 population aged over 16 years was 721, higher than the rates for north-west London and London as a whole, but below average for England. The PCT Report

goes on to point out that quit-smoking services have targeted the Borough's most deprived wards – of Roxbourne, Greenhill and Wealdstone – and consequently in these areas quit rates per 100,000 population were highest.

4.201 There is no detailed information on levels of obesity relevant to Harrow. However the PCT Report cites the Health Survey for England (1994-2002) as indicating that levels of obesity have increased over time and that rates of obesity are higher in north west London.

4.202 According to Harrow Health Profile 2007 (APHO and Department of Health) diabetes affects 11,248 people in Harrow which, as a percentage of the Borough's population, is higher than the average rate for England. However the percentage of people claiming sickness benefit because of mental health problems is reported as being lower in the Borough than the England average. It is also reported that 1 in 3 Harrow adults eats healthily compared to 1 in 4 in England as a whole. There were 742 incidents of drug misuse reported and 274 hospital stays due to alcohol in Harrow during 2007.

4.203 When surveyed 11% of adults in Harrow reported that they participate in the recommended level of physical activity (3 x 30 minutes per week) and 47% indicated satisfaction with sports and leisure facilities and events.

Town Centre Vitality & Viability

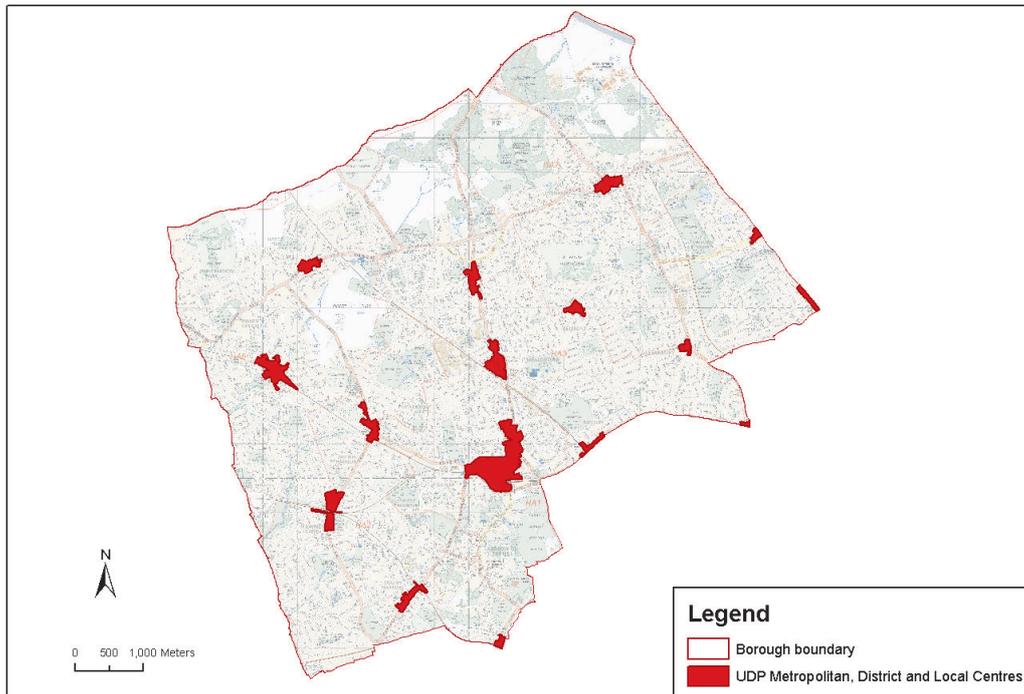
Objective 15 of the SA Scoping Report seeks to improve the competitiveness, vitality, viability and adaptability of town centres in Harrow

4.204 There was no new major retail, office or leisure development completed in Harrow's centres during the 2010/11 nor in the previous year. Consequently there has been no change in the proportion of office space in Harrow town centre, which represents 34% of the Borough's total stock.

4.205 Harrow town centre has a range of facilities and services which include a central lending library, a bingo hall, two cinemas, and three gymnasiums. However the town centre ranks 9th out of twelve London Metropolitan centres in terms of comparison goods retail floorspace and has only one department store.

4.206 Some district centres are also served by local lending libraries. Map 4.10 (below) shows Harrow's town, district and local centres is shown below.

Map 4.10 Harrow Town Centres



Harrow Town Centre: Vitality and Viability

4.207 Comparison units account for the largest proportion of retail units in Harrow town centre (39.6%), although this is slightly below the national average (44.0%). Convenience retailers (8.5 %) represent a slightly lower proportion compared to the national average (9.5%). The proportion of A1 services in Harrow town centre (10.8%) is exactly the same as the national average. A3 and A5 services is slightly above the national average (accounting for 15.2% of units compared to a national average of 14.8%), with the proportion of A2 services (17.7%) almost double the national average proportion (9.5%). In terms of vacant premises, information compiled by Goad demonstrates that the proportion of vacant units in Harrow town centre (5.7%) is significantly below the national average (11.4%).

4.208 The analysis of the shopping hierarchy in Section 4 also confirms that Harrow’s shopping offer is below that of other Metropolitan Centres, and the quality of national multiples is relatively poor. The household survey results suggest the centre has a relatively small catchment area for a designated Metropolitan Centre.

4.209 Harrow town centre is highly accessible by public transport, served by Harrow-on-the-Hill station and the Harrow’s central bus station; consequently there are links to/from central London and surrounding boroughs, as well as links with other parts of Harrow. By car the town centre is accessible from the A404 (Pinner Road), the A312 (Bessborough Road) and the A409 (Station Road) and is served by 10 general public car parks.

4.210 An environmental assessment conducted as part of the Retail Study (2009) found that Harrow town centre’s principal (pedestrianised) road, St. Ann’s Road, was good, but that shopfronts were in need of some improvement.

4.211 The Council carries out its own pedestrian count surveys in Harrow town centre (and some other centres). The last pedestrian count in Harrow town centre took place in the 2010/11 period and revealed that footfall was 4.4% down from the 1999/00 baseline.

Harrow Town Centre: Need for Development

4.212 Harrow town centre provides an important role for comparison shopping. It has a high proportion of 'clothing and footwear' units when compared with other centres in the Borough. However the consultant Nathaniel Lichfield & Partners, commissioned to undertake the Harrow Retail Study (2009), indicated that within a Metropolitan centre there would have been a better range and choice of clothing and footwear shops. The current focus is on middle and discount sectors of the market rather than the upper and quality end of the market. The quality of fashion shopping could be significantly improved in the town centre. It also has a large amount of convenience retail floorspace, providing for both grocery shopping and top up shopping needs. The centre has low vacancy rate and a reasonable proportion of national multiple retailers. However as a Metropolitan centre the quality of the comparison shopping offer and evening economy could be improved.

Other Borough Centres

4.213 Aside from Harrow town centre the Borough is served by Edgware Major Centre and nine district centres (Kenton, Wealdstone, South Harrow, Rayners Lane, North Harrow, Pinner, Stanmore, , Burnt Oak & Kingsbury) and five local centres (Sudbury Hill, Hatch End, Harrow Weald, Belmont & Queensbury). A map of the location of these centres is shown above.

4.214 The Council maintains records of the levels of vacancy within the Borough's district and local centres. The Council maintains records of the level of vacancy within the Borough's district and local centres; the previous five monitoring periods are 2005/06, 2006/07 2007/08, 2008/09 and 2009/10. The highest vacancy rate in the previous three monitoring periods – 14.7% - was in North Harrow. Sudbury Hill and Edgware Centres both had sharp increases in vacancy rates but it should be noted that both of these centres are relatively small (33 and 46 units respectively).

4.215 The Retail Study (2009), in forecasting potential growth in available expenditure and assuming that Harrow will maintain its market share, has projected a need for 4,379m² (net) additional convenience goods floorspace by and 24,000m² (net) additional comparison floorspace by 2020.

4.216 There are existing food supermarkets of various sizes integrated into the centres of Harrow (Iceland and M & S food hall), Wealdstone (Iceland, Tesco Express, Sainsbury's Local and Budgen), Pinner (M & S food hall and Sainsbury's), Stanmore (Sainsbury's), Harrow Weald (Waitrose and Iceland), South Harrow (Sainsbury's) and Rayners Lane (Tesco Express and Sainsbury's Local). There are also supermarkets at edge of centre supermarkets at Hatch End (Morrisons), Queensury (Morrisons) and South Harrow (Waitrose). There is an out of centre supermarket (Tesco) at Pinner Green.

4.217 Planning permission has also been granted for a Morrisons store on Pinner Road on the edge of Harrow town centre and this is now under construction. In addition the Council has resolved to grant outline planning permission for the redevelopment of the former Kodak site in Wealdstone and the scheme includes a new food supermarket.

Crime

Objective 16 of the Scoping Report SA seeks to reduce crime, the fear of crime and anti-social activity

Crime

4.218 There was a 3% decrease in recorded crime in Harrow in 2010/11, with falls in many of the major crime categories, although there were increases in residential burglary, vehicle theft and grievous bodily harm. Harrow remains one of the safest London Boroughs with the fourth lowest level of crime, as measured by crime per 1,000 population.

4.219 In Harrow town centre a Safer Neighbourhood team is now in place together with a scheme to help retailers combat crime.

Fear & Perceptions of Crime

4.220 During 2008 a Residents' Survey was carried out by Ipsos MORI for Harrow Council. The Survey included questions about crime and the fear of crime.

4.221 Residents were asked whether they thought the level of crime had increased, decreased or stayed the same; 50% of respondents said that they thought crime had increased whilst only 10% thought that crime had decreased. This represents improvements on previous years – the proportion of respondents that thought that the level crime had increased was 57% in 2006 and 62% in 2005, whilst the proportion of those saying perceiving a decrease was 9% in 2006 and 8% in 2005.

4.222 Residents were asked a similar question but relating specifically to crime levels in their local area, defined as the area within a 15 minute walk from their home. In 2008 42% of respondents thought there was a low level crime in their local area and a further 41% believed there to be a medium level of crime, compared to 38% and 39% respectively in 2006. Those perceiving a high level of crime in their local area fell from 9% in 2006 to 7% in 2008.

4.223 Feelings of personal safety and fear of crime are slightly increased. When asked how safe they feel, 61% of respondents said they felt safe in the area where they live and when alone at home after dark (down from 71% in 2007); and 61% of respondents said they felt unsafe walking alone in the area where they live after dark (up from 60% in 2006). When asked how fear of crime was affecting their quality of life, on a scale of 1 to 10 where 1 is no effect and 10 is total effect of quality of life, the mean score for all respondents in 2008 was 4.95, up from 4.97 in 2006.

4.224 Typically respondents aged between 35 and 64 and those that have lived in the Borough for six or more years were more likely to perceive an increase in crime. Similarly older residents (55 to 64) were more likely to regard crime in their local area as being high and also, for this group, fear of crime has increased. A further dimension of perceptions and fear of crime is revealed from a geographical analysis of the results: those living in central Harrow were more likely to think that crime in their local area was high whilst those living in Pinner and Headstone were more likely to regard crime levels in their local area as being low; residents of West Harrow, Harrow-on-the-Hill and Pinner felt particularly safe in their community and additionally, in Pinner, the lowest impact of fear of crime on quality of life. By contrast residents in East Harrow were more likely to respond that fear of crime had a high impact on their quality of life.

Anti-Social Behaviour

4.225 As part of the 2008 Survey residents were also asked about anti-social behaviour. Residents were asked about a range of forms of anti social behaviour in their local area, leading to the following results:

Table 2: Results from Harrow Residents' Survey 2008 (Crime & Anti-Social Behaviour)

	% Not a Problem	% Problem
Rubbish and litter lying around	41	59
People not taking responsibility for the behaviour of their children	52	48
Vandalism, graffiti and other deliberate damage to property or vehicles	46	57
Teenagers hanging around on the streets	53	47
People using or dealing drugs	56	44
People not treating other people with respect and consideration	57	43
People being drunk or rowdy in public places	55	45
People being attacked because of their skin colour, ethnic origin or religion	78	24
Noisy neighbours or loud parties	81	19
Abandoned or burnt out cars	81	19
People sleeping rough on the streets or in other public places	83	16

4.226 Residents of central Harrow (59%) and East Harrow (47%) were more likely to report a problem with vandalism, graffiti and other deliberate damage. Central Harrow returned slightly higher than average concerns about racial attack (27%) and drunkenness (57%) .

4.227 Finally, residents were asked about their experience of anti-social behaviour; specifically, whether they had personal experience of problems with neighbours or in their local area within the past 12 months. This question generated the following results:

- 42% had experience of teenagers hanging around
- 44% of littering/fly tipping
- 26% of noise nuisance
- 28% of criminal damage/vandalism
- 25% of people being drunk or rowdy
- 20% animal related nuisance
- 15% intimidating or threatening behaviour
- 15% drug dealing/using
- 13% abandoned cars
- 10% burglary
- 10% robbery in the street
- 5% physical assault
- 4% harassment or physical attack because of skin colour, ethnic origin or religion
- 2% people sleeping rough

4.228 Respondents in central Harrow were more likely to say they had experienced at least one of these forms of anti-social behaviour.

4.229 During 2006/07 the Council created a dedicated enforcement team to reduce fly tipping, graffiti, litter and wider environmental crime. In addition a 'Community Payback' scheme has been implemented to deal with environmental blight.

SUSTAINABILITY ISSUES - Summary

4.230 Drawing from the above issues-based characterisation and the general list of sustainability issues contained in Chapter 6 of the 2006 Scoping Report, it is considered that the three DPDs policies will need to address the following:

Land Use

4.231 The baseline shows that all new development is occurring on previously-developed (brownfield) land, and that there are no major land contamination issues in the Borough. Although residential densities are showing an improving trend there is scope for further improvement in areas of good public transport accessibility, and there has been little/no development for other (non residential) uses in town centres in recent years. The current baseline situation is therefore considered to be unfavourable as a highly efficient use of land in terms of density and uses is not being achieved.

4.232 In the light of projections indicating household and population growth in Harrow the policies will need to continue to achieve improvements in the efficient use of the Borough's finite land resource. This will mean the delivery of forms and densities of development, where context allows, different to those which have been hitherto achieved if the best of the Borough's existing built environment and its open spaces are to be effectively protected during the plan period and beyond.

Open Space

4.233 The Borough is well served by open space in general, but the provision and distribution of different typologies of open space are variable and there are also some issues concerning quality and accessibility. A central spine of deficiency in access to open space represents a particular challenge. The current baseline situation is therefore considered to be uncertain.

4.234 The DPDs will need to ensure that the open space needs of the growing population are met by locating development in relation to the existing distribution of space, providing new forms of open space where this is needed to serve new development, or upgrading existing open space (including access to) to meet the need of the future population - or a combination of all three. It will also be necessary to ensure that the quantity, range and quality of facilities meets the need of the future population.

Biodiversity

4.235 The Borough's biodiversity is documented in the Harrow Biodiversity Action Plan and Sites of Nature Conservation Importance are mapped and graded. The Biodiversity Action Plan also sets out a series of actions for the on-going protection and enhancement of biodiversity (including the protection of gardens from development). The current baseline situation is therefore considered to be favourable.

4.236 The habitats and species the subject of statutory protection are predominantly situated in locations that will be safeguarded from development by other plans and strategies; the principal consideration for the DPDs in relation to these will therefore be the implications of any increased recreational pressure, the role of residential gardens and (indirectly) the mitigation of pollution and climate change. One exception to this is bats, a protected species which is prone to loss of roosting sites and disturbance to commuting routes as a result of development (although it may be noted that Bats benefit from statutory protection measures that need not be replicated/amplified in planning policies). However the DPDs will also need to reconcile development with the protection of other locally important habitats, e.g. direct losses of bare soil habitats on development sites, increased recreational pressure in parks and other open spaces, etc.

Historic Environment

4.237 A number of Harrow's designated heritage assets are on the London Heritage at Risk Register (2011) and views of Harrow Hill are particularly sensitive to development in Harrow town centre. In terms of non-designated assets, many of Harrow's residential areas are good examples of 'Metroland' suburbs but are prone to insensitive alterations and redevelopment. Overall, however, Harrow's heritage assets are suitably identified and protected, and the Council is progressing a programme of work to secure complete coverage of the Borough's conservation areas with supplementary planning documents, character appraisals and management strategies. The current baseline is, on balance, considered to be favourable.

4.238 . The DPDs policies will need to deliver development which reconciles the need for development with the protection of these valuable, irreplaceable assets and secure appropriate investment and public access opportunities. They will also need to manage the sensitive relationship between Harrow town centre and Harrow on the Hill, and ensure that growth is compatible with non-designated heritage assets such as the 1930s suburbs.

Natural Resource Use

4.239 Using waste generation as a measure of natural resource use, it is apparent that consumption is increasing. The current baseline situation is therefore considered to be unfavourable.

4.240 In the light of projections indicating household and population growth, the DPDs will need to secure development that secures more sustainable consumption of resources and contribute to increased recycling and composting rates from households and businesses.

Water Quality and Flooding

4.241 Although there is no evidence specific to Harrow about water use there is nothing to suggest that consumption in Harrow is significantly below the average and, indeed, information from the regional water supplier indicates that demand for water may be above the national average. There are also a number of areas in the Borough susceptible to surface water flooding including Wealdstone which forms a part of the Intensification Area for significant housing and employment growth. The current baseline situation is therefore considered to be unfavourable.

4.242 In light of projections indicating significant household and population growth the DPDs policies will need to contribute to an overall reduction in per-person water consumption and will need to ensure that development is both compatible with flood risk (in accordance with national

sequential principles), is safe and contributes to flood risk reduction. This will be particularly relevant to Wealdstone which is highly urbanised and where improved surface water run off rates/overall flood risk reduction can only be achieved through redevelopment and investment.

Sustainable Energy Use

4.243 There is no evidence specific to Harrow about the extent of energy consumption, but it has been possible, from general sources about the efficiency of the UK dwelling stock by age and type, to conclude that the Borough's stock of predominantly 'Metroland' houses from the 1920s and 30s are unlikely to perform well. The current baseline situation is therefore considered to be uncertain/unfavourable.

4.244 However it can also be concluded that the predominant form of development in the Borough in recent years - flats in purpose built blocks - will be achieving considerable efficiencies. In the light of projections indicating significant household and population growth the DPDs will need to continue to achieve energy-use efficiency savings both in terms of building fabric but also through sustainable patterns of land use.

Waste

4.245 Harrow has achieved considerable success in recent years in shifting the balance of waste treatment in favour of recycling and composting, largely through improvements in the arrangements for the separation and collection of waste from households. For this reason the current baseline situation is therefore considered to be favourable.

4.246 However, overall, the amount of waste generated continues to rise and non-recyclable/non-compostable waste continues to be transported to landfill beyond the Borough. In the light of projections indicating significant household and population growth the DPDs will need to contribute to the reduction in the amount of waste generated and encourage re-use, recycling and composting at source.

Economy

4.247 Harrow's indigenous economy comprises a small number of major local employers and a substantial number of small and medium sized enterprises, with a strong entrepreneurial culture contributing to high levels of business formation. The Borough's residents are predominantly employed in service and related sectors and, as might be expected, there are high levels of out-commuting to west and central London. However there are localised issues of unemployment and deprivation, particularly in and around Wealdstone, and the future of some large employers and the public sector as a major source of employment in the Borough is uncertain. Therefore the current baseline situation is considered to be unfavourable.

4.248 The DPDs will need to safeguard the capacity of the Borough to continue to support local business formation and growth, and ensure that the population continues to benefit from employment opportunities elsewhere in London.

Education and Skills

4.249 The Borough is well served by state funded, voluntary aided and independent schools and overall educational achievement exceeds the national average. The working-age population is also generally well educated although there are pockets within the Borough of more limited workforce skills particularly in and around Wealdstone. Overall however the current baseline situation is therefore considered to be favourable.

4.250 The DPDs will need to ensure that the educational needs of the growing population are met by locating development in relation to the existing schools, providing new schools where needed to serve new development, or upgrading existing schools (e.g. to increase capacity) to meet the need of the future population - or a combination of all three.

Housing

4.251 Until the 2007/08 period, when there was a slight shortfall, the number of dwellings completed in Harrow has kept up with (and exceeded) the Borough's London Plan target figure of 350 homes per year. However homelessness and affordability remain significant issues for residents and therefore the current baseline situation is considered to be unfavourable.

4.252 The DPDs will need to ensure that housing supply recovers and continues to meet London Plan and Core Strategy targets, and that an adequate supply of decent and affordable housing, with an appropriate mix of units, can be delivered in time to meet the requirements of the Borough's projected household and population growth.

Social Exclusion and Community Cohesion

4.253 The Borough is well served by public transport infrastructure and in recent years all of the Borough's residential development has been located as to secure reasonable (within 30 minute) access by public transport to services and facilities such as GPs, schools, employment etc. However levels of car ownership in Harrow are high and car parking continues to be included in most developments. Overall the current baseline situation is considered to be favourable.

4.254 In the light of projections indicating significant household and population growth the DPDs will need to promote patterns of development which discourage car use and ensure that community infrastructure is delivered to meet the needs of new residents but also benefits existing communities.

Health

4.255 The population of Harrow is on the whole comparatively healthy although there is scope to improve the proportion of adults in the Borough participating in the recommended level of weekly physical activity, to improve smoking quit rates and help to stem growing obesity in north west London as a whole. One super output area within one of Harrow's wards is amongst England's most health and disability deprived. Overall the current baseline situation is considered to be favourable.

4.256 The DPDs will need to secure patterns of development which tackle these issues and secure health infrastructure to meet the additional demand created by population growth.

Town Centres

4.257 Harrow town centre is a strong retail centre with good multiple-retailer representation but constrained by unit size and a limited market due to a low-quality offer; however Harrow is surrounded by strong competitor centres and has seen rising vacancy levels in recent years. There is a need for additional comparison shopping floorspace in Harrow town centre and for additional supermarket provision in the Borough including one in/around the town centre. There is limited information about the health of the Borough's district and local centres. The current baseline situation is considered to be unfavourable/uncertain.

4.258 The DPDs will need to make provision for development needed to reinvigorate Harrow town centre and secure its long term future as one of London's Metropolitan centres; it will also need to safeguard the role of district and local centres and promote an appropriate evening economy.

Crime

4.259 Taken as a whole Harrow continues to be a comparatively low crime area, and has the lowest crime rate per 1,000 population of any London Borough. In recent years rates of crime within the Borough have been highest within central wards of the town centres. Perceptions and fear of crime remain high but are generally following a falling trend. Residents continue to express concerns about anti-social behaviour. Overall however the current baseline situation is considered to be favourable.

4.260 The DPDs will need to secure forms of development which contribute to crime reduction, design out crime and ensure that the benefits of development - access to jobs, services and other infrastructure - are spread to those areas where crime and the effects of crime are highest.

Appraisal of Development Management Policies DPD

Background to the Development Management Policies Development Plan Document

5.1 The Development Management Policies DPD will form one of Harrow's development plan documents and gives effect to the Core Strategy by detailing development requirements and constraints that will contribute to the delivery of Harrow's spatial strategy. Upon adoption, the DPD will supersede the extant policies of the Harrow Unitary Development Plan (2004). The London Plan (2011) also forms a part of the development plan for Harrow and includes planning decisions policies which apply directly to relevant development proposals. It has not therefore necessary to duplicate matters addressed by planning decisions policies in the London Plan in Harrow's Development Management Policies DPD.

5.2 The preparation of Harrow's Core Strategy (2012) was informed by its own sustainability appraisal. The sustainability appraisal helped to shape the spatial strategy and policies of the Core Strategy which form the context for the Development Management Policies DPD. This sustainability assessment of the Development Management Policies DPD does not therefore seek to revisit the appraisal of the Core Strategy, but instead focuses on the performance of the Development Management Policies DPD against the 16 sustainability objectives established in Harrow's Sustainability Appraisal Scoping Report (2006).

Sustainability Appraisal of the Development Management Policies Development Plan Document

5.3 A high level approach to the appraisal of the Development Management Policies DPD has been adopted. It focuses on the principal themes into which the individual policies are arranged - protecting Harrow's character and residential amenity; conservation and heritage; environmental sustainability; open space and the natural environment; housing; employment and economic development; town centres and neighbourhood parades; transport and waste; community infrastructure; telecommunications; and implementation, resources and monitoring - and how these perform against Harrow's sustainability objectives. The assessment has been carried out by Council officers and the following scoring symbols is used in the tables below to identify positive and/or negative effects.

Key to Symbols Used in the Appraisal

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Appraisal of the Development Management Policies DPD

CHARACTER AND AMENITY

Policy 1

Achieving a High Standard of Development

Design and Layout Considerations

- A. All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- B. The assessment of the design and layout of proposals will have regard to:
 - a. the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;
 - b. the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and external services;
 - c. the context provided by neighbouring buildings and the local character and pattern of development;
 - d. the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;
 - e. the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;
 - f. the functionality of the development including but not limited to internal circulation, parking, servicing and arrangements for waste, recycling and composting; and
 - g. the arrangements for safe, sustainable and inclusive access and movement to and within the site.

Privacy and Amenity Considerations

- C. All development and change of use proposals must achieve a high standard of privacy and amenity. Proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of development, will be resisted.
- D. The assessment of privacy and amenity considerations will have regard to:
 - a. the prevailing character of privacy and amenity in the area and the need to make effective use of land;
 - b. the overlooking relationship between windows and outdoor spaces;
 - c. the relationship between buildings and site boundaries;
 - d. the visual impact of development when viewed from within buildings and outdoor spaces;
 - e. the adequacy of light and outlook within buildings and outdoor spaces;
 - f. the adequacy of the internal layout of buildings in relation to the needs of future occupiers and any impact on neighbouring occupiers;
 - g. the impact of proposed use and activity upon noise, including hours of operation, vibration, dust, air quality and light pollution; and
 - h. the need to provide a satisfactory quantum and form of amenity space for future occupiers of residential development.

Other Planning Considerations

- E. Development which would prejudice the future development of other parts of the site, adjoining land, or which would frustrate the delivery of adopted plans and allocated sites, will be resisted.

Policy 2

Achieving Lifetime Neighbourhoods

- A. The location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of lifetime neighbourhoods. In particular:
 - a. non-residential development and change of use proposals must be appropriately located to sustain town centres, neighbourhood parades and local employment opportunities;
 - b. non-residential development and change of use proposals must be accessible to all;
 - c. new residential development and conversion proposals **must ensure good access to services and facilities, and** provide accessible homes in accordance with Policy CS1 of the Core Strategy; and
 - d. all proposals must be safe and secure for everyone.
- B. Major proposals will be expected to demonstrate how they contribute to the creation of lifetime neighbourhoods within and beyond the site boundary.
- C. Improvements to the public realm must achieve an inclusive, legible pedestrian and cycling environment. Where opportunities exist, pedestrian and cycle routes between suburban areas, town centres, neighbourhood parades, public transport and green infrastructure should be strengthened. Proposals which impede pedestrian and cyclist permeability will be resisted.
- D. New and replacement bus stops must be of accessible design. All proposals must make appropriate provision for car parking for disabled people.
- E. Major development within town centres and proposals for public buildings, visitor attractions and tourist accommodation, and Green Grid projects, should make appropriate provision for the comfort and convenience of all users, including those with special mobility requirements.
- F. Sensitive adaptations of heritage assets which contribute to the creation of lifetime neighbourhoods will be supported.

Policy 3

Protected Views and Vistas

- A. The protected views identified in Schedule 4 will be safeguarded in accordance with the Harrow Views Assessment (2012) and the London Views Management Framework.
- B. Where there is a protected view:
 - a. development should not exceed the threshold height of a landmark viewing corridor (shown in red); and
 - b. development in the wider setting consultation area (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark.
- C. Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate important landmarks, in particular St. Mary's Church and Harrow on the Hill, and the Harrow Weald Ridge as seen from designated viewing places.
- D. Development in the foreground and middle ground of a protected view should not be overly intrusive or unsightly to the detriment of the view, or detract from the prominence of the landmark.
- E. Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole.
- F. Viewing places should be accessible and managed so that they enhance people's experience of the view.
- G. Opportunities to create new local views and vistas should be exploited through the design and layout of new development.

Policy 4

Shopfronts and Signs

- A. Proposals for shopfronts and signs will be approved where:
 - a. they are in scale and proportion to the host building and appropriate to the character of the area in which it is located;
 - b. they do not adversely affect pedestrian or highway safety;
 - c. they would preserve or enhance heritage assets having regard to the design and materials of shopfronts, including any traditional or original features that should be retained, and the number, siting and illumination of signs;
 - d. the shopfront would secure inclusive access;
 - e. the illumination of signs and shopfronts would not detrimentally affect the amenity of neighbouring occupiers or the character or appearance of a conservation area; and
 - f. where the proposal involves the installation of a new or replacement shopfront, the use of toughened glass will be required.
- B. Security shutters should be of an open mesh design and, wherever possible, should be located internally.

Policy 5

Advertisements

- A. Proposals for advertisements on buildings and freestanding units will be approved where:
 - a. they do not adversely affect the visual amenity of the area, having regard to the character and use of the area;
 - b. they do not adversely affect the amenity of residential occupiers by reason of siting, illumination or noise;
 - c. they are appropriate in scale and illumination to the location and, in the case of advertisements on buildings, the host building;
 - d. they contribute to the creation of lifetime neighbourhoods by rationalising street clutter and help to achieve an inclusive, legible environment;
 - e. they contribute to the safety of the environment for pedestrians, cyclists and drivers;
 - f. they do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security; and
 - g. they do not adversely affect the amenity of any residential or sensitive area.
- B. Advertisement hoardings will be appropriate in non-residential areas where they screen vacant or derelict sites, or sites where development is imminent.
- C. Proposals for advertisement resulting in a cluster of hoardings will be resisted where there would be a cumulative impact upon amenity.
- D. Proposals for advertisements that advertise temporary events and markets in centres will be supported.

Policy 6

Areas of Special Character

- A. Proposals affecting an area of special character will be considered having regard to:
 - a. the impact of the proposal upon the strategic value of the area of special character;
 - b. the desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character;
 - c. the protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

SUSTAINABILITY OBJECTIVE	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6
S01 To make the most efficient use of land and buildings	++	+	0	0	0	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	0	0	0	+
S03 To conserve and enhance biodiversity in the Borough	++	+	0	0	0	+
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++	+	+	++	++	++
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	0	0	0	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	+	0	0	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	+	0	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	++	0	0	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	+	0	0	0	+
S11 To improve the education and skills of the Borough	0	+	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	++	++	0	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	++	0	0	0	0
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	++	++	0	0	0	+

SUSTAINABILITY OBJECTIVE	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	++	0	+	+	0
S16 To reduce crime, fear of crime and anti-social activity	++	++	0	++	++	0

5.4 The policies within this chapter score particularly well in ensuring that proposals are controlled in a manner where they would not result in a negative effect on the landscape and streetscape of the area. Policy 1 is considered to meet the majority of the sustainability objectives as it covers a variety of design considerations that would need to be accounted for in most proposals for development. Policy 2 scores particularly well on social objectives by ensuring that all developments including housing are accessible and in the case of housing can be used throughout a person's life with minimal adaptation. Policy 3 responds positively to sustainability objective 5 by providing a framework for managing impacts on protected views of local historic/culturally important features. Shopfronts and advertisements provide positives to town centres and crime through improving the appearance of an area that may lead to less anti-social activity. It is also considered that the policies promote opportunities for the sustainable use of energy in proposals generally, which could be achieved in the design of proposals.

5.5 The proposed minor modification (**shown in bold and underline text**) to Policy 2 would further strengthen the policy's performance in relation to sustainability objective 13, which already scores as a significant positive effect, by ensuring that future occupiers have good access to services and facilities. All other proposed modifications to this chapter involve further clarification/amplification of the reasoned justification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

CONSERVATION AND HERITAGE

Policy 7

Heritage Assets

- A. When assessing proposals affecting heritage assets, priority will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. Proposals that secure the preservation, conservation or enhancement of a heritage asset and its setting, or which secure opportunities for sustainable enjoyment of the historic environment, will be approved. Proposals that would harm, or lead to the loss of, the significance of heritage assets will be refused.
- B. Applications for proposals affecting heritage assets will be required to:
- demonstrate an understanding of the heritage asset including its significance and the contribution of their setting to that significance;
 - explain how the significance of the heritage asset has informed the proposal; and
 - show at an appropriate level of detail on the drawings, or in other material, how the proposal relates to the heritage assets affected.
- Where relevant, the application should also explain how any harm to or loss of heritage assets or ~~its~~**their** setting is considered to be justified, including the consideration to alternative schemes.
- C. The impact of proposals affecting heritage assets will be assessed having regard to:
- emerging or adopted supplementary planning documents, including character appraisals and management plans or other relevant documents;
 - relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;
 - the preference to be afforded to proposals that both conserve and sustain heritage assets and their setting;
 - any sustainable economic benefits;
 - the need to mitigate climate change and to ensure that heritage assets are resilient to the effects of climate change; and
 - the desirability of increasing understanding, interpretation and public access of heritage assets.
- D. The Council will use planning conditions and planning obligations where necessary to ensure the preservation, conservation or enhancement of heritage assets and their setting, and to secure the exploitation of opportunities for the sustainable enjoyment and increased understanding of the historic environment.

Policy 8

Enabling Development

- A. Whether the benefits of enabling development to secure the future conservation of a heritage asset outweigh the disbenefits of that development, proposals will be assessed having regard to:
 - a. the significance of the heritage assets affected and the contribution of their setting to that significance;
 - b. the impacts upon the heritage assets and their setting; and
 - c. the long term future of the heritage assets affected.
- B. Enabling development will only be approved where:
 - a. it is the only viable means of securing the long term future of the heritage assets affected; and
 - b. the enabling development is the minimum necessary to secure the long term future of the heritage assets affected.

Policy 9

Conservation Areas

- A. When assessing proposals affecting conservation areas substantial weight will be given to the preservation or enhancement of the character or appearance of the areas.
- B. The Council will preserve the character or appearance of conservation areas and their setting by:
 - a. resisting the loss of buildings, views or other features that make a positive contribution to the character or appearance of the conservation area;
 - b. resisting alterations, extensions and new development that would be detrimental to the character or appearance of the conservation area; and
 - c. resisting the introduction of uses that would be detrimental to the character or appearance of the area.
- C. The Council will seek to enhance the character or appearance of conservation areas by:
 - a. supporting the redevelopment of sites that detract from the character or appearance of the conservation area;
 - b. supporting alterations, extensions and new development that would enhance the character and appearance of the conservation area;
 - c. exploiting opportunities to restore lost features or introduce new ones that would enhance the character and appearance of the conservation area; and
 - d. securing the implementation of improvement actions set out in relevant conservation area supplementary planning documents, character appraisals and management strategies.

Policy 10

Listed Buildings

- A. When assessing proposals for works to, or otherwise affecting, a statutory listed building substantial weight will be given to the preservation of the building or its setting including any features of special architectural or historic interest which it possesses.
- B. The Council will preserve listed buildings and their setting by:
 - a. only permitting substantial harm to, or loss of, grade II listed buildings in exceptional circumstances;
 - b. only permitting substantial harm to, or loss of, grade I or grade II* listed buildings in wholly exceptional circumstances;
 - c. resisting proposals that would harm the character or features of special architectural or historic interest of a listed building, or compromise the building's setting; and
 - d. supporting proposals that would secure the preservation of the building, its character and any features of special architectural or historic interest which it possesses, or enhance the building's setting.

Policy 11

Locally Listed Buildings

- A. When assessing proposals affecting locally listed buildings, including those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving or enhancing their local architectural or historic significance. ~~On sites where a locally listed building has been speculatively demolished in advance of a redevelopment proposal, and the retention of the building is justified, the Council will require the reconstruction of the building.~~

Policy 12

Scheduled Ancient Monuments

- A. Proposals affecting a scheduled ancient monument will be considered having regard to:
 - a. the presumption against substantial harm to or loss of scheduled ancient monuments;
 - b. the relationship of the monument with other archeology and the wider landscape in which it should be interpreted;
 - c. the condition and management of the monument;
 - d. the existing and future security of the monument; and
 - e. the desirability of increasing understanding, interpretation and public access.
- B. The Council will support suitable proposals that secure the conservation of scheduled ancient monuments and enhance their setting. Major development and change of use proposals affecting a scheduled ancient monument will be required to provide and implement an action plan for the management of the monument.
- C. Proposals that would prejudice the fabric or setting of a scheduled ancient monument, or which do not provide satisfactory information about the implications of the proposal upon a scheduled ancient monument, will be refused.

Policy 13

Archaeology

- A. Proposals affecting an archaeological priority area or any other non-designated archaeological remain will be considered having regard to:
 - a. the known or anticipated significance of the archaeology;
 - b. the likely implications of the proposal upon the archaeology; and
 - c. the need to preserve the archaeology *in situ*; or
 - d. the adequacy of arrangements for the investigation, recording, archiving and (where appropriate) curation of archaeology not requiring preservation *in situ*.
- B. Proposals that would lead to the destruction of important archaeological remains, or which do not provide satisfactory information about the implications of the proposal upon known or anticipated archaeology, will be refused.

Policy 14

Nationally Registered Historic Parks and Gardens

- A. Proposals affecting a registered historic park and garden will be considered having regard to:
- the strong presumption against harm to or loss of registered historic parks and gardens;
 - the great weight to be placed on the desirability of preserving or enhancing the special historic interest of registered parks and gardens; and
 - the contribution of the wider setting of the registered park and garden to its significance.
- B. The Council will support suitable proposals that secure the conservation of registered historic parks and gardens and enhance their setting.
- C. Proposals that would prejudice the special historic interest of a registered historic park and garden, or which do not provide satisfactory information about the implications of the proposal upon a registered historic park and garden, will be refused.

Policy 15

Locally Listed Parks and Gardens

- A. When assessing proposals affecting locally listed historic parks and gardens, particular consideration will be given to their local historic significance and the desirability of preserving or enhancing that significance.

SUSTAINABILITY OBJECTIVE	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15
S01 To make the most efficient use of land and buildings	0	+	0	0	0	0	0	0	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	0	+	0	0	+	0	++	++
S03 To conserve and enhance biodiversity in the Borough	0	0	0	0	0	0	0	+	+
S04 To restrict development which	++	++/?	++	++	++	++	++	++	++

SUSTAINABILITY OBJECTIVE	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15
can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features									
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	0	0	0	0	0	0	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0	0	0	0	0	+	+
S08 To promote development that ensures the sustainable use of energy	++	0	0	0	0	0	0	0	0
S09 To discourage the production of waste and promote	0	0	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15
further the waste hierarchy of minimisation, reuse, recycling and composting									
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	0	0	0	0	0	0	0	0
S11 To improve the education and skills of the Borough	+	0	0	0	0	+	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0	0	0	0	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	0	0	0	0	0	0	0	0
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	0	0	0	0	0	0	0	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15
S16 To reduce crime, fear of crime and anti-social activity	0	+	0	0	0	+	0	0	0

5.6 The conservation and heritage policies in this section score favourably on the sustainability objectives where they have regard to the landscape and streetscape and also on biodiversity, open space and making the most efficient use of land and buildings. They also respond positively to reducing crime, fear of crime and anti-social activity where it is considered that the preservation and enhancement of heritage assets would create a sense of place, belonging and pride in the Borough, thereby improve the wellbeing of Harrow residents.

5.7 The proposed minor modification (shown as strikethrough text) to Policy 11 and its associated reasoned justification removes the requirement to require the reinstatement of locally listed buildings that are demolished and therefore slightly weakens the policy's performance in relation to sustainability objective 4. However the remaining provisions allow consideration of the impact of proposals for demolition (where there is control over this form of development) and of the preservation or enhancement of their local architectural or historic significance. Therefore the overall score for this policy against the sustainability objective is a significant positive effect.

ENVIRONMENTAL SUSTAINABILITY

Policy 16

Managing Flood Risk

- A. Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:
 - a. minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
 - b. wherever possible, reduce flood risk overall;
 - c. ensure a dry means of escape for occupiers of residential development;
 - d. achieve appropriate finished floor levels; and
 - e. not create habitable basements in areas of medium and high flood risk.
- C. Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.
- D. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be resisted. Opportunities will be sought through the redevelopment of previously developed sites in floodplains to restore the natural function and storage capacity of the floodplain.

Policy 17

On Site Water Management and Surface Water Attenuation

- A. Proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run off. Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield run off rates.
- B. The design and layout of major development proposals will be required to:
 - a. use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;
 - b. ensure separation of surface and foul water systems;
 - c. make reasonable provision for the safe storage and passage of flood water in excessive events; and
 - d. demonstrate adequate arrangements for the management and maintenance of the measures used.
- C. Proposals for **minor developments**, householder development, ~~minor commercial extensions~~ and conversions should make use of sustainable drainage measures wherever **feasible** possible and must ensure separation of surface and foul water systems.
- D. Proposals that would fail to make adequate provision for the control and reduction of surface water run off will be refused.

Policy 18

Protection and Enhancement of River Corridors and Watercourses

- A. The design and layout of development on sites containing a main river or ordinary watercourse within the site boundary will be required to maintain an undeveloped buffer zone of an appropriate width.
- B. Applications for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to:
 - a. have regard to the Thames River Basin Management Plan and the London River Restoration Action Plan;
 - b. investigate and, where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse; and
 - c. investigate and, where feasible, secure the implementation of a scheme for restoring culverted sections of river or watercourse.
- C. Where on-site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse.
- D. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which would fail to secure feasible enhancements or deculverting, will be resisted.

Policy 19

Sustainable Design and Layout

- A. Minor development proposals should:
 - a. follow the sustainable design and layout principles set out in the London Plan; and
 - b. have regard to Harrow's Sustainable Building Design supplementary planning document.
- B. Proposals that fail to take reasonable steps to secure a sustainable design and layout of development will be resisted.
- C. Appropriate alterations and adaptations that would reduce carbon dioxide emissions from existing homes and non-residential buildings will be supported.

Policy 20

Decentralised Energy Systems

- A. Proposals for decentralised energy networks will be supported.
- B. ~~Minor~~ Development proposals should connect to existing decentralised energy networks where feasible.

Policy 21

- A. ~~Minor~~Development proposals should incorporate renewable energy technology where feasible.
- B. Proposals for appropriate renewable energy technology on existing homes and non-residential buildings will be supported.

Policy 22

Prevention and Remediation of Contaminated Land

- A. A preliminary land contamination risk assessment will be required with planning applications for:
 - a. the redevelopment or re-use of land known or suspected to be contaminated; and
 - b. proposals for development or activities that pose a significant new risk of land contamination.
- B. Proposals will be considered having regard to
 - a. the findings of the preliminary land contamination risk assessment;
 - b. the compatibility of the intended use with the condition of the land; and
 - c. the environmental sensitivity of the site.
- C. Proposals that fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be resisted.

SUSTAINABILITY OBJECTIVE	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21	Policy 22
S01 To make the most efficient use of land and buildings	++	+	+	+	0	+	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	++	0	+	+	0	0	0
S03 To conserve and enhance biodiversity in the Borough	+	0	++	+	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and	0	0	+	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21	Policy 22
conservation areas) or culturally important features							
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	+	++	++/?	++	++
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	+	+	+	+	0	0	++
S07 To improve water quality and reduce the risk and impact of flooding	++	++	++	+	0	0	++
S08 To promote development that ensures the sustainable use of energy	0	+	0	++	++	++	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	+	+	+/?	+	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	0	0	+	+	+	0
S11 To improve the education and skills of the Borough	0	0	0	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0	+	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21	Policy 22
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	+	+	++	+	0	0	++
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0	0	0	0	+	0
S16 To reduce crime, fear of crime and anti-social activity	0	0	+	0	0	0	0

5.8 The environmental sustainability policies are in place to ensure proposals have regard to the potential impact that development may have on it. It seeks to protect and enhance the natural environment that is beneficial to all, including humans, animals and flora and fauna. The policies meet the sustainability objectives that relate to the safeguarding and promotion of the natural environment. This includes flooding, contamination and pollution; all factors which affect the quality of life for humans, animals and flora and fauna.

5.9 No minor modifications are proposed to Policy 16 but some revisions to paragraph 4.17 of its reasoned justification are proposed, to clarify the application of the policy to previously developed sites within flood zone 3b. As a result it is anticipated that the policy's performance in relation to sustainability objective 1 would improve, as it would allow effective use of previously developed sites within the functional floodplain. As the policy continues to seek opportunities for the restoration of flow routes and storage capacity on previously developed sites there would be no corresponding reduction in the performance of the policy against sustainability objective 7. All other proposed modifications to this chapter involve further clarification/amplification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

Open Space and the Natural Environment

Policy 23

Redevelopment of previously-developed sites within Green Belt and Metropolitan Open Land

- A. The redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land will be supported where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:
- a. the height of existing buildings on the site;
 - b. the proportion of the site that is already developed;
 - c. the footprint and distribution of existing buildings on the site; and
 - d. the relationship of the proposal with any development on the site that is to be retained.
- B. Proposals for the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land will also be required to have regard to:
- a. the visual amenity and character of the Green Belt and Metropolitan Open Land;
 - b. the setting that openness provides for heritage assets within the Green Belt and Metropolitan Open Land; and
 - c. the contribution that the site and its surroundings make to the biodiversity.
- C. The following sites are the strategic, previously-developed sites within the Green Belt:
1. Former RAF Bentley Priory, Common Road, Stanmore
 2. Royal National Orthopaedic Hospital, Brockley Hill, Stanmore;
 3. Harrow College, Brookshill, Harrow Weald; and
 4. Wood Farm, Wood Lane, Stanmore.
- D. In addition to the above criteria, proposals for the strategic, previously-developed sites within the Green Belt will have regard (where relevant) to the development envelope identified on the Policies Map, any supplementary planning document or agreed masterplan relating to the site, and the objectives of the site's redevelopment.
- E. Proposals for inappropriate redevelopment or which, for other reasons, would harm the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

Policy 24

Beneficial Use of the Green Belt and Metropolitan Open Land

- A. Proposals for the beneficial use of land in the Green Belt and Metropolitan Open Land will be supported where the use would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it than the existing use, having regard to:
- a. the visual amenity and character of the Green Belt and Metropolitan Open Land;
 - b. the potential for enhancing public access within the Green Belt and Metropolitan Open Land as part of Harrow's Green Grid;
 - c. the potential use of the land for food production or community gardening;
 - d. the setting that the proposed use would provide for heritage assets within the Green Belt and Metropolitan Open Land;
 - e. the contribution that the site and its surroundings make to the biodiversity (**see Policies 27 and 28**); and
 - f. the desirability of improving the quality of the environment within the Green Belt and Metropolitan Open Land.
- B. Proposals for uses which would harm the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

Policy 25

Protection of Open Space

- A. Land identified as open space on the Harrow Policies Map will not be released for development.
- B. The reconfiguration of land identified as open space on the Harrow Policies Map will be supported where:
 - a. the reconfiguration is part of a comprehensive, deliverable scheme;
 - b. there would be no net loss of open space;
 - c. the reconfiguration would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and
 - d. the release would not be detrimental to any environmental function performed by the existing open space.
- C. Proposals for ancillary development on land identified as open space on the Harrow Policies Map will be supported where:
 - a. it is necessary to or would facilitate the proper functioning of the open space;
 - b. it is ancillary to the use(s) of the open space;
 - c. it would be appropriate in scale;
 - d. it would not detract from the open character of the site or surroundings;
 - e. it would not be detrimental to any other function that the open space performs; and
 - f. it would contribute positively to the setting and quality of the open space.
- D. Proposals that would secure the future of existing ancillary buildings on open space will be supported where:
 - a. there would be no loss of necessary capacity for the proper functioning of the open space; and
 - b. there would be no harm to the quality or proper functioning of the open space as a result of the proposal.
- E. Proposals that would be harmful to open space, having regard to the criteria set out in this policy, will be refused.
- F. Proposals for the inappropriate change of use of open space will be resisted.

Policy 26

Provision of New Open Space

- A. Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Harrow's local recommended standards of provision for all relevant typologies of open space (provided in Table 5.1 below).
- B. The provision of major new pieces of open space should contribute positively to Harrow's Green Grid. In major town centre developments, new civic space may be required as an alternative to green open space.
- C. Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

Policy 27

Protection of Biodiversity and Access to Nature

- A. Proposals that would be detrimental to locally important biodiversity or that would increase local deficiencies in access to nature will be resisted. Regard will be had to any relevant provisions in the Harrow Biodiversity Action Plan.
- B. The design and layout of new development should retain and enhance any significant existing features of biodiversity value within the site. **Potential impacts on biodiversity should be avoided or appropriate mitigation sought.** Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on site or through contributions towards the implementation of relevant projects in Harrow's Biodiversity Action Plan.
- C. Green corridors and green chains will be retained. Proposals that would prejudice their function as routes for the passage of wildlife through the urban environment will be resisted.

Policy 28

Enhancement of Biodiversity and Access to Nature

- A. Opportunities to enhance locally important habitats and to support locally important species will be sought in accordance with the Harrow Biodiversity Action Plan. Where possible, proposals should secure the restoration and re-creation of significant components of the natural environment as part of the design and layout of development. Particular attention will be paid to:
- a. river corridors, including the potential to deculvert sections and enhance wildlife value;
 - b. green corridors and green chains, including the potential to extend or add to the network;
 - c. gardens, including planting for wildlife, green roofs and green walls;
 - d. landscaping, including trees, hedgerows of historical or ecological importance and ponds;
 - e. allotments; and
 - f. habitat creation, such as nesting and roosting boxes, especially when replacing an old building that provided certain habitats.
- B. In areas identified as deficient in access to nature, a high priority will be afforded to opportunities to enhance access through on-site provision or contributions to the implementation of relevant Green Grid projects.

Policy 29

Pinner Chalk Mines

Proposals that enhance the environment and appreciation of Pinner Chalk Mines will be supported.

Policy 30

Trees and Landscaping

- A. The design and layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity value. ~~Proposals that would lead to the unnecessary removal of any trees the subject of tree preservation orders and others of significant amenity value, or which would prejudice their survival, will be resisted.~~
- B. **The removal of trees the subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal.**
- C. The design and layout of development should make provision for a scheme of hard and soft landscaping, including details of any boundary treatment, appropriate to the character of the area and which supports biodiversity. Proposals that leave insufficient space for an appropriate scheme of landscaping will be resisted.
- D. Proposals for works to trees in conservation areas and those the subject of tree preservation orders will be permitted where the works do not risk compromising the amenity value or survival of the tree. There will be a presumption against the removal of trees the subject of tree preservation orders and those in conservation areas that contribute positively to the character of the area.
- E. The Council will require trees identified for retention to be protected during construction and to be retained or replaced where necessary following the completion of the development.

Policy 31

Streetside Greenness and Forecourt Greenery

- A. Proposals for the provision of substantial hard surfacing of forecourts and front gardens should respect the character of the area and will be required to use permeable surfacing and, where appropriate, incorporate a scheme of soft landscaping.
- B. The Council will undertake and encourage new planting of street trees and shrubs, by legal agreement if necessary, and provide, restore and/or maintain grass verges on public and private streets.
- C. Proposals that fail to make appropriate provision for hard and soft landscaping of forecourts, or which fail to contribute to streetside greenery where required, will be refused.

SUSTAINABILITY OBJECTIVE	Policy 23	Policy 24	Policy 25	Policy 26	Policy 27	Policy 28	Policy 29	Policy 30	Policy 31
S01 To make the most efficient use of land and buildings	++	++	++	+	0	0	0	0	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	++	++	++	++	+	++	0	+	+
S03 To conserve and enhance biodiversity in the Borough	++	++	++	+	++	++	0	++	+
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++	++	++	0	0	+	++	++	+
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	+	+	+	+	0	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	+	+	+	+	0	+	++
S08 To promote development that ensures the sustainable use of energy	0	0	0	0	0	0	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0	0	0	0	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	0	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 23	Policy 24	Policy 25	Policy 26	Policy 27	Policy 28	Policy 29	Policy 30	Policy 31
S11 To improve the education and skills of the Borough	0	0	0	0	0	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	0	0	+	0	0	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0	0	0	+	0	0	0	0	0
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	+	+	+	+	+	+	0	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0	0	0	0	0	0	0	0
S16 To reduce crime, fear of crime and anti-social activity	0	0	0	0	0	0	0	0	0

5.10 The open space and the natural environment policies meet the first four sustainability objectives particularly well by concentrating proposals on appropriate land and protecting the open spaces and improving biodiversity within the Borough as well as ensuring development does not negatively affect landscapes. Other positive effects include improvements to air quality and water quality and reducing the risk and impact of flooding through natural drainage to these open spaces. The policies also provide positives to health and wellbeing through enhancing the quality of life through the provision of Green Belt and open spaces.

5.11 The proposed minor modification to Policy 27 (**shown in bold and underline text**) clarifies the policy's approach to the protection of biodiversity, by making clear that (first) avoidance and (then) mitigation of adverse effects is required. This further strengthens the policy's performance against sustainability objective 3, which is already significant positive. The proposed minor modification (**shown in bold and underline text** ~~and strikethrough text~~) to Policy 30 would introduce greater flexibility to the policy to enable the removal of trees where there is a wider public benefit of a proposal. Although this would therefore allow for the removal of TPO or other significant trees in some circumstances, overall the policy's performance in relation to sustainability objective 4 remains significant positive. All other proposed modifications to this chapter involve further clarification/amplification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

HOUSING

Policy 32

Housing Mix

- A. Proposals that secure an appropriate mix of housing on site and which contribute to the creation of inclusive and mixed communities will be supported. The appropriate mix of housing will be determined having regard to:
 - a. the target mix for affordable housing, set out in the Council's Planning Obligations supplementary planning document;
 - b. the priority to be afforded to the delivery of family housing; and
 - c. the location of the site, the character of its surroundings and the need to optimise housing output on previously-developed land.
- B. Proposals that would fail to achieve an appropriate housing mix, or which would fail to contribute to the creation of inclusive and mixed communities, will be refused.

Policy 33

Office Conversions

- A. The Council will manage the Borough's supply of office space in accordance with the objectives of Core Strategy policy CS1. Where offices are found to be redundant, the demolition and redevelopment of these office buildings will be supported. Where this is not feasible, the conversion of offices to residential will be supported where:
 - a. The conversion of offices provide cladding that is suitable to a residential building and in keeping with the character of the area;
 - b. Balconies and/or amenity space are designed into the development as integral facilities and the creation of well designed public realm and landscaping is demonstrated;
 - c. Any additional functional features that are needed such as as pipes, flues or communications equipment are grouped together and routed through existing features where possible, and kept off publicly visible elevations; and
 - d. Proposed apartments should wherever possible be dual aspect. A sole aspect apartment into a parking court or other shared use rear area will generally be unacceptable.
- B. All conversions will be expected to meet design criteria in Policy 1, and to accord with the London Plan's minimum space and lifetime homes standards.

Policy 34

Conversion of Houses and other Residential Premises

- A. The conversion of houses and other residential premises to multiple units will be supported having regard to:
 - a. the adequacy of the internal layout in relation to the living conditions of future occupiers and any impact upon neighbouring occupiers;
 - b. the adequacy of amenity space provision for future occupiers;
 - c. the contribution that the proposal would make to the delivery of accessible homes;
 - d. the impact of the proposal upon the appearance of the property, the character of the area and the amenity of neighbouring occupiers;
 - e. the adequacy of parking, access and refuse/recycling storage arrangements.
- B. Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
- C. Proposals that would lead to an over-intensive conversion, or which would compromise any component of this policy, will be refused.

Policy 35

Amenity Space

- A. Residential development proposals that provide appropriate amenity space will be supported. The appropriate form and amount of amenity space will be determined having regard to:
 - a. the location and dwelling mix;
 - b. the likely needs of future occupiers of the development;
 - c. the character and pattern of existing development in the area;
 - d. the need to safeguard the privacy and amenity of neighbouring occupiers; and
 - e. the quality of the space proposed.
- B. Major residential development proposals should have regard to the contribution that the design and layout of amenity space can make to the objectives of Harrow's Biodiversity Action Plan and Green Grid.
- C. Proposals that would fail to provide appropriate amenity space will be refused.

Policy 36

Protection of Housing

The Council will resist proposals involving a net loss in the number of residential units including any net loss in the number of affordable housing units.

Policy 37

Children and Young People's Play Facilities

- A. New residential proposals which result in a net increase in child yield will be ~~expected~~**required** to provide children and young people's play facilities on-site.
- B. Where a satisfactory level of children and young people's play facilities provision is not achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people play facilities within the local area.
- C. Housing developments outside areas deficient in children and young people's outdoor play facilities will still be expected to provide a contribution towards the maintenance and upgrade of existing children and young people play facilities.

Policy 38

Sheltered Housing, Care Homes and Extra Care Housing

- A. The Council will support proposals on previously-developed land for sheltered housing, care homes and extra care housing (across all tenures) for older people and those who may be vulnerable, provided that the proposal is accessible by public transport with good access to local amenities including shops and community facilities.
- B. The loss of care homes or sheltered housing will only be supported where it can be reasonably demonstrated there is no longer a demand for that use on the site.

Policy 39

Large Houses in Multiple Occupation, Hostels and Secure Accommodation

- A. Proposals for the provision of Large Houses in Multiple Occupation, Residential Hostels and Secure Accommodation will be required to demonstrate that:
 - a. there is good accessibility to local amenities and public transport;
 - b. they accord with Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
 - c. there will be no adverse impact on the amenity of occupiers of neighbouring properties or the character of the area.

SUSTAINABILITY OBJECTIVE	Policy 32	Policy 33	Policy 34	Policy 35	Policy 36	Policy 37	Policy 38	Policy 39
S01 To make the most efficient use of land and buildings	++	++	++	+	++	+	++	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	+	++	0	++	+	0
S03 To conserve and enhance biodiversity in the Borough	0	0	0	++	0	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic,	0	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 32	Policy 33	Policy 34	Policy 35	Policy 36	Policy 37	Policy 38	Policy 39
archaeological sites (listed buildings and conservation areas) or culturally important features								
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	0	0	+	0	+	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0	+	0	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	0	0	0	0	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	+	0	0	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	0	0	0	0	0	+	0

SUSTAINABILITY OBJECTIVE	Policy 32	Policy 33	Policy 34	Policy 35	Policy 36	Policy 37	Policy 38	Policy 39
S11 To improve the education and skills of the Borough	0	0	0	0	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	++	++	++	++	++	++	++	++
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	++	+	+	+	++	++	++	++
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	++	+	+	++	+	++	++	++
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0	0	0	0	0	0	0
S16 To reduce crime, fear of crime and anti-social activity	+	+	+	+	+	+	+	+

5.12 The housing policies perform well in relation to sustainability objectives 01, 13 and 14, in particular by making the most efficient use of land and buildings, promoting high density development where appropriate, integrating communities through design and thereby improving the health and wellbeing of residents. Reducing social exclusion may also reduce crime, which contributes to the 16th sustainability objective.

5.13 Proposed minor modifications to the reasoned justification of Policy 37 provide further clarification of the circumstances in which off site provision for children's and young people's play facilities may be made. In so doing the revised text will further strengthen the performance of this policy against sustainability objective 13, which is already significant positive. All of the other proposed modifications to this chapter involve further clarification/amplification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

EMPLOYMENT AND ECONOMIC DEVELOPMENT

Policy 40

Supporting Economic Activity and Development

Honeypot Lane Strategic Industrial Location

- A. Proposals for economic development and uses, and appropriate ancillary supporting uses, which are appropriate Industrial Business Park activities will be permitted on land identified on the Harrow Policies Map as forming the Honeypot Lane Strategic Industrial Location, subject to the consideration of any impacts listed under Criterion E.

Business Use and Industrial & Business Use Areas

- B. Proposals for economic development and uses, and appropriate ancillary supporting uses, will be permitted on existing industrial and business use land subject to the consideration of any impacts listed under Criterion E.

Comprehensive Redevelopment of Business Use and Industrial & Business Use Areas

- C. Comprehensive redevelopment of industrial and business use estates which improve their fitness for purpose is encouraged subject to the consideration of impacts listed under Criterion E. The Council will support partial residential development for live/work units as part of any comprehensive scheme where:
- an assessment of demand and supply demonstrates that there is a material surplus of industrial and business use land in the Borough, taking into account any unimplemented planning permissions;
 - the comprehensive scheme would achieve demonstrable improvements in fitness for purpose;
 - it can be demonstrated that residential development is necessary to facilitate the delivery of a comprehensive scheme;
 - the residential component is limited to that which is necessary to achieve the delivery of a comprehensive scheme; and
 - there would be no conflict between the residential and economic uses within or surrounding the site.
- D. The Council will secure the delivery of all the benefits proposed in a comprehensive scheme by Planning Obligation.

Surplus Industrial and Business Use Land and Floorspace

- E. Existing industrial and business use land and floorspace will only be considered to be surplus to requirements where:
- an assessment of demand and supply demonstrates that there is a surplus in the Borough, taking into account any unimplemented planning permissions;
 - the assessment of demand and supply demonstrates that there are no other, sequentially ~~more~~**less** preferable sites that are surplus to requirements; and
 - whether the proposed development and uses contribute to the spatial strategy set out in Harrow's Core Strategy.

- F. For the purposes of the assessment required under (b) above, the sequential order of preference for site release is:
 - i. land and buildings not identified on the Policies Map as forming part of a designated industrial and business use or business use area;
 - ii. land and buildings identified on the Policies Map as forming part of a designated industrial and business use or business use area and which are assessed as being no longer fit for purpose;
 - iii. land and buildings identified on the Policies Map as forming part of a designated industrial and business use or business use area;
 - iv. land and buildings identified on the Policies Map as forming part of a strategic industrial location and which are assessed as being no longer fit for purpose;
 - v. land and buildings identified on the Policies Map as forming part of a strategic industrial location.
- G. Subject to (E) and (F) above, where a site is considered to be surplus to requirements the Council will expect the feasibility of wider economic uses (e.g. employment-related skills and training) or for essential community infrastructure not appropriate to town centre locations (e.g. Police patrol bases and custody centres) to be investigated.
- H. Proposals that meet the infrastructure needs of emergency services on industrial and business use land will be supported where there is a proven need for the facility which outweighs the loss of employment land capacity.

Policy 41

Town Centre Offices and Northolt Road Business Use Area

- A. Proposals for the redevelopment or change of use of purpose-built offices located in town centres and the Northolt Road business use area will be permitted where it can be demonstrated that:
 - a. the building is no longer fit for office occupation having regard to the level and duration of vacancies within the building, the age and condition of the building, and the needs of potential occupiers in the local office market; and
 - b. an assessment of demand and supply demonstrates that there is a surplus of office space throughout the Borough, taking into account any unimplemented planning permissions.
- B. Proposals for the comprehensive redevelopment or change of use of **existing** buildings ~~of which provide~~ 1,000 or more square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses. The scale of replacement office or other economic uses required will be informed by the role and function of the town centre, the proposal's overall contribution to employment, the employment yield of the floorspace in the existing building, the value of any community benefits including the provision of affordable housing, and development viability.

Offices outside of town centres

- B. The redevelopment or change of use of offices in other locations beyond the Intensification Area will be permitted where an assessment of demand and supply demonstrates that there is a surplus of office space in the Borough, taking into account any unimplemented planning permissions.

Policy 42

Managing Economic Activities and Development

Assessment of Impacts of Economic Activities and Development

- A. Proposals for economic development and uses will be resisted where:
- there would be an adverse impact upon the amenity of any neighbouring residential occupiers or the character of the area;
 - the proposal would prejudice the proper functioning of any neighbouring economic activity;
 - the proposal would be inappropriately located having regard to likely number and modal split of trips generated, the public transport accessibility level of the site and the capacity of the highway network; and
 - the proposal would not make satisfactory arrangements for servicing, parking and inclusive access.

Main Town Centre Uses

- B. Town centre development and uses will not be permitted on existing industrial and business use land other than:
- the provision of appropriate ancillary supporting uses;
 - existing industrial and business use land within a town centre boundary; or
 - existing industrial and business use land on the edge of a town centre, where there is a need for the development and application of the sequential test for town centre uses has failed to identify a suitable site within a town centre boundary.

Policy 43

Working at Home

- A. Home working and ancillary economic activity at home by the occupiers of residential property will be permitted where the applicant can demonstrate that:
- the property would remain substantially residential in character and occupation;
 - there would be no detrimental impact upon the amenities of neighbouring occupiers by reason of noise, pollution, levels of internal or external activity, traffic and parking; **and**
 - the proposal would not undermine Harrow's spatial strategy.**
- B. Proposals for live/work units will be supported where these do not compromise other policy objectives, including those for the management of industrial and business use land supply.
- C. Proposals for home working and ancillary economic activity that would result in the substantial loss of a dwelling, or which would be detrimental to the amenity of neighbouring occupiers, will be refused.

Policy 44

Hotel and Tourism Development

- A. Proposals for new hotel development outside of the Harrow & Wealdstone Intensification Area will be directed to sites in accordance with the following sequential order of preference:
- i. town centres;
 - ii. edge of centre;
 - iii. areas with a high public transport accessibility level.
- B. All major proposals for hotel and tourist attractions will be required to produce a transport assessment supported by a Green Travel Plan to enhance sustainable access to the site.
- C. New hotel development and tourist attractions, and alterations or extensions to existing premises, must achieve inclusive access and contribute to the creation of lifetime neighbourhoods. New hotel development providing 10 or more rooms must achieve a minimum 10% wheelchair accessible rooms.
- D. Proposals for guest houses and bed & breakfast accommodation will be permitted provided that:
- a. the size and character of the site or building are suitable for the proposed use;
 - b. the development will be compatible with the character and appearance of the area;
 - c. the residential amenities of local residents will not be harmed by way of noise, disturbance, loss of light or privacy;
 - d. where practical, the building will be wheelchair accessible;
 - e. it would not result in an over-concentration of the type of accommodation within the locality;
 - f. there will be good access and links or opportunities for good access and links to modes of transport other than the private vehicle; and
 - g. vehicle access to and from the highway will be safe.
- E. The Council will encourage the development and improvement of tourist related attractions and facilities, provided there is no unacceptable impact on the environment or residential amenity. Preference will be given to proposals for tourist facilities that also meet local cultural and recreational needs.

Policy 45

Loss of Public Houses

The Council will not permit the redevelopment or change of use of purpose-built public houses unless:

- a. the proposal would support the evening economy (in town centre locations) or provide community uses; or
- b. it is demonstrated that the public house is no longer economically viable and reasonable attempts have been made to market the site as a public house.

SUSTAINABILITY OBJECTIVE	Policy 40	Policy 41	Policy 42	Policy 43	Policy 44	Policy 45
S01 To make the most efficient use of land and buildings	++	++	0	+	+	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	0	0	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0	0	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0	0	0	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	0	+	+	+	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	+	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	0	+	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 40	Policy 41	Policy 42	Policy 43	Policy 44	Policy 45
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	++	+	++	++	++
S11 To improve the education and skills of the Borough	++	++	+	0	+	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	+	0	0	++
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	0	0	+	+	0	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	++	++	+	++	+
S16 To reduce crime, fear of crime and anti-social activity	+	+	+	+	+	+

5.14 The employment and economic development policies score well against sustainability objectives 05, 10 and 11 in helping to address air quality, economic development and education/skills. They also improve town centres generally and is considered to reduce crime rates as a high level of activity is assumed particularly within the town centres.

5.15 The proposed minor modification to Policy 43 (**shown in bold and underline text**) and associated revisions to the reasoned justification would strengthen the DPD's implementation of Harrow's spatial strategy by ensuring that the implementation of the policy does not lead to uses within residential areas that should be directed to town centres. As a result it is considered that the policy, with the proposed modifications, would have a minor positive effect against sustainability objective 15. All of the other proposed modifications to this chapter involve further clarification/amplification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

TOWN CENTRES AND NEIGHBOURHOOD PARADES

Policy 46

New Town Centre Development

A. New retail, leisure and cultural development or extensions within town centres will be supported where:

- a. the proposal is consistent in use and scale with the role and function of the centre; and
- b. the proposal is not at odds with the Borough's spatial strategy.

Proposals on edge-of-centre sites will be permitted where it has been demonstrated through site search and selection that the location is the most sequentially preferable that is available, and that there would be no harm to town centres.

B. Proposals for new retail and cultural development in out of centre locations, including proposals for extensions, will only be permitted where:

- a. flexibility has been demonstrated in the format of the proposed development;
- b. it has been demonstrated through site search and selection that there are no appropriate in-centre sites;
- c. it has been demonstrated through site search and selection that there are no appropriate edge-of-centre sites;
- d. it has been demonstrated through impact assessment that there would be no harm to town centres; and
- e. the proposal is supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network.

C. Retail, leisure and cultural development **within town centre boundaries or designated neighbourhood parades** including extensions of ~~400~~**100** square metres or less will be assessed without the need for sequential assessment.

Policy 47

Primary Shopping Frontages

- A. Within the primary shopping frontages of district centres as defined on the Harrow Policies Map, the use of ground floor premises for retail, financial & professional activities, restaurants & cafés and pubs & bars will be permitted provided that:
 - a. the length of primary frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 25% unless it can be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - b. the proposal would not result in a concentration of more than three unit frontages in non-retail use;
 - c. the use would not create inactive frontage during the day; and
 - d. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety.
- B. Proposals for other uses within primary shopping frontages will not be permitted unless it can be demonstrated that the use would be directly related to shopping trips and would support the retail function of the district centre.

Policy 48

Secondary and Designated Shopping Frontages

- A. Within the secondary shopping frontages of district centres and the designated frontages of local centres, as defined on the Harrow Policies Map, the use of ground floor premises for purposes that are appropriate to a town centre and primarily for visiting members of the public will be permitted provided that:
 - a. in the case of local centres, the length of designated frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 50% unless it can be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - b. in the case of district centres, the length of secondary frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 50% unless it could be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - c. in the case of uses that would not create an active frontage, a window display or other frontage appropriate to the centre would be provided; and
 - d. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety.

Policy 49

Other Town Centre Frontages and Neighbourhood Parades

- A. Within the non-designated parades of town centres and neighbourhood parades, as defined on the Harrow Policies Map, the use of ground floor premises for purposes that are appropriate town centre, community and economic uses will be permitted provided that:
 - a. in the case of non A class uses, a window display or other frontage appropriate to the centre would be provided; and
 - b. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety.

Policy 50

Vacant Shops in Town Centres and Neighbourhood Parades

- A. In town centres and neighbourhood parades with a vacancy rate exceeding 20% over a continuous period of two or more years, the use of ground floor premises that have been vacant and marketed for a period of one year will be permitted as follows:
 - a. within the primary shopping frontages of district centres, use for retail, financial & professional activities, restaurants & cafés and take-aways;
 - b. within the secondary frontages of district centres and designated frontages within local centres, any use appropriate to a town centre and primarily for visiting members of the public;
 - c. within non-designated frontages of centres and neighbourhood parades, any appropriate economic or community use.
- B. Proposals for the temporary use of ground floor premises that are vacant will be permitted whilst marketing is undertaken for a period of up to 5 years.
- C. Proposals that would be detrimental to the amenity of neighbouring occupiers or highway safety will not be permitted.
- D. Residential use of ground floor premises in town centres and neighbourhood parades will not be permitted under any circumstances.

Policy 51

Mixed-Use Development in Town Centres

- A. Proposals for mixed use development in town centres will be supported. The appropriate mix of uses will be considered having regard to:
- the role and function of the centre;
 - the need to make efficient and effective use of previously-developed land;
 - the need to re-provide certain uses on the site in accordance with other policies;
 - the compatibility of the uses proposed; and
 - any other planning objectives considered to be a priority for the area.
- B. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

Policy 52

Evening Economy

- A. Proposals which enhance the evening economy of town centres will be supported having regard to:
- the role and function of the centre;
 - the impact upon the amenity of residential occupiers within and adjoining the centre; and
 - any parking or traffic implications.
- B. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

SUSTAINABILITY OBJECTIVE	Policy 46	Policy 47	Policy 48	Policy 49	Policy 50	Policy 51	Policy 52
S01 To make the most efficient use of land and buildings	++	0	0	0	+	++	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0	0	0	0	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0	0	0	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological	0	0	0	0	0	0	0

SUSTAINABILITY OBJECTIVE	Policy 46	Policy 47	Policy 48	Policy 49	Policy 50	Policy 51	Policy 52
sites (listed buildings and conservation areas) or culturally important features							
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	++	0	0	0	0	0	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0	0	0	0	0
S08 To promote development that ensures the sustainable use of energy	+	+	+	+	0	+	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0	0	0	+	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	++	++	++	++	++	++
S11 To improve the education and skills of the Borough	++	++	++	++	+	+	+
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0	0	0	+	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	+	+	++	+	+

SUSTAINABILITY OBJECTIVE	Policy 46	Policy 47	Policy 48	Policy 49	Policy 50	Policy 51	Policy 52
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	+	0	0	0	0	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	++	++	++	++	++	++	++
S16 To reduce crime, fear of crime and anti-social activity	+	+	+	+	+	+	+

5.16 The town centres and neighbourhood parades sustainability objectives concerned with economic development score well for areas concerned with town centre and retail development. They also provide opportunity to promote sustainable use of energy, waste management and reduce levels of crime in such areas.

5.17 The proposed minor modification to Policy 46 (**shown in bold and underline text**) and associated revisions to the reasoned justification would help to facilitate minor extensions in town centres and neighbourhood parades but would ensure that a sequential assessment would still be applied to similar proposals elsewhere. This would further strengthen the policy's performance against sustainability objective 15, which already registers as a significant positive effect.

TRANSPORT AND WASTE

Policy 53

Parking Standards

- A. Proposals that make on-site provision for parking will be supported where:
 - a. the number of vehicle parking spaces (including those with electric vehicle charging points) would have regard to the maximum London Plan standards;
 - b. there would be appropriate provision for scooter and motorcycle parking; and
 - c. the number of cycle parking spaces would meet or exceed the minimum London Plan standards.
- B. Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements, any special safety considerations and the desirability of achieving modal shift away from private car use.
- C. Proposals for car-free development within town centres will be supported where it can be demonstrated that:
 - a. there is sufficient public transport capacity to serve the trip demand generated by the development;
 - b. there would be adequate safeguards against parking on the surrounding highway network and in public car parks; and
 - c. the needs of blue badge holders would be met.
- D. Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be ~~supported~~**encouraged**.
- E. The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose. Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists.
- F. Proposals that would result in inappropriate on-site parking provision, having regard to the criteria in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.

Policy 54

Transport Assessments and Travel Plans

- A. Proposals for major development will be required to submit a Transport Assessment to quantify the impacts of the proposal upon public transport, the highway network, the cycle network and upon conditions for pedestrians (**see Policy 2C**). Where multiple major developments are proposed in the area, the Council will encourage developers to co-operate to assess the cumulative impacts of the proposals upon transport.
- B. Proposals for major development will be required to satisfactorily mitigate the impacts identified in the Transport Assessment. Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should include the preparation and implementation of Travel Plans.
- C. Proposals that fail to satisfactorily mitigate the transport impacts of development will be resisted.

Policy 55

Servicing

- A. Non-residential proposals will be required to make arrangements for servicing that maintain or improve the safety and flow of traffic on the public highway, and which protect the amenity of neighbouring occupiers. Proposals will be assessed having regard to:
 - a. the relationship of the proposal with the surrounding highway network;
 - b. the availability of service roads; and
 - c. any existing safety concerns.
- B. Proposals for major development should make satisfactory arrangements for access to and servicing within the site during construction.
- C. Proposals that would be detrimental to safety, traffic flow or the amenity of neighbouring occupiers will be resisted.

Policy 56

Waste Management

- A. All proposals will be required to make on-site provision for the reduction of general waste, the separation of recyclable materials and the collection of organic material for composting. The on-site provision must:
- a. provide satisfactory storage volume to meet the general, recycling and organic waste material arising from the site;
 - b. ensure satisfactory access for collectors and, where relevant, collection vehicles; and
 - c. be located and screened to avoid nuisance to occupiers and adverse visual impact.
- B. Major development proposals will be required to provide a site waste management plan as part of proposals to include:
- a. setting aside land for the duration of the construction period to facilitate the sorting and storing of inert waste material; and
 - b. waste management during the lifetime of the development.

SUSTAINABILITY OBJECTIVE	Policy 53	Policy 54	Policy 55	Policy 56
S01 To make the most efficient use of land and buildings	+	+	+	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	0	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	+
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	0	0	+

SUSTAINABILITY OBJECTIVE	Policy 53	Policy 54	Policy 55	Policy 56
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0	++
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	0	+	+
S11 To improve the education and skills of the Borough	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	0	0
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	+	+	0	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	++	++	+	0
S16 To reduce crime, fear of crime and anti-social activity	+	+	+	0

5.18 The transport and waste policies concentrate on parking standards and waste management. By implementing maximum parking standards, in line with the London Plan, and promoting waste reduction in new development, the policies perform well when assessed against sustainability objectives 05 and 09 respectively.

5.19 The proposed modifications to this chapter involve further clarification/amplification and have no material effect upon the performance of the DPD in relation to the sustainability objectives.

COMMUNITY INFRASTRUCTURE

Policy 57

New Community, Sport and Education Facilities

- A. Proposals for the refurbishment and re-use of existing premises for community, sport and educational facilities will be supported.
- B. Proposals for the provision of new community, sport and educational facilities will be supported where:
 - a. they are located within the community that they are intended to serve;
 - b. subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and
 - c. there would be no adverse impact on residential amenity or highway safety.
- C. New education and indoor sport development should make provision for community access to the facilities provided.
- D. Proposals for the conversion of offices to community and educational uses will be considered having regard to:
 - a. the principle of the loss of office space in accordance with Policy 41;
 - b. the impact of the use upon on other legitimate uses within the building and neighbouring buildings; and
 - c. the adequacy of parking and access arrangements.
- E. Proposals that would compromise any component of this policy will be refused.

Policy 58

Retention of Existing Community, Sport and Education Facilities

- A. Proposals involving the loss of an existing community, sport or educational facility will be resisted unless:
 - a. there is no longer a need for that facility; or
 - b. there are adequate similar facilities nearby; or
 - c. the redevelopment of the site would secure an over-riding public benefit.
- B. Proposals for the redevelopment of community or educational facilities that secure enhanced re-provision on the site, or on another site which improves accessibility, will be supported.

Policy 59

Enhancing Outdoor Sport Facilities

- A. Proposals that would increase the capacity and quality of outdoor sport facilities, ancillary activities that support sporting activities, and those that would secure community access to private facilities, will be supported provided that:
- a. there would be no conflict with Green Belt, Metropolitan Open Land and open space policies;
 - b. the proposal would not be detrimental to any heritage or biodiversity assets within or surrounding the site; and
 - c. there would be no adverse impact on residential amenity or highway safety.
- B. Proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity.

SUSTAINABILITY OBJECTIVE	Policy 57	Policy 58	Policy 59
S01 To make the most efficient use of land and buildings	++	++	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	++
S03 To conserve and enhance biodiversity in the Borough	0	0	++
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0	++
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	0	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0
S08 To promote development that ensures the sustainable use of energy	+	0	0

SUSTAINABILITY OBJECTIVE	Policy 57	Policy 58	Policy 59
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	+	0
S11 To improve the education and skills of the Borough	++	++	+
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	++	++	++
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	++	++	++
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	+	0	0
S16 To reduce crime, fear of crime and anti-social activity	+	++	++

5.20 The transport policy generally has a positive outcome in meeting the broad principles of all of the sustainability objectives and in particular to 13 where it can help to reduce social exclusion and facilitate the development of mixed and balanced communities.

TELECOMMUNICATIONS

Policy 60

Telecommunications

- A. Proposals for the installation of telecommunications equipment will be supported where it can be demonstrated that:
- a. the installation would be on an existing mast or building or, if a new mast is proposed, that it has not been not possible to find a suitable existing mast or building to meet operational requirements;
 - b. the siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant) and the appearance and character of the area;
 - c. there would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value;
 - d. the installation would comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for public exposure; and
 - e. street-based installations would contribute to the principles of lifetime neighbourhoods including the rationalisation of any existing cabinets or other equipment.
- B. Proposals for major development should make provision for communal satellite and digital television receiving equipment.
- C. Proposals that would prejudice any component of this policy will be refused.

SUSTAINABILITY OBJECTIVE	Policy 60
S01 To make the most efficient use of land and buildings	+
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	++
S03 To conserve and enhance biodiversity in the Borough	++
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0
S07 To improve water quality and reduce the risk and impact of flooding	0
S08 To promote development that ensures the sustainable use of energy	0

SUSTAINABILITY OBJECTIVE	Policy 60
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+
S11 To improve the education and skills of the Borough	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	++
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0
S16 To reduce crime, fear of crime and anti-social activity	0

5.21 The policy seeks to ensure that the visual effect of proposals are considered as well as health issues, thereby contributing positively to sustainability objectives 04 and 14.

IMPLEMENTATION, RESOURCES AND MONITORING

Policy 61

Planning Obligations

- A. Planning Obligations which meet the required tests will be sought for:
 - a. site and proposal specific infrastructure;
 - b. on-site utilities including decentralised energy systems;
 - c. affordable housing; and
 - d. any other provisions that cannot be dealt with as a planning condition.
- B. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

Policy 62

Enforcement

- A. The Council will take enforcement action that is proportionate to the breach of planning control where:
- a. there is demonstrable harm to an interest of acknowledged planning importance; and
 - b. it is expedient to take action in the public interest.

SUSTAINABILITY OBJECTIVE	Policy 61	Policy 62
S01 To make the most efficient use of land and buildings	0	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0
S08 To promote development that ensures the sustainable use of energy	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	0
S11 To improve the education and skills of the Borough	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	++	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0	0

SUSTAINABILITY OBJECTIVE	Policy 61	Policy 62
S14 To improve the health and wellbeing of Harrow Residents and reduce inequalities in health	0	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0
S16 To reduce crime, fear of crime and anti-social activity	0	0

5.22 The policies in this section relate to more procedural aspects of development management, namely the requirement for Planning Obligations and use of the Council's enforcement powers. Consequently they give effect to other policies in this DPD (as well as the policies of the Area Action Plan and the London Plan where these apply) but are of limited relevance in themselves to the 16 sustainability objectives. However it is noted that Policy 61 has a direct positive effect when assessed against sustainability objective 12, reflecting the fact that Planning Obligations will continue to be used as the principal mechanism for securing affordable housing.

Background to the Site Allocations Development Plan Document

6.1 The Site Allocations DPD forms part of Harrow's Local Development Framework and gives effect to the Core Strategy by allocating sites for residential development for the sub areas of the Borough beyond the Harrow & Wealdstone Intensification Area. It also identifies new and revised designations relating to retail policy, open space and biodiversity which will be shown on the revised Harrow Policies Map. Sites and designations within the Intensification Area will be included in the Area Action Plan and are not therefore included in the Site Allocations DPD.

6.2 The preparation of Harrow's Core Strategy has been informed by its own sustainability appraisal. The sustainability appraisal has helped to shape the spatial strategy and policies of the Core Strategy which form the context for the Site Allocations DPD. This sustainability assessment does not therefore seek to revisit the appraisal of the Core Strategy, but instead focuses on the performance of the development sites and site designations set out in the DPD against the 16 sustainability objectives established in Harrow's Sustainability Appraisal Scoping Report (2006).

Sustainability Appraisal of the Site Allocations Development Plan Document

6.3 A 'two tier' approach to the appraisal of the Site Allocations DPD has been adopted. Firstly, the assessment considers the overall performance of the DPD against Harrow's sustainability objectives. Secondly, the assessment has appraised each site included in the document against the objectives. The assessment has been carried out by Council officers and the following scoring symbols is used in the tables below to identify positive and/or negative effects.

Key to Symbols Used in the Appraisal

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Appraisal of the Site Allocations DPD

Assessment of the Site Allocations Approach		
Sustainability Objectives	Score	Justification

Assessment of the Site Allocations Approach

<p>To make the most efficient use of land and buildings</p>	<p>++</p>	<p>The Allocations seek to encourage new housing growth and development on previously developed sites, and in areas across the Borough with good public transport accessibility. They seek to provide a choice of town centre and edge of centre sites for retail development and encourage mixed-use redevelopment of certain under-used or vacant employment sites to secure better use and job creation. They also seek to ensure that retail and employment designations are appropriate to utilise these areas of land efficiently.</p>
<p>To protect the quality, quantity and accessibility of open spaces in the Borough</p>	<p>++</p>	<p>Through the allocations increased provision and access to open space is sought, alongside increased biodiversity protection, which can help ensure residents have access to the outdoor environment for formal and passive recreational activity. The DPD sets out a number of small sites to be included as publicly accessible open space alongside some larger extensions to existing sites, and so this will result in a net increase in publicly accessible open space provision in the Borough. There would also be the indirect benefit of delivery of development needs on previously-developed sites, thereby reducing future pressure for new development on open space sites.</p>
<p>To conserve and enhance biodiversity in the Borough</p>	<p>++</p>	<p>The DPD outlines changes to SINCS, including extending the boundaries of existing sites, and the introduction of a number of new SINCS. This will positively benefit biodiversity by giving these areas an increased level of protection. There would also be the indirect benefit of delivery of development need on previously-developed sites, thereby reducing future pressure for new development on open space sites of biodiversity value.</p>
<p>To ensure the Borough's historic environment is maintained and enhanced including its historic landscape and streetscape, listed</p>	<p>+</p>	<p>The Core Strategy and Development Management Policies are the principal mechanisms for achieving this sustainability objective, but the Site Allocations DPD</p>

Assessment of the Site Allocations Approach		
buildings, conservation areas, archaeological sites and priority areas and culturally important features		contributes by highlighting specific context to the development sites listed (including conservation areas, listed buildings, and Areas of Special Character)
To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)	?	<p>The Site Allocations DPD gives effect to the Core Strategy spatial strategy for the Borough, to direct development to sites in town centres and other locations well served by public transport. It therefore contributes to the delivery of development in locations that encourage a modal shift away from private car use.</p> <p>The allocated sites, when developed, will produce a degree of air pollution through dust particles as a result of construction and demolition works. The Development Management DPD seeks to minimise these effects through policies designed to ensure development mitigates these effects as far as possible.</p>
To reduce pollution of land (soil) and ensure that contaminated land is remediated	+	Most sites allocated are on previously developed sites, and so any remediation needed will have to take place before development commences. This matter is dealt with through the Development Management DPD. By ensuring that development needs are met on previously-developed sites the Site Allocations DPD also helps to prevent the potential contamination of greenfield land.
To improve water quality and reduce the impact of flooding	+	Harrow is subject to surface water and fluvial flooding which is exacerbated by 'urban creep' and impermeable surfaces, particularly within the central part of the Borough. The Site Allocations DPD has been informed by a sequential assessment of sites carried out in the Level 1, Level 2 and Level 2 Addendum Strategic Flood Risk Assessment reports. Where necessary the exception test has also been applied to sites in accordance with the National Planning Policy Framework. The DPD directs development to areas of

Assessment of the Site Allocations Approach

		<p>appropriate flood risk and, where the exception test has been applied, allows development to take place where this is needed to achieve other sustainability outcomes. The DPD therefore generally performs well against this objective.</p> <p>The Development Management Policies deal with measures to reduce flood risk and improve water quality in the Borough in line with the overarching principles for dealing with flood risk set out in the Core Strategy.</p>
To promote development that ensures the sustainable use of energy	+	The Core Strategy and Development Management Policies are the principal mechanisms for achieving this sustainability objective, but the Site Allocations DPD contributes by allocating many sites within highly accessible locations.
To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	This matter is primarily dealt with through the Joint West London Waste DPD and through the draft Development Management DPD.
To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	The Allocations DPD consolidates some employment use areas, and extends and amends some retail frontages to ensure that there is sufficient suitable land to meet the needs of business and to enable employment generating business to grow and develop further in the right locations. In particular, it identifies sites/locations for employment-led, mixed-use redevelopment to secure provision of space that meets the needs of small and medium-sized enterprises and therefore better reflect the space requirements of the local economy. The DPD therefore performs well against this objective.
To improve the education and skills of the Borough	+	By ensuring that sufficient land is allocated for employment use, the local job market can be maintained and so skills can be developed locally through training schemes at local business in partnership with Harrow's schools and colleges.

Assessment of the Site Allocations Approach		
<p>To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents</p>	++	<p>There is a strong emphasis to allocate sites for housing use throughout the Borough to meet local needs and targets, including the provision of affordable housing. The DPD allocates sufficient deliverable sites which, together with planning permissions already granted, and completions, contribute to the Borough meeting and exceeding its housing target for the plan period. The site allocations will work in combination with the London Plan, the Core Strategy and the Development Management Policies DPD to ensure that each site makes the fullest contribution to the delivery of affordable housing.</p> <p>The Site Allocations DPD also makes provision for redevelopment to re-provide supported/sheltered housing on three identified sites.</p>
<p>To reduce social exclusion and facilitate the development of mixed and balanced communities</p>	+	<p>The Allocations show where employment-led redevelopment will be supported, and the reclassification of certain retail frontages to ensure that the application of the retail policies remains relevant to the role and function of centres. In so doing it will ensure that employment opportunities, retail and other services are locally available to everyone regardless of car ownership. The DPD also ensures the delivery of housing and affordable housing (see above) which will also contribute positively to social inclusion and the creation of mixed and balanced communities.</p>
<p>To improve the health and wellbeing of Harrow's residents and reduce inequalities in health</p>	+	<p>The allocations provide for an improved replacement Health Centre at Belmont to assist the local health service in their redevelopments.</p> <p>Through the allocations increased provision and access to open space is also sought, alongside increased biodiversity protection, which can help ensure residents have access to the outdoor environment to utilise for</p>

Assessment of the Site Allocations Approach

		<p>healthy recreational pursuits, alongside the air quality improvements that can arise from increased open space provision. Local access to jobs, retail and other services (see above) can also be important determinants of health/wellbeing, and the DPD therefore also contributes positively in these regards.</p>
<p>To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow</p>	<p>++</p>	<p>The Site Allocations DPD makes provision for a range of sites for new retail development, of varying scale, on sites within or at the edge of town centres. In so doing the DPD will help to direct new development to locations that will support existing town centres. Sites identified in the Retail Study (2009) not within or on the edge of centres have not been included in the DPD as these would be at odds with this objective.</p> <p>The Allocations also allow for the reclassification of certain retail frontages to ensure that the application of the retail policies remains relevant to the role and function of centres, and primary shopping areas are identified in four of the Borough's larger district centres to help ensure the proper application of policies which direct new retail development to the retail core of centres.</p>
<p>To reduce crime, fear of crime and anti-social activity</p>	<p>+</p>	<p>The Site Allocations DPD will support the delivery of housing, jobs and infrastructure (including services) within the Borough, thereby helping to prevent crime.</p> <p>Through allocating sites, the Council will seek public realm improvements, pedestrian access and natural surveillance solutions to design out crime, in line with policies in the Core Strategy and Development Management DPD.</p>

Key Sustainability Findings

Assessment of the Site Allocations Approach

Social	++	<p>As noted above, the Site Allocations DPD identifies sufficient land which, together with 'pipeline supply' and the provisions of the Area Action Plan, will help to meet and exceed the Core Strategy target for housing growth in the Borough over the plan period 2009-2026. The DPD will also work in conjunction with policies to ensure that affordable housing forms a significant part of housing delivery over the plan period. Together with local employment opportunities through employment-led mixed-use redevelopment on sites, and retail and other development, the DPD will contribute to the delivery of local employment opportunities. The DPD, by helping to deliver development, will contribute through Planning Obligations and the Community Infrastructure Levy, help to ensure that infrastructure and services and delivered to meet the needs made necessary by population growth over the plan period.</p>
Economic	++	<p>The DPD has a direct economic benefit by identifying sites for employment-led mixed use redevelopment and new retail development. Indirectly, the DPD will support the construction sector through housing growth. It will also support existing/new economic activity within town centres by ensuring that designated frontages reflect the reality on the ground to ensure town centres across the Borough remain viable destinations. The inclusion of neighbourhood parades will further the protection of employment uses across the Borough, and the identification of Primary Shopping Areas will help to ensure that retail development is retained and located in the most appropriate place.</p>
Environmental	++	<p>The Site Allocations DPD gives effect to the Core Strategy by enabling the Borough's development needs over the plan period to be met on previously-developed land, and in town centres/other locations will served by public transport, and in areas of appropriate</p>

Assessment of the Site Allocations Approach

	<p>flood risk having regard to the sequential assessment. Therefore the DPD will help to ensure the retention of open space/greenfield sites, manage air pollution and to mitigate the impacts of flooding.</p> <p>The Site Allocation identify also includes sites for the provision of new publically accessible open space, alongside the extension of existing accessible open spaces, and increased public access. The DPD also identifies extensions to, as well as new, sites of importance for nature conservation (SINCS), which will have a beneficial effect on the environment.</p>
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6.4 The results of this high level assessment indicate that there are a number of direct positive impacts in relation to many of the sustainability objectives from the DPD and no high level negative impacts have been identified. In the absence of a Site Allocations DPD development proposals on individual sites would be assessed against the relevant planning policy framework, which has been designed to deliver sustainable development. However the Site Allocations DPD provides an additional level benefit in that it can be proactive in identifying opportunities based on site context and involving local communities. In so doing, it helps to avoid reliance on potentially less sustainable/appropriate windfall sites to meet the Borough's development needs. In addition, by engaging with landowners and developers, the Site Allocations DPD can also assist delivery by pro-actively setting up an approach to site development in the early stages.

Appraisal of Sites

6.5 A range of sites have been considered in preparing the Site Allocations DPD. These include sites brought forward as a result of two call for sites exercises conducted in 2009 and 2010, as well as strategic housing sites identified in Harrow's Annual Monitoring Report housing trajectory which is informed by a Strategic Housing Land Availability Assessment. Other sites have been identified through consultation with partner organisations and the Council (as landowner). Open space sites that have been included were identified through a PPG17 Study, conducted in 2010, and a number of new biodiversity sites were identified and recommended for designation by the Greater London Authority (GLA) in 2003, however these sites have not yet been formally adopted and so are also included in the document.

6.6 In selecting sites for inclusion in the DPD, a number criteria were used. These include: size; deliverability; existing designated uses; environmental constraints; and consistency with the Borough's spatial strategy. In particular, it should be noted that previously-developed sites within the Green Belt and Metropolitan Open Land have only be allocated where their

redevelopment would contribute to a benefit of strategic importance to the Borough; the DPD does not seek to include all possible previously-developed sites within these areas. The document has focused on sites most likely to contribute to the delivery of the Core Strategy objectives.

6.7 To ensure the Core Strategy objectives are met, the allocated sites must be available over the next 15 years, realistic and deliverable. In some cases, sites promoted for development by landowners and developers may not be included. The table below documents the assessment of the included sites against Harrow's 16 sustainability objectives.

6.8 The proposed minor modifications would result in the following changes to appraisal of individual sites' performance against sustainability objectives:

- Site R1 Land between High Street and Love Lane: it is proposed to remove the residential component of this site allocation following a review of the extent of the extent of flood risk on this site. As a result the site has no significant effect (down from significant positive) when assessed against sustainability objective 12.
- Site R4 North Harrow Methodist Church: it is proposed to relocate this allocation to the 'other' chapter and to give greater emphasis in the allocation to replacement community development, with retail and housing development as an enabler to that end. As a result the site - new site reference G07 - has a significant positive effect in relation to sustainability objective 14 and minor positive effects (down from significant positive) when assessed against sustainability objectives 12 and 15.
- Site GB3 Harrow College: it is proposed to remove the residential redevelopment component of this allocation and identify the site instead for educational and associated redevelopment, retaining the same Green Belt safeguards. As a result the site has a significant positive effect in relation to sustainability objective 11 and no significant effect (down from significant positive) when assessed against sustainability objective 12.

6.9 The proposed minor modifications also seek the deletion of sites H2, H22 and MOS2. These sites are therefore removed from the appraisal.

6.10 A number of other proposed modifications to this chapter involve revisions to the site details, planning designations or commentary of allocated sites, to achieve corrections, clarifications or amplification following pre-submission consultation. There are also consequential changes to the DPD such as revisions to housing capacity summary tables and Appendix A. These have no material effect upon the performance of the DPD in relation to the sustainability objectives.

Appraisal of Sites included in the Site Allocations DPD

Site No.	Site Description	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	
		Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime	
Retail																		
N/A	North Harrow Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Pinner Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	South Harrow Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Stanmore Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Neighbourhood Parades Designation	++	0	0	0	+	0	0	+	0	++	+	0	+	+	++	+	
N/A	South Harrow Primary Shopping Areas	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Rayners Lane Primary Shopping Area	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Pinner Primary Shopping Area	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
N/A	Stanmore Primary Shopping Area	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+	
R1	Land Between High Street and Love Lane	++	0	0	+	+	0	++	+	0	++	+	0	+	0	++	+	
R2	Units South of Rayners Lane Station	++	0	0	+	+	0	0	+	0	++	+	++	+	0	++	+	
R3	Harrow West Conservative Association	++	0	0	0	0	0	?	+	0	++	+	0	+	0	++	+	
R4	North Harrow Methodist Church																	
R5	Roxth Library and Clinic	++	0	0	0	+	0	0	+	0	++	+	++	+	0	++	+	
R6	Land at the Junction of Kenton Road and Honeypot Lane	++	0	0	0	+	0	0	+	0	++	+	++	+	0	++	+	
R7	Anner Lodge and Stanmore Car Park	++	+	+	0	+	0	0	+	0	++	+	++	+	+	++	+	
MOVED TO 'OTHER' CHAPTER AS PROPOSED MINOR MODIFICATION																		
Employment																		
N/A	Honeypot Lane SIL Proposed Change	++	0	0	0	?	0	0	+	0	++	+	+	+	+	0	0	
N/A	Brember Road Industrial & Business Use Area Proposed Change	++	0	0	0	0	0	0	+	0	++	+	+	+	+	0	0	

	Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime
N/A	Northolt Road Business Use Area Proposed Change	0	0	0	0	0	0	+	0	++	+	+	+	+	0	0
N/A	Harrowian Business Village Business Use Area(new)	0	0	0	0	0	0	+	0	++	+	0	+	0	0	0
EM1	Northolt Road Business Use Area (North and South)	0	0	0	+	0	+	+	0	++	+	++	+	+	+	+
EM2	Rayners Lane Offices, Imperial Drive	0	0	0	+	0	+	+	0	++	+	++	+	+	+	+
EM3	Baillard Mews Estate, Edgware	0	0	++?	+	0	0	+	0	++	+	++	+	+	+	+
EM4	47-49 High Street, Edgware	0	0	?	+	0	+	+	0	++	+	++	+	+	+	+
EM5	57-59 High Street, Edgware	0	0	++?	+	0	0	+	0	++	+	++	+	+	++	+
Housing																
H1	1-5 Sudbury Hill	0	0	0	0	0	0	+	0	0	0	++	+	0	0	0
H2	96-116 Greenford Road	TO BE DELETED AS A PROPOSED MINOR MODIFICATION														
H3	79-89 Greenford Road	0	0	0	0	0	0	+	0	0/-	0	++	+	0	0	0
H4	205-209 Northolt Road	0	0	0	0	0	0	+	0	+	0	++	+	0	0	0
H5	1/1A Silverdale Close	0	0	0	0	0	0	+	0	0	-	++	-	0	0	0
H6	Matrix Public House	0	0	0	0	0	0	+	0	0	0	0	+	+	0	0
H7	The Vaughan Centre	0	-	0	0	0	?	0	0	0	0	++	+	0	0	0
H8	Rayners Public House	0	0	++	0	0	+	0	0	+	0	++	+	0	++	0
H9	Land at Rayners Lane Station	0	0	?	0	0	0	+	0	0	0	++	+	0	0	+
H10	North Harrow Library and Children's Services	0	0	0	0	0	0	+	0	+	+	++	+	0	++	+
H11	Enterprise House	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0
H12	R/O 57-65 Bridge Street	0	0	?	0	0	0	0	0	+	0	++	0	0	+	0
H13	Jubilee House	0	0	0	0	0	0	0	0	+	0	++	+	0	0	0
H14	Land at Stanmore Station	0	+	0	0	0	0	0	0	0	0	++	+	0	0	0
H15	Paxfold, Stanmore	+	0	0	0	0	0	0	0	0	0	0	++	0	0	0
H16	Gillian House	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0

	Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime	
H17	Wolstenholme, Stanmore	++	0	0	0	0	0	0	0	0	0	0	++	++	0	0	
H18	Edgware Town Football Club	++	-/+	0	-	0	-	0	0	0	0	++	+	0	0	0	
H19	Hills Yard and Lockup Garages	++	0	0	0	0	0	0	0	0/-	0	++	+	0	0	0	
H20	19 Buckingham Road	++	0	0	0	0	0	0	0	0	0	++	+	0	0	0	
H21	Canons Park Station Car Park	++	0	0	0	0	0	0	0	0	0	++	0	0	0	+	
H22	5-11 Manor Road																
TO BE DELETED AS A PROPOSED MINOR MODIFICATION																	
H23	Former Tynholme Nursery	++	0	0	0	0	0	0	0	+	0	++	+	0	0	0	
H24	16 - 24 Lowlands Road	++	0	0/?	0	0	0	0	0	0	0	++	+	0	0	0	
Major Developed Sites in Green Belt																	
GB1	RAF Bentley Priory	+	++	++	0	0	0	0	0	+	+	++	0	0	0	0	
GB2	Royal National Orthopaedic Hospital	+	++	++	0	0	0	0	0	++	++	++	+	++	0	0	
GB3	Harrow College, Brookshill Way	+	++	++	0	0	0	0	0	0	++	0	0	0	0	0	
GB4	Wood Farm, Stanmore	+	++	++	0	0	0	0	0	0	0	++	0	++	0	0	
Open Space																	
MOS1	Land at Brigade Close	+	++	+	++	0	++	0	0	0	0	0	+	+	0	0	
MOS2	Land Rear of 121 -255 Pinner Road																
TO BE DELETED AS A PROPOSED MINOR MODIFICATION																	
MOS3	Harrow Weald Park	0	++	++	0	0	++	0	0	0	0	0	+	+	0	0	
MOS4	Glenholme, Common Road	0	++	++	0	0	++	0	0	0	0	0	+	+	0	0	
MOS5	The Santway	0	++	++	0	0	++	0	0	0	0	0	+	+	0	0	
MOS6	Prince Edward Playing Fields	+	++	+	0	0	++	0	0	+	+	0	+	+	0	0	
MOS7	Whitchurch Playing Fields	+	++	+	0	0	++	0	0	+	+	0	+	+	0	0	
OS01 - OS71	Minor Open Space Designations (Amenity Green Space, Green Corridors, Verges)	?	++	++	0	+	++	0	0	0	0	0	+	+	0	0	
Biodiversity																	
BD1 - BD39	Local Wildlife Sites (SINCS) New and Amended Sites	0	++	++	0	+	++	0	0	0	0	0	+	+	0	0	

	Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime
Other Sites																
G01	+	+	+/-	++	0	0	0	0	0	++	++	0	++	+	0	0
G02	++	0	0	0	+	0	0	+	0	+	+	0	++	++	0	0
G03	+	++/-	0	+	0	0	0	0	0	0	0	++	+	+	0	+
G04	++	0	0	++	0	0	++	+	0	++	++	0	+	+	0	+
G05	0	-	0	0	0	0	0	0	0	0	0	++	+	0	0	0
G06	+	++/?	?	++	0	0	0	0	0	0	0	++	+	+	0	+
G07	++	0	0	0	+	0	0	+	0	++	+	+	++	0	+	+

6.11 The findings from the assessment show that the combined impact of the Site Allocations DPD overall had a positive impact when assessed against Harrow's 16 sustainability objectives. The individual objectives had a varying degree of performance both positive, negative and neutral. The performance of these individual objectives generally correlates with the appraisal of the site allocations approach (see above). Individual sustainability objectives that have not performed so well highlight areas where the Council can develop mitigation measures, and these have been incorporated into the Site Allocations DPD, or through policies in the Core Strategy and Development Management DPD.

Evaluating the effects of the Site Allocations DPD

6.12 The appraisal summarised above indicate predominantly positive impacts arising from the site allocations approach and the sites which have been selected for inclusion in the document. This can be attributed to the Site Allocation DPD's relationship with the Core Strategy, the preparation of which has also been informed by higher-level sustainability appraisal. The site-specific elements of the appraisal are based on the approach set out for each of the sites, but is limited by the general nature of these uses, especially open space sites, that have sought to avoid being overly prescriptive. Therefore, sustainability issues such as the detailed design of developments and their environmental performance has not been considered as this is beyond the scope of the Site Allocations DPD, even though such aspects may have a significant bearing on the eventual sustainability outcomes of individual developments. These issues would be considered following submission of individual planning applications and assessed against the core policies of the Core Strategy and through the Development Management DPD.

6.13 Monitoring of the DPDs will enable the Council to ensure that the DPD is effective post-adoption. In particular, this monitoring will enable any unintended consequences (including those related to sustainability objectives) to be identified early in the life of the plan and for action of contingencies to be employed to mitigate these consequences.

Mitigation Measures

6.14 The purpose of the sustainability appraisal is not to make the decisions about which sites are excluded or included, but to take a systematic approach to the assessment of potential impacts. Where possible constraints and negative impacts are identified, it provides the opportunity to consider how these might be mitigated. While some of the sites have been identified as having potential negative impacts in relation to particular objectives, this does not mean that overall the allocation of these sites is 'unsustainable'.

6.15 In many cases measures will be implemented to mitigate potential adverse outcomes and these are addressed through the development management process. An example of this is where a site is in proximity to a listed building. This would not prevent approval of a development proposal provided any such proposal was designed sensitively to avoid adverse effects (or to maximise any enhancement benefit) on that building's setting or character.

Omitted Sites

6.16 The following sites have been appraised, but were omitted from the final DPD for a number of reasons including inconsistency with the Borough's Spatial Strategy, not purely on Sustainability grounds.

Site No.	Site Description	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16	
		Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Affordable Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime	
Retail																		
N/A	Pheonix Industrial Estate*	++	0	0	0	+	++	+	+	0	--	-	++	--	+	0	+	
N/A	Royal Mail Depot, Elingrove Road	++	0	0	0	0	0	0	+	0	-	-	++	0	+	0	0	
N/A	Old Lyonians Sports Ground	++	--	--	-	-	0	-/?	+	0	0	0	++	0	-	0	0	
N/A	Clamp Hill Nurseries	++	--	--	-	-	0	-/?	+	0	0	0/-	++	0/-	-	0	0	
N/A	Barratt Way Industrial Estate*	++	0	0	0	+	++	+	+	0	--	-	++	--	+	0	+	

* These sites are located within the Harrow and Wealdstone Intensification Area

- The Pheonix Industrial Estate, Barratt Way Industrial Estate and Royal Mail Depot were omitted due to their continued active employment use and in the case of the Industrial Estates being designated as business & industrial use areas and so are inconsistent with a purely residential use. No compelling evidence was presented to support their release from their existing use in terms of the supply/demand balance and any other planning objectives.
- The Clamp Hill Nurseries and Old Lyonians Sports Grounds have been omitted as they are within Green Belt/Metropolitan Open Land respectively and their allocation for development would not achieve any benefit of strategic significance to the Borough. Their allocation for development would therefore be contrary to Core Strategy policy and the Borough's spatial strategy for managing growth. There were no compelling enabling or other material arguments put forward that would override this position.

Appraisal of Area Action Plan for Harrow and Wealdstone DPD

Harrow & Wealdstone Intensification Area and the Harrow & Wealdstone Area Action Plan

7.1 Opportunity Areas and Areas for Intensification are identified in the London Plan as locations with capacity for housing and employment growth on previously-developed land. The principal distinction between an Opportunity Area and an Area for Intensification concerns the quantum of capacity for growth; opportunity areas represent more strategic growth opportunities and areas for intensification relate to areas of more locally significant growth.

7.2 Harrow & Wealdstone is included in the London Plan 2011 as a new Area for Intensification with an indicative employment and housing capacities of 2,500 jobs and at least 1,500 homes respectively. The designation has been carried forward through into Harrow's Core Strategy. This gives definition to the extent of the new Intensification Area, which includes Harrow town centre, Wealdstone district centre, the Station Road 'corridor' which links the two centres and land adjoining the two centres, including existing areas of residential development, employment use and open space. The Core Strategy identifies the strategic objectives for the Intensification Area to deliver at least 3,000 jobs and 2,800 new homes.

7.3 The Plan will be a 'development plan document' within Harrow's Local Plan, which means that it will be the primary consideration in the determination of planning applications for development within the Intensification Area when it is adopted. The Plan will include policies against which planning applications will be assessed and the allocation of sites for development or other uses.

Summary of Spatial Development Strategy

7.4 The Area Action Plan is at an advanced stage of preparation. It focuses on a spatial development strategy that has resulted from two earlier consultations, one on four preliminary options followed by a consultation on a preferred option, to demonstrate the way in which the component parts of the Intensification Area can be developed, and the implications of this for the realisation of the Area's capacity in terms of the number of homes, the housing mix, the number of jobs and employment sectors.

Sustainability Appraisal of Area Action Plan Spatial Development Strategy

7.5 The spatial strategy has been assessed against the 16 sustainability objectives that have been established in Harrow's Local Development Framework Sustainability Appraisal Scoping Report (2006). The assessment has been carried out by Council officers and the following scoring symbols are used in the tables below to identify positive and/or negative effects. Given the strategic nature of the spatial development strategy a 'high level' assessment has been carried out for the spatial strategy, and a more detailed assessment has been carried out for the development management policies and site allocations contained in the AAP.

Key to Symbols Used in the Appraisal

Symbol	Meaning
++	Significant Positive Effect on Sustainability Objective (normally direct)
+	Minor Positive Effect on Sustainability Objective (normally indirect)
0	No Significant Effect on Sustainability Objective
-	Minor Negative Effect on Sustainability Objective (normally indirect)
--	Significant Negative Effect on Sustainability Objective (normally direct)
?	Uncertain Effect on Sustainability Objective

Spatial Strategy

Assessment of the AAP Spatial Strategy

Sustainability Objective	Score	Justification
S01 To make the most efficient use of land and buildings	++	This strategy would generate total outputs of a minimum of 2,965 homes and 3,380 jobs with delivery distributed between Harrow town centre, Wealdstone and Station Road. The total outputs would exceed the Core Strategy objectives to generate 3,000 jobs and 2,800 new homes within the Harrow & Wealdstone Intensification Area, and therefore represents a highly efficient use of land particularly within the town centres.
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+/-	By exceeding minimum housing and job targets for the Area, the strategy could generate additional funding and direct opportunities for provision and enhancement of open space. It would also contribute to the Borough's overall housing delivery on previously-developed land, thereby mitigating any demand to release open space for development. However the additional growth risks increased recreational pressure upon open spaces serving the Intensification Area which could lead to qualitative deterioration.
S03 To conserve and enhance biodiversity in the Borough	+/-	By exceeding minimum housing and job targets for the Area, the strategy could generate additional opportunities for provision and enhancement of biodiversity in this area of access to nature deficiency. It would also contribute to the Borough's overall housing delivery on previously-developed land, thereby mitigating any demand to release open space (which supports biodiversity) for development. However the additional growth risks increased recreational pressure upon open spaces (which support biodiversity) serving the Intensification Area.

Sustainability Objective	Score	Justification
<p>S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features</p>	<p>++</p>	<p>The strategy would give effect to the broader spatial strategy for the Borough, set out in the Core Strategy, by delivering development growth in a location of relatively low heritage asset concentration.</p> <p>This strategy would ensure separate, distinct identities for Harrow town centre and Wealdstone and use development to secure public realm improvement in Station Road. Development in Harrow town centre would be delivered in blocks of flats of a variety of appropriate densities; however the number of flats to be delivered in higher-density blocks could be detrimental to historic buildings within Harrow town centre and to the setting of Harrow on the Hill, this is mitigated against through the introduction of new viewing corridors as a result of a Views Assessment, including height limits, and this is set out in policy.</p>
<p>S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)</p>	<p>++/--</p>	<p>This strategy requires public realm improvements in each of the sub areas, with improvements in Station Road to focus upon sustainable movement between the two town centres (to include congestion reduction at a critical road junction). In so doing, it would contribute to the reduction of vehicle emissions and give preference to more sustainable modes of transport within the sub areas of the Intensification Area. However there are potential negative consequences for air quality if congestion reduction increases the attractiveness of Station Road to motorists, and associated with concentrated development activity over the plan period within the Intensification Area.</p>
<p>S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated</p>	<p>+</p>	<p>Other than enabling the redevelopment (and by association decontamination) of the former Kodak factory site, the strategy would have no significant effect upon the reduction of contaminated land. However it may have a slight positive effect if other industrial land comes forward for enabling residential development, and so some land decontamination may be necessary.</p>
<p>S07 To improve water quality and reduce the risk and impact of flooding</p>	<p>--/+</p>	<p>This strategy would result in high levels of development throughout the Intensification Area. In so doing, it would spread development to areas of higher as well as lower flood probability throughout the Intensification Area. However it would also enable opportunities through new development to achieve investment in sustainable flood management/greenfield run-off rates and contribute to overall flood risk reduction in Wealdstone. Without such development it is unlikely that any such improvements to</p>

Sustainability Objective	Score	Justification
		surface water flood risk in Wealdstone could be achieved, nor that infrastructure improvements to address fluvial flooding from the Wealdstone Brook could be funded within the life of the plan.
S08 To promote development that ensures the sustainable use of energy	++	By exceeding minimum housing and job targets for the Area, the strategy would increase the potential feasibility in Harrow town centre, Wealdstone and Station Road of a district-wide combined heat and power network that would contribute to the sustainable supply of energy. High levels of redevelopment would also contribute to the replacement of existing buildings with new development to current standards of energy efficiency.
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	The strategy would have no significant effect upon the reduction of waste and waste management.
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	The strategy would deliver sufficient development to generate at least 2,965 jobs, and the high level of housing growth throughout the Area would support existing shops and businesses within Harrow town centre, Wealdstone district centre and Station Road. Economic output indicates high job creation in retail/leisure and office sectors, and modest growth also community and industrial sectors.
S11 To improve the education and skills of the Borough	+/-	Depending upon phasing, however, high levels of growth risk increasing the pressure upon available places at schools serving the Intensification Area. However, by exceeding minimum housing and job targets for the Area, the strategy will generate additional opportunities to secure the provision of a new primary and secondary school, as identified in the Harrow Core Strategy.
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	++	The strategy would deliver housing growth which, together with pipeline supply and the Site allocations DPD, would meet and exceed the Core Strategy target for the plan period. Together with London Plan and Core Strategy policies, this housing delivery would also ensure the delivery of the maximum reasonable delivery of affordable housing. The delivery of a high number of traditional family homes in Wealdstone and in moderate density blocks of flats in Station Road would help to meet housing need in these locations.
S13 To reduce social exclusion and facilitate the	++	By exceeding minimum housing and job targets for the Area, and with the provision of affordable housing as part

Sustainability Objective	Score	Justification
development of mixed and balanced communities		of overall delivery, the strategy would maximise opportunities for people to access local employment and housing. The delivery of a high number of traditional family homes in Wealdstone and in moderate density blocks of flats in Station Road would help to meet housing need in these locations. By distributing growth to three sub areas, the DPD would also promote integration with existing resident communities.
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	++/+	The strategy requires public realm improvements in each of the sub areas, with improvements in Station Road to focus upon sustainable movement between the two town centres (to include congestion reduction at critical road junctions). In so doing, it would promote more active lifestyles and contribute to the mitigation of adverse health effects associated with poor air quality. Access to housing, employment and open space are all determinants of health and wellbeing, and in these regards the strategy also has a potential indirect positive effect.
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	++	The strategy would deliver sufficient development to generate at least 2,965 jobs and 3,380 homes, which would support existing shops and businesses within Harrow town centre, Wealdstone district centre and Station Road.
S16 To reduce crime, fear of crime and anti-social activity	+	The strategy would spread growth to all sub areas within the Intensification Area and, in so doing, secure increased natural surveillance of the whole of the Area. By increasing access to homes (including affordable homes), job opportunities, infrastructure and services, the strategy will also help to prevent crime.

7.6 The strategy generates strong, positive economic and town centre outcomes associated with development in Harrow town centre and Wealdstone, and would help to secure the more sustainable use of energy. By utilising Station Road's capacity to secure a mix of residential densities throughout the Intensification Area as a whole, the appraisal also reveals positive effects in relation to housing and social exclusion objectives. Health and air quality outcomes are also generally positive, although congestion reduction along Station Road could undermine the air quality benefits to this part of the Intensification Area as well as the short term impact of concentrated construction activity within the relatively dense, urban area.

7.7 The strategy performs well in terms of land and building use efficiency. This reflects the higher level sustainability appraisal of the Core Strategy and the objectives it set for the Intensification Area to deliver at least 3,000 jobs and 2,800 homes, both of which are met and exceeded by the strategy.

7.8 For the purposes of assessing the strategy against objective 2 it is assumed that the development of the Intensification Area would not involve any net loss of open space (in accordance with the London Plan and Harrow's Core Strategy) and, therefore, consideration of effects upon open space has been confined to the potential of growth to create recreational pressure and support qualitative/quantitative improvements. On this basis the strategy only has indirect positive and negative effects in relation to the open space objective. A similar approach is adopted in respect of objective 3 (biodiversity).

7.9 The principal effects of the strategy in relation to objective 4 concern the potential to impact upon the setting of Harrow on the Hill and the character of the areas within/adjoining the Intensification Area, including protected views.

7.10 Assessment of the strategy against objective 5 is largely dependant upon the ability to secure increased walking and cycling, and better public transport conditions, through public realm improvements. The strategy demonstrates a mixed performance of positive and negative outcomes.

7.11 The objectives relating to contaminated land and waste were assessed in the Core Strategy's sustainability appraisal, and were therefore considered as part of the Intensification Area's designation; the strategy proposed for the Area Action Plan would not have any significant effect on these two objectives.

7.12 In relation to objective 7 the main implications of the strategy are the direction it gives to develop in Wealdstone and the implications of this for flood risk management and the ability of redevelopment to deliver improvements in sustainable drainage systems & infrastructure. Performance against this objective in Wealdstone is poor in the existing/baseline situation, and by supporting the redevelopment of this existing highly urbanised/impermeable area the strategy will have a positive effect of helping to secure greenfield run off rates and reduce flood risk overall.

7.13 A Core Strategy policy provision for the Intensification Area is to support the installation of a district-wide combined heat and power network for the Area, where feasible. To this end the strategy performs well against objective 8.

7.14 The strategy produces positive employment outputs and therefore performs well against objective 10.

7.15 For the purposes of objective 11, the principal implications of the Intensification Area are the potential for growth to support the provision of new schools (identified components of supporting infrastructure in the Core Strategy) and the possible short term consequences of development on pupil places within existing schools serving the Area. The strategy has indirect positive and negative effects in these regards, but the eventual outcome will be positive.

7.16 In terms of housing delivery the strategy exceeds the Core Strategy minimum delivery target for the Intensification Area, and therefore performs well against objective 12 in this regard. The strategy performs particularly well by delivering a mix of housing throughout the Intensification Area which includes a high component of traditional family housing in Wealdstone. The assessment assumes that all of the options will deliver affordable housing in accordance with Core Strategy overarching Policy CS1.

7.17 Assessment of the strategy against objective 13 is directly comparable to that for housing (objective 12) above. In particular, the provision of jobs and services in an area with a high incidence of multiple deprivation and high public transport accessibility is likely to lead to positive outcomes.

7.18 In relation to objective 14, the strategy generates direct and indirect positive effects as a consequence of their more widespread public realm improvements which would encourage walking and cycling throughout the Intensification Area, and the generally beneficial air quality outcomes associated with this. Access to housing, employment and open space are all indirect determinants of the performance of the strategy.

7.19 The strategy achieves positive scores in relation to objective 15 as it would provide a very strong stimulus for the regeneration of Harrow town centre and Wealdstone town centre.

7.20 Assessment in relation to objective 16 is determined by the extent to which the strategy would increase activity and natural surveillance throughout the Intensification Area. More generally, the strategy would help to ensure the delivery of homes, jobs and services which help to prevent crime. This results in an indirect positive effect overall.

Maximisation Opportunities and Minimisation Possibilities

7.21 The strategy has produced many positive effects and a few negative effects, together with a small number of no significant effects, when assessed against Harrow's 16 sustainability objectives. This reflects the development of the AAP through the issues and options and preferred option consultation stages, having regard to the responses received, the findings of the sustainability appraisal of those versions of the document, and other considerations. The policies of the AAP have been developed to maximise the positive effects of the strategy and to mitigate potential adverse effects. Monitoring of the AAP will help to ensure that any adverse or unintended consequences are identified early on during the plan's implementation, and for contingency or other actions to be implemented to address these.

Appraisal of Preferred Option AAP Policies

7.22 Each policy contained in the AAP, which will help deliver the strategy appraised above, has also been appraised, to identify positive and negative effects. This process has informed the development of the AAP to make the policies as sustainable as possible. The same appraisal process and scoring system used above is taken forward for this appraisal.

7.23 Minor modifications are proposed in respect of Policies AAP1, AAP3, AAP4, AAP6, AAP8, AAP17, AAP19 and AAP21, as well as to the parts of the reasoned justification in this chapter. However all of the changes provide only clarification/amplification and do no materially affect the performance of the AAP policies against the sustainability objectives.

Development in Harrow, Station Road and Wealdstone

Sustainability Objective	Policy 1	Policy 2	Policy 3
S01 To make the most efficient use of land and buildings	++	++	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	+

Sustainability Objective	Policy 1	Policy 2	Policy 3
S03 To conserve and enhance biodiversity in the Borough	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++/-	+	+
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	+
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	+	++
S11 To improve the education and skills of the Borough	0	0	+
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	+
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	++	+	++
S16 To reduce crime, fear of crime and anti-social activity	+	+	++

7.24 The policies for each of the three main areas in the AAP (Wealdstone, Harrow Town Centre and Station Road) score well in ensuring that land is used efficiently, and in helping improve Harrow's town centres and economy. They will also help to ensure affordable housing is delivered, and that the social wellbeing of residents is improved through the planning process.

Character and Amenity

Sustainability Objective	Policy 4	Policy 5	Policy 6	Policy 7
S01 To make the most efficient use of land and buildings	++	++	++	+
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	+	+	+	+
S03 To conserve and enhance biodiversity in the Borough	+	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++	+	++	++
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	0	0	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	0	0
S07 To improve water quality and reduce the risk and impact of flooding	+	0	0	0
S08 To promote development that ensures the sustainable use of energy	++	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	+	+	0
S11 To improve the education and skills of the Borough	0	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	0	0	+
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+	0	0	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	+	+	+	+

Sustainability Objective	Policy 4	Policy 5	Policy 6	Policy 7
S16 To reduce crime, fear of crime and anti-social activity	++	+	+	+

7.25 The policies within this chapter score particularly well in ensuring proposals are controlled in a manner where they would not result in a negative effect on the landscape and streetscape of the surrounding area, in conjunction with the signposted Development Management Policies. Policy AAP4 which seeks a high standard of development throughout the Intensification Area meets the majority of the sustainability objectives as it covers a variety of design considerations that would need to be accounted for in proposals for development.

7.26 Policy AAP 6 on Development Height responds positively to a number of sustainability objectives, to help keep particular views of the Borough 'open'. Policy AAP 7, which relates to the public realm similarly scores well (indirectly) on a number of objectives relating to the environment and social well being, as the creation of new, or improved public realm can aid in improving the environment, and create places for people to enjoy and utilise for a range of activities.

Conservation and Heritage

Sustainability Objective	Policy 8
S01 To make the most efficient use of land and buildings	+
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0
S03 To conserve and enhance biodiversity in the Borough	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	++
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0
S07 To improve water quality and reduce the risk and impact of flooding	0
S08 To promote development that ensures the sustainable use of energy	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0
S11 To improve the education and skills of the Borough	0

Sustainability Objective	Policy 8
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0
S16 To reduce crime, fear of crime and anti-social activity	0

7.27 This policy has an obvious direct positive effect on conserving and enhancing the Borough's heritage. It also has an indirect positive effect on open space, the use of land and buildings, and the economy, through enhancing the setting of open spaces, preserving notable buildings throughout the Borough, enabling residents and visitors to see these buildings without having to travel large distances, and by encouraging tourists to visit, thus boosting the economy.

Environmental Sustainability

Sustainability Objective	Policy 9	Policy 10
S01 To make the most efficient use of land and buildings	0/-	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0	++/-
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	++	0
S07 To improve water quality and reduce the risk and impact of flooding	++	0
S08 To promote development that ensures the sustainable use of energy	0	++
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	+

Sustainability Objective	Policy 9	Policy 10
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	+
S11 To improve the education and skills of the Borough	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0	0
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	0	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0
S16 To reduce crime, fear of crime and anti-social activity	0	0

7.28 The environment policies are in place to ensure proposals have regard to the potential impact that development may have on it. They seek to protect and enhance the natural environment that is beneficial to all, including humans, animals and flora and fauna. The policies meet the sustainability objectives that relate to the safeguarding and promotion of the natural environment. This includes flooding, water quality and pollution.

Open Space and the Natural Environment

Sustainability Objective	Policy 11	Policy 12
S01 To make the most efficient use of land and buildings	+	0
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	++	+
S03 To conserve and enhance biodiversity in the Borough	+	++
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	+	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0
S07 To improve water quality and reduce the risk and impact of flooding	+	+

Sustainability Objective	Policy 11	Policy 12
S08 To promote development that ensures the sustainable use of energy	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0	0
S11 To improve the education and skills of the Borough	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	0
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0	0
S16 To reduce crime, fear of crime and anti-social activity	+	0

7.29 These policies meet the first four sustainability objectives particularly well by concentrating proposals on appropriate land and protecting the open spaces and improving biodiversity within the Borough as well as ensuring development does not negatively affect landscapes. Other positive effects include improvements to air quality and water quality and reducing the risk and impact of flooding through natural drainage to these open spaces. The policies also provide positives to health and wellbeing through enhancing the quality of life through the provision of open spaces and access to nature.

Housing

Sustainability Objective	Policy 13
S01 To make the most efficient use of land and buildings	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	++
S03 To conserve and enhance biodiversity in the Borough	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0

Sustainability Objective	Policy 13
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0
S07 To improve water quality and reduce the risk and impact of flooding	0
S08 To promote development that ensures the sustainable use of energy	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0
S11 To improve the education and skills of the Borough	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	++
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	++
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0
S16 To reduce crime, fear of crime and anti-social activity	+

7.30 The housing policy performs well in relation to sustainability objectives 01, 12, and 13 in particular by making the most efficient use of land and buildings, promoting high density development where appropriate, integrating communities through design and providing affordable housing. Reducing social exclusion may also reduce crime, which contributes to the 16th sustainability objective and housing as part of a mixed use development can also help improve town centres vitality.

Employment and Economic Development

Sustainability Objective	Policy 14	Policy 15	Policy 16
S01 To make the most efficient use of land and buildings	++	++	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0	0

Sustainability Objective	Policy 14	Policy 15	Policy 16
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	+	+	+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	++	+	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0
S08 To promote development that ensures the sustainable use of energy	0	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	++	++
S11 To improve the education and skills of the Borough	+	+	+
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	+
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+	+	+
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	+	++	++
S16 To reduce crime, fear of crime and anti-social activity	+	0	+

7.31 The economic development policies score well against sustainability objectives 01, 10,11 and 15 in promoting a diverse economic sector and improving the education and skills of the Borough. They also improve town centres generally and are considered to reduce crime rates as a high level of activity is assumed particularly within the town centres.

Town Centres and Neighbourhood Parades

Sustainability Objective	Policy 17	Policy 18
S01 To make the most efficient use of land and buildings	++	++

Sustainability Objective	Policy 17	Policy 18
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0
S03 To conserve and enhance biodiversity in the Borough	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	++	++
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0
S07 To improve water quality and reduce the risk and impact of flooding	0	0
S08 To promote development that ensures the sustainable use of energy	0	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	++	++
S11 To improve the education and skills of the Borough	0	+
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	0	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	++	++
S16 To reduce crime, fear of crime and anti-social activity	+	+

7.32 The sustainability objectives concerned with town centres and retail parades score when assessed against the objectives related to this theme. They also provide opportunities to reduce levels of crime in such areas and through job growth in these sectors help reduce social exclusion. By supporting major retail development in town centres, they also help to reduce the need to travel/encourage access to/from these facilities by public transport.

Transport and Waste

Sustainability Objective	Policy 19	Policy 20	Policy 21
S01 To make the most efficient use of land and buildings	0	0	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0	0	+
S03 To conserve and enhance biodiversity in the Borough	0	0	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0	0	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	++	++	?/+
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0	0	+
S07 To improve water quality and reduce the risk and impact of flooding	0	0	0
S08 To promote development that ensures the sustainable use of energy	+	+	+
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0	0	++
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	+	0	+
S11 To improve the education and skills of the Borough	0	0	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0	0	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	+	+	+
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	+	+	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	+	+	0
S16 To reduce crime, fear of crime and anti-social activity	+	0	0

7.33 These policies perform well with regard to air quality management, reducing waste, and improving the vitality of town centres, and reducing social exclusion through improved public transport to key Borough facilities.

Implementation, Resource and Monitoring

Sustainability Objective	Policy 22
S01 To make the most efficient use of land and buildings	++
S02 To protect the quality, quantity and accessibility of open spaces in the Borough	0
S03 To conserve and enhance biodiversity in the Borough	0
S04 To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features	0
S05 To ensure air quality continues to improve through reducing air pollution and address the causes of climate change through reducing emissions of greenhouse gases and other pollutants (including air, water, soil noise, vibration and light)	0
S06 To reduce pollution of land (soil) and ensure that contaminated land is remediated	0
S07 To improve water quality and reduce the risk and impact of flooding	0
S08 To promote development that ensures the sustainable use of energy	0
S09 To discourage the production of waste and promote further the waste hierarchy of minimisation, reuse, recycling and composting	0
S10 To facilitate the development of a dynamic and diverse economic sector which attracts growth	0
S11 To improve the education and skills of the Borough	0
S12 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	0
S13 To reduce social exclusion and facilitate the development of mixed and balanced communities	0
S14 To improve the health and wellbeing of Harrow residents and reduce inequalities in health	0
S15 To improve the competitiveness, vitality, viability and adaptability of town centres in Harrow	0
S16 To reduce crime, fear of crime and anti-social activity	0

7.34 This policy has mainly neutral effects, but could have a direct positive impact upon the efficient use of land through enabling land assembly and ensuring sites within the Intensification Area are developed.

Appraisal of Area Action Plan Site Allocations

7.35 A range of sites have been considered in preparing the AAP. These include sites brought forward as a result of two call for sites exercises conducted in 2009 and 2010, as well as strategic housing sites identified in Harrow's Annual Monitoring Report housing trajectory which is informed by a Strategic Housing Land Availability Assessment and Strategic Housing Market Assessment. Other sites have been identified through consultation with partner organisations and the Council (as landowner).

7.36 In selecting sites for inclusion in the DPD, a number criteria were used. These include: size; deliverability; existing designated uses and environmental constraints. Major sites selected for allocation are usually suitable for developments of over 10 dwellings, often as part of mixed use schemes. The document has focused on sites most likely to contribute to the delivery of the Core Strategy objectives and the AAP spatial strategy.

7.37 To ensure the Core Strategy objectives are met, the allocated sites must be available for development over the next 15 years, realistic and deliverable. In some cases, sites promoted for development by landowners and developers may not be included. The table below documents the assessment of the included sites against Harrow's 16 sustainability objectives.

7.38 Minor modifications are proposed in respect of Sites 2, 4, 5, 11, 13, 16, 18 and 19. However all of the changes provide only clarification/amplification and do not materially affect the performance of the AAP site allocations against the sustainability objectives.

Site no	Site Description	SO1	Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation	Economic Growth	Improve Education and Skills	Affordable Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime
		SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16		
01	Headstone Manor and Environs	++	++	++/?	0	0	+	0	0	+	+	0	0	0	0	+	0	0
02	Kodak and Zoom Leisure	++	+	+	0	++	+	+	0	++	++	++	++	+	++	+	+/-	+
03	Teachers Centre	++	0	0	+	0	+	+	0	+	++	0	++	+	++	+	0	0
04	Col Art	++	0	0	0	++	+	+	0	++	++	++	+	++	+	0	0	0
05	Wealdstone Infills	++	0	++/?	+	0	++	0	0	++	+	++	+	++	+	0	++	+
06	Palmerstone Road/George Gange Way	++	0	0	0	++	++	0	0	++	++	+/?	++	0	++	0	++	+
07	Harrow Leisure Centre	++	+	0	+	0	++	++	0	0	0	++	++	++	++	++	0	+
08	CA and Civic Amenity and Council Depot	++	0	0	?	+	0	+/?	++	++	0	0	0/+	0	0	0	0	0
09	Civic Centre	++	0	0	0	0	0/+	+	0	++	+	++	++	++	++	+	0	+
10	High Road Opportunity Area	++	0	++/?	+	0	+	0	0	++	0	++	+	++	+	0	0	+
11	Tescos	++	0	0	0	0	0	+	0	++	+	++	0	++	0	0	++	+
12	Greenhill Way Carpark North	++	0	0	0	0	0	0	0	+	0	++	0	++	0	0	++	0
13	Greenhill Way car park and Debenhams	++	0	0	-/?	0	0	+	0	++	+	++	+	++	+	0	++	+
14	Neptune Point	++	0	0	+	++	0	++	0	++	+	++	+	++	+	0	++	+
15	Bradstowe House	++	0	0	0	0	0	0	0	++	+	++	0	++	0	0	++	+
16	College Road West	++	0	0	0	0	0	0	0	++	0	++	+	++	0	0	++	+
17	Havelock Place	++	+	0	0	0	0	0	0	++	0	++	+	++	0	0	++	+
18	51 College Road	++	0	++/?	0	0	0	+	0	++	++	++	++	++	++	0	++	+
19	Harrow on the Hill Car Park West	++	+	++/?	0	0	0	0	0	++	0	++	0	++	0	0	++	+
20	Lowlands Recreation Ground	++	++	++	++	0	+	0	0	+	0	++	+	++	+	+	+	0
21	Harrow on the Hill Car Park	++	0	0	0	0	0	0	0	++	++	0	++	++	++	+/?	+	+
22	Lyon Road	++	++	0	0	0	0	+	0	++	+	++	+	++	+	+	++	+
23	Gayton Road	++	++	++/?	0	0	0	+	0	++	+	++	+	++	=	0	++	+

Appraisal of AAP Designations

Designation	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16
	Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation	Economic Growth	Improve Education and Skills	Affordable Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime
Harrow Town Centre Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+
Wealdstone Revised Frontages	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+
Harrow Primary Shopping Area	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+
Wealdstone Primary Shopping Area	++	0	0	0	+	0	0	+	0	++	+	0	+	0	++	+
Station Road Neighbourhood Parade	++	0	0	0	++	0	0	++	0	++	+	0	+	+	++	+
Wealdstone SIL Consolidation	++	0	0	0	?	?	0	+	0	++	+	0	+	+	0	0
Additional Business Use Area	++	0	0	0	0	0	0	+	0	++	+	0	+	+	+	0

7.39 The findings from the assessment show that the impacts of the Area Action Plan site allocations overall have a positive impact when assessed against Harrow's 16 sustainability objectives. The individual objectives had a varying degree of performance both positive, negative and neutral, but overall the development of the Intensification Area (facilitated by the site allocations) performs well in relation to the sustainability objectives. The policies of the AAP and (where signposted as relevant in the AAP) of the Development Management Policies DPD will be applied through the development management process to ensure that the positive benefits of development on allocated sites are maximised and to mitigate the potential negative impacts of their development. Monitoring of the AAP and other DPD's implementation will enable any adverse or unintended consequences to be identified early on in the plans' implementation, and for contingency or other actions to be deployed to mitigate those consequences.

Evaluating the effects of the AAP Site Allocations and Designations

7.40 The appraisal summarised above indicate predominantly positive impacts arising from the site allocations approach and the sites which have been selected for inclusion in the document. This can be attributed to the AAP DPD's relationship with the Core Strategy, the preparation of which has also been informed by higher-level sustainability appraisal. The site-specific elements of the appraisal are based on the approach set out for each of the sites, but is limited by the general nature of these uses, especially open space sites, that have sought to avoid being overly prescriptive.

7.41 For the purposes of development design and use, it is assumed that proposals will come forward for the allocated sites which comply with national planning policy, the London Plan, the Core Strategy and the relevant AAP/DPD policies. The degree to which a site's development meets polices requirements would be considered following submission of individual planning applications.

Mitigation Measures

7.42 The purpose of the sustainability appraisal is to inform but not to make the decisions about which sites are excluded or included, but to take a systematic approach to the assessment of potential impacts. Where possible constraints and negative impacts are identified, it provides the opportunity to consider how these might be mitigated. While some of the sites have been identified as having potential negative impacts in relation to particular objectives, this does not mean that overall the allocation of these sites is 'unsustainable'.

7.43 In many cases measures could be implemented to mitigate potential adverse outcomes and these can be addressed through the development management process. An example of this might be where a site is in proximity to a listed building. This would not prevent approval of a development proposal provided any such proposal was designed sensitively to avoid adverse effects on that building's setting or character.

Omitted Sites

7.44 The following sites have been appraised, but were omitted from the final DPD for a number of reasons including inconsistency with the Borough's Spatial Strategy, not purely on sustainability grounds.

Site No.	Site Description	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16
		Efficient Use of Land and Buildings	Open Space	Biodiversity	Historic Landscape	Air Quality	Reduce Pollution of Land	Water Quality and Flooding	Sustainable Energy Use	Waste Minimisation and Recycling	Economic Growth	Improve Education and Skills	Affordable Housing	Reduce Social Exclusion	Improve Health	Town Centre Vitality	Reduce Crime
Retail																	
N/A	Wealdstone Police Station	++	0	0	?	0	0	-/?	-/?	0	+	+	++	0	0	++	-
N/A	Harrow Magistrates Court	++	0	0	?	0	0	-/?	-/?	0	0	0	++	0	0	0	-
N/A	Plantation Garden Centre	++	--	--	--	-	0	0	+	0	0	0	++	0	-	0	0
N/A	Wickes House	++	0	0	0	0	0	0	+	0	-/?	-/?	++	+	0	+	+

- Wealdstone Police Station was omitted as it is in current active use, and there was no evidence submitted as to the Police's future estates strategy for the Borough. Therefore it would be inappropriate to allocate a site that fulfills an essential public infrastructure role without knowing how its loss would be managed in terms of service provision. Furthermore, the building is listed and therefore the principle of any re-use of the premises would be highly dependent upon their impact on the significance of this heritage asset. In view of the building's listed status there may also be limited scope to achieve appropriate levels of flood risk mitigation/reduction.
- Harrow Magistrates court was omitted for the same reasons as Wealdstone Police Station, in that there was no evidence submitted about future court facilities in the Borough. Furthermore, the building is listed and therefore the principle of any re-use of the premises would be highly dependent upon their impact on the significance of this heritage asset. In view of the building's listed status there may also be limited scope to achieve appropriate levels of flood risk mitigation/reduction.
- Wickes House was omitted due to its continued active employment use and the lack of any evidence of the occupiers intention to vacate the premises. No compelling evidence was presented to support the site's release from its existing use in terms of the supply/demand balance of office space and any other planning objectives.
- The Plantation Garden Centre has been omitted as the allocation of Metropolitan Open Land for development would not achieve any benefit of strategic significance to the Borough. Its allocation for development would therefore be contrary to Core Strategy policy and

the Borough's spatial strategy for managing growth. There were no compelling enabling or other material arguments put forward that would override this position.

Report Title	Date	Status
Regional Policies - GLA		
The London Plan 2011	2011	Adopted
Rethinking Rubbish in London: The Municipal Waste Management Strategy	2003	Adopted
Cleaning London's Air: The Mayor's Air Quality Strategy	2002	Adopted
Sounder City: The Mayor's Ambient Noise Strategy	2004	Adopted
The Mayor's Transport Strategy	2010	Adopted
2009 London Housing Capacity Study	2009	Adopted
Greener London: The Mayor's State of the Environment Report for London	2007	Adopted
Greater London Housing Requirements Study	2004	Adopted
Green Light to Clean Power: The Mayor's Energy Strategy	2003	Adopted
Connecting with London's Nature: The Mayor's Biodiversity Strategy	2002	Adopted
SPG - Providing for Children and Young People's Play and Informal Recreation	2008	Adopted
Outer London: Issues for the London Plan	2007	Adopted
London Office Policy Review 2009	2009	Adopted
London Wholesale Markets Review	2007	Adopted
North East and South East London Industrial Land Baseline	2007	Adopted
Improving Londoners' Access to Nature	2008	Adopted
SPG - Sustainable Design and Construction	2006	Adopted
Sustainability Checklist for London	2006	Adopted

National Policy			
National Planning Policy Framework		2012	Adopted

Local Development Framework Documents

Report	Date	Status
Statement of Community Involvement	August 2006	Adopted
Local Development Scheme (LDS) (replaced 2009 version)	July 2012	Adopted
Annual Monitoring Report (1 April 2004 to 31 March 2005)	December 2005	completed
Annual Monitoring Report (1 April 2005 to 31 March 2006)	December 2006	completed
Annual Monitoring Report (1 April 2006 to 31 March 2007)	December 2007	completed
Annual Monitoring Report (1 April 2007 to 31 March 2008)	December 2008	completed
Annual Monitoring Report (1 April 2008 to 31 March 2009)	December 2009	completed
Annual Monitoring Report (1 April 2009 to 31 March 2010)	December 2010	completed
Sustainable Community Plan for Harrow 2006-2020	November 2006	Adopted
Guide to the Local Development Framework	September 2006	completed
Core Strategy Issues and Options Report preliminary issues and options consultation paper (part 1 and 2)	September 2006	completed
Delivering Development in Harrow - Site Specific Proposals DPD preliminary issues and options consultation paper	September 2006	completed
Core Strategy Strategic Options for the Future Development of Harrow 2nd stage preliminary issues and options consultation paper	January 2007	completed
Sustainability Appraisal of Strategic Options paper (4 parts)	December 2006	completed
Core Strategy Draft Preferred Options	June 2008	completed
Sustainability Appraisal of Draft Preferred Options	July 2008	completed
Core Strategy Preferred Option	Nov 2009	completed

Report	Date	Status
Sustainability Appraisal of Preferred Option	Nov 2009	completed
Core Strategy Submission document	May 2011	completed
Core Strategy DPD	February 2012	Adopted
Sustainability Appraisal of Core Strategy	December 2011	completed
Sustainability Appraisal Scoping Report for the Harrow Local Development Framework, including separate reports for each appendix - Appendix 1- policies, plans, programmes, strategies and initiatives Appendix 2 - glossary of terms Appendix 3 - consultation statement Appendix 4 - Scott Wilson verification report Appendix 5 - non-technical summary	November 2006 (Revised 2010)	completed
Joint West London Waste DPD	Underway	
Development Management DPD	Underway	
Site Allocations DPD	Underway	
Harrow and Wealdstone Area Action Plan	Underway	
Sustainable Building Design SPD	May 2009	Adopted
Accessible Homes (revision) SPD	June 2010	Adopted
Harrow on the Hill Village Conservation Areas and Sustainability Appraisal	January 2008	Adopted
RAF Bentley Priory and Sustainability Appraisal	September 2007	Adopted

Report	Date	Status
Harrow Weald Conservation Area SPD	Underway	
Stanmore and Edgware Conservation Area SPD	Underway	
Pinner Conservation Areas SPD	December 2009	Adopted
Access for All and Sustainability Appraisal SPD	April 2006	Adopted
Residential Design Guide SPD	December 2010	Adopted
Accessible Homes and Sustainability Appraisal SPD	April 2006	Adopted

Other

SPGs	Date	Status
Solar Panels and Wind Turbines: A Householder Guide	2007	Informal DC Guidance
Smoke Free Planning Advice	2007	Informal DC Guidance
Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties	2008	Informal DC Guidance
Vehicle Crossings Policy	2008	Policy
Evidence Base		
Harrow Town Centre Development Strategy	2006	Adopted
Harrow Retail Study	2009	Evidence Base
Employment Land Study	2010	Evidence Base
Harrow on the Hill Station Planning Brief	2005	Adopted Planning Brief
Strategic Flood Risk Assessment Level 1	2009	Evidence Base
Strategic Flood Risk Assessment Level 2	2011	Evidence Base

SFRA Level 2 Update	2012	
Characterisation Study	2010	Evidence Base
Viability Assessment	2010	Evidence Base
Infrastructure and Delivery Plan	2011	Evidence Base
Transport Study	2010	Evidence Base
Strategic Housing Land Availability Assessment	2009	Evidence Base
Strategic Housing Market Assessment	2010	Evidence Base
Housing Needs Assessment	2006	Evidence Base
Open Spaces, Sports and Green Belt related Strategies		
London Borough of Harrow PPG17 Sports, Recreation and Open Space Study: An Assessment of Quantity, Quality and Access. By Ashley Godfrey Associates	2010	Evidence Base
Harrow's Green Belt Management Strategy	2006	Final
Harrow Cultural Strategy - 2006-2008 Update	2005	Final
Harrow Biodiversity Action Plan	2009	Final
Harrow Green Grid - Action Plan	2011	Final
Harrow Views Assessment	2012	Evidence Base
Policy and Research related studies and on-going Monitoring reports		
Vitality Profiles 2009	2010	Final Report
Harrow's Diverse Communities 2001 Census Part 1 Population, Housing and Health	2006	Final report
Harrow's Diverse Communities 2001 Census - Part 2 Employment, Unemployment & Qualifications	2006	Final report
Harrow's Diverse Communities 2001 Census - Part 3 Migration and Travel Patterns	2006	Final report

2001 Census - Ward Profiles	2005	Final report
2001 Census - Borough Profile	2005	Final report
2010 Housing Trajectory	2011	Complete
Continuous Monitoring		
Pedestrian Counts (latest counts)	2011	Database
Shop frontages	2011	Database
Industrial Estates	2011	Database
Available Business Premises	2011	Database
Waste Planning related Strategies-Joint standing with West London Boroughs		
Improving the Evidence Base for the Waste Development Plan Document Process in West London. Prepared for West London Waste Planning Authorities By Land Use Consultants	2005	
West London Waste Siting Study Generic Report. Prepared for DEFRA by Land Use Consultants (LUC)	2006	WIP LASU Direct Consultancy Support through DEFRA to improve baseline/evidence to support the Joint working between West London Boroughs for the preparation of the Joint Waste DPD.
Current Study commissioned by West Waste in partnership with West London Waste Departments (work being linked into the Joint Waste DPD Process). AND Organic Waste Reprocessing Feasibility Study Draft Scoping Report. Report 1 of 2 Reports from Study - West London Waste Authority, ERM Prepared by Michael Reid.	2006	
Baseline Report: West London Waste Authority and Constituent Boroughs Final Report	2005	Final
West London Waste Authority - Draft Joint Municipal Waste Management Strategy	2005	Draft
The Development Plan		
Harrow Unitary Development Plan & Proposals Map 2004	2004	Adopted
Other Plans and Strategies		
Deleted UDP Policies as of 28th Sept 2007	2007	Guidance Note

A Sustainable Community Plan for Harrow 2006-2020	2006	Adopted
Community Development Strategy for Harrow 2007-2010	2007	Consultation Draft
Housing Strategy 2002-2007	2002	Adopted
Black and Minority Ethnic Housing Strategy 2004-2007	2004	Adopted
Learning Disability Housing Strategy 2003 - 2006	2003	Adopted
Homelessness Strategy	2003	Adopted
'Building Communities' - A Housing Strategy for West London.	2003	Adopted
Harrow Private Sector Housing Renewal Strategy	2003	Adopted
Harrow Empty Homes Strategy & Report 2002-07	2002	Adopted
Local Economic Assessment	2011	Adopted

B.1 Chapter 7 of the Council's 2006 Scoping Report sets out, alongside each sustainability objective and associated detailed criteria, a list of potential indicators. Many of these relate to information already collected and published annually by the Council for the purposes of its Annual Monitoring Report. In addition new monitoring criteria have been identified in Harrow's Core Strategy which are included in the Annual Monitoring Report and will enable the implementation of the spatial strategy and core policies to be assessed against sustainability objectives.

B.2 This sustainability appraisal relates to the final stage in the preparation of the Development Management Policies DPD, the Site Allocations DPD and the Harrow & Wealdstone Area Action Plan. The monitoring proposals in the DPDs will where possible, utilise the monitoring arrangements that are in place for the Core Strategy.