



EXAMINATION OF THE HARROW LOCAL PLAN 2021-2041

HEARING STATEMENT

MATTER 1: LEGAL COMPLIANCE AND THE DUTY TO COOPERATE

ISSUES 1 AND 2

5 June 2025

Matter 1: Legal Compliance and the Duty to Cooperate

Issue 1: Whether the Duty to Cooperate (DtC) has been satisfied and whether the Plan has been prepared with reference to the relevant procedures and regulations

Duty to Cooperate Questions:

The Duty to Cooperate Statement (CSD04) refers to a number of meetings which have taken place with neighbouring boroughs. Please could you provide the minutes to the meetings referred to as follows -

1.1 Paragraph 3.10 refers to Quarterly meetings to discuss planning work through the West London Alliance – please provide some more detail in relation to these matters. What date did the meetings commence? Were the meetings reoccurring precisely on a quarterly and regular basis? Are all of the matters you have referred to at a-h cross boundary matters in the context of the Harrow Local Plan?

1.1.1 The West London Alliance officer-level meetings relating to planning policy have been occurring on a regular basis since at least 2015. They occur on a regular quarterly basis in February, May, September and December each year. Meetings are scheduled in advance, agendas issued, and minutes circulated.

1.1.2 A typical agenda for the meetings is as follows:

National Planning

- (a) National planning reforms
- (b) Other national planning issues

Regional Planning

- (a) Review of the London Plan
- (b) London wide GTANA Update
- (c) Issues with GLA London Datahub
- (d) Strategic Flood Risk Assessment Hosting
- (e) Any other regional planning issues

Sub-regional Planning

- (a) Joint West London Waste Plan
- (b) Joint Evidence Base
- (c) West London Orbital
- (d) Heathrow Strategic Planning Group
- (e) Cemetery Planning

Borough and other authorities' Updates

- (a) Local plans/supplementary documents/CIL/article 4 directions/neighbourhood plans
- (b) Old Oak/Park Royal MDC Update
- (c) Transport for London Update
- (d) West London Waste Authority
- (e) Other updates

Any other business/Date of next meeting

- 1.1.3 The matters listed at paragraph 3.10 (a)-(h) relate to evidence base work commissioned at a sub-regional level in the context of the WLA. They all relate to strategic matters of a cross-boundary nature such as housing need (including gypsy and traveller accommodation), employment need (West London is essentially a sub-regional market within the London Plan), infrastructure planning (including funding investigation work into the West London Orbital train line, which would serve several WL boroughs and was subsequently reflected in the London Plan) and flood risk. All these pieces of evidence base work have informed the draft Harrow Local Plan.
- 1.2 In relation to the engagement which has taken place with Three Rivers District Council, please provide the minutes of the meetings referred to at paragraph 3.14 of the DtC statement (24 March 2020, 9 June 2020, 10 April 2024). Where the text refers to letters (15 June 2021 letter from Three Rivers requesting Harrow to accommodate unmet need, response from Harrow dated 1 July 2021) please could you also provide copies of these letter. Where formal responses to the regulation 18 consultation are referred to (9 March 2023, 24 November 2023) please provide copies of these consultation responses.**
- 1.2.1 The Council wish to note a typographical error within the tables at 3.14 of the DtC Statement). The final meeting held with Three Rivers District Council should be dated 15th July 2024 and not 10th April 2024. No meeting was held with Three Rivers District Council on the 10th April 2024.
- 1.2.2 The requested information is attached as Appendix 1 (as a separate document).
- 1.3 In relation to the engagement with Hertsmere Borough Council as set out within the DtC statement as well as the Statement of Common Ground (SoCG), please provide the minutes of the meetings referred to at paragraph 3.14 of the DtC statement (22 April 2021, 10 October 2023, 15 May 2024). Where the text refers to letters (10 February 2020, 19 February, 31 January 2020) please could you also provide copies of these letters. Where formal responses to the regulation 18 consultation are referred to, please provide copies of these consultation responses (these should be appended to the hearing statement).**
- 1.3.1 The Council wish to note that there was only one letter sent to Hertsmere in February 2020, being 19 February 2020.
- 1.3.2 The requested information is attached Appendix 1 (as a separate document).

1.4 The Joint London Borough SoCG refers to Hillington however they have not signed the document? What is the reason for this and what matters cannot be agreed upon?

- 1.4.1 There were no matters that could not be agreed upon. The reason for the delay simply related to internal sign-off processes within Hillington which meant they could not sign the Statement of Common Ground prior to the draft Local Plan being submitted to the Secretary of State. The Joint London Borough SoCG LBH/ED10 has been signed by LB Hillington and loaded onto the Examination Library on 09/05/25

1.5 Are there any other SoCG being prepared¹? If so, what are the timings for these?

- 1.5.1 Yes, there are four other statements, which have now all been signed by the relevant parties and provided to the Programme Officer, as follows:
- (a) Environment Agency (LBH/ED11) and loaded onto the Examination Library 09/05/25
 - (b) Historic England (LBH/ED12) and loaded onto the Examination Library (03/06/25)
 - (c) Greater London Authority (LBH/ED13) and loaded onto the Examination Library (03/06/25)
 - (d) Transport for London (LBH/ED14) and loaded onto the Examination Library (03/06/25)

1.6 Does the evidence base confirm that the Council have engaged constructively, actively and on an ongoing basis with the parties identified to address the strategic matters of relevance?

- 1.6.2 Yes. The evidence base does confirm that the Council has engaged constructively, actively and on an ongoing basis with the parties identified to address the strategic matters of relevance as set out in the Duty to Cooperate Statement (CSD04). This is evidenced by the ongoing engagement with the parties identified in the Statement at paragraphs 2.5 and 2.6 throughout the preparation of the Harrow Local Plan. This has included regular Duty to Cooperate meetings, commissioning of joint evidence base work at a West London and pan-London level [which where relevant included wider Duty to Cooperate partners such as the Environment Agency for the Level 1 SFRA (EBBCO6)] and the preparation of Statements of Common Ground.

¹ I am aware that the Council are in the process of producing further SoCG with a number of bodies (see LBH/ED3) however these have not been provided to date. Should further MIQ arise from these documents, I shall endeavour to issues these to the Council in advance of the hearing sessions opening.

1.7 Are there any outstanding concerns from adjoining authorities or any other DtC bodies regarding the DtC? If so in what way has the Council sought to address the issues raised?

1.7.1 There are no outstanding concerns from adjoining authorities with respect to the Duty to Cooperate. This is also evidenced by the agreed Statements of Common Ground. The Council actively and constructively and on an ongoing basis engaged with the relevant DtC bodies and have made a number of proposed modifications to address the issues raised by them. Any strategic matters raised have progressed to a satisfactory resolution, as evidenced by the agreed Statements of Common Ground.

1.8 The SoCG concerning Burial Space advises that the Council are undertaking work to consider sites within its Borough. What is the precise timeframe for the completion of this work?

1.8.1 Please see response to Matter 4, Issue 5, Questions 5.1 and 5.2.

Other legal requirements

Issue 2: Whether the Plan has been prepared with due regard to the appropriate procedures and regulations

Questions:

Consultation

2.1 Has the plan been prepared in accordance with the Council's Statement of Community Involvement (ODS02) and has it met the minimum consultation requirements contained within the relevant Regulations?

2.1.1 The plan has been prepared in accordance with the Council's SCI and has met and exceeded the minimum consultation requirements contained within The Town and Country Planning (Local Planning) (England) Regulations 2012. This is evidenced by the actions documented in the Consultation Statement (CSD05).

2.1.2 For the Regulation 18 the Council met and exceeded the requirements for consultation set out in the SCI (ODS02) and the Regulations; this is documented in section 3 of the Consultation Statement. All documents were available online, at the Council's principal offices and Greenhill Library and other appropriate locations such as all the other libraries for a period of 8 weeks which is in excess of the 6 weeks required.

2.1.3 Further methods were used to increase participation such as static advertising at Council owned venues, newspaper articles, Harrow Borough newsletter / email, stakeholder update / reminder emails, questionnaire / polls, Harrow Talk (EngagementHQ) Platform, street events, attendance at Conversation Cafe and

online / social media. Statutory consultees and other parties who had registered an interest in Local Plan matters were notified of the consultation and invited to make representations.

- 2.1.4 Responses to the Regulation 18 consultation were taken into account in the draft of the Regulation 19 version of the emerging Local Plan; this is documented in section 4 of the consultation statement.
- 2.1.5 The same steps as above were undertaken in respect of the six-week Regulation 19 consultation with respect to document availability and publicity, which is in excess of that required by the SCI. These actions are documented in section 5 of the Consultation Statement.
- 2.1.6 Further methods were used to increase participation such as static advertising at Council owned venues, newspaper articles, Harrow Borough newsletter / email, stakeholder emails, Harrow Talk (EngagementHQ) Platform, two public events and online / social media. Statutory consultees and other parties who had registered an interest in Local Plan matters or responded to the Regulation 18 consultation were notified of the consultation and invited to make representations.
- 2.1.7 While Council policy and regulations do not require translated copies of document to be made available, the Council does seek to be as accessible as possible. The primary consultation platform (Engagement HQ) has an in-built translation function, as does MS Forms, additionally all modern internet browsers are able to translate web content. Where further advice was needed, respondents could contact us directly for advice.
- 2.1.8 The above and the Consultation Statement demonstrate that the plan been prepared in accordance with the Council's Statement of Community Involvement (ODS02) and has met the minimum consultation requirements contained within the relevant Regulations.

2.2 Is there any evidence to suggest that the consultation carried out by the Council during plan making failed to comply with the Council's Statement of Community Involvement?

- 2.2.1 No, there is no evidence to suggest this. Please refer to the response to question 2.1 above and the Regulation 22 Statement (CSDO5).

2.3 Concerns have been raised regarding the accessibility of the format of the consultation form provided and the time allocated for responses – are these concerns justified?

- 2.3.1 No – these concerns are not justified. There were a number of ways made available for respondents to make a representation:
- (a) Exemplar feedback form - the Council made a Harrow specific version of the exemplar feedback form supplied by the Planning Inspectorate available in both a word and pdf version online. Additionally, physical copies of the feedback form were available at all Harrow Libraires and principal office.
 - (b) MS Forms – During the regulation 19 consultation a simple MS Forms form was available online for respondents to use. The form helped guide respondents to allocate their responses against a specific policy/part of the plan and indicate their view on it.
 - (c) Email – Respondents could send an email to local.plan@harrow.gov.uk with their representation.
 - (d) Post - Respondents could write and post their comments to the Council directly.
- 4.3.2 This variation in ways to respond sought to allow for the greatest possible access and opinion to be voiced.
- 4.3.3 The regulation 19 consultation opened on 4th November 2024, and closed on 17th December 2024, a period compliment with the regulations.
- 4.3.4 Respondents were able to get in touch with any concerns or issues with providing feedback, and guidance would be issued.

The Sustainability Appraisal (SA)

2.4 Has the IIA tested all reasonable alternatives?

- 2.4.1 Yes, the IIA tested all reasonable alternatives. Reasonable alternatives were identified at the Local Plan Regulation 18 stage of the process and tested during the plan making process. The Council has worked in close collaboration with its IIA consultations (SLR) on the issue of reasonable alternatives throughout the plan-making process.
- 2.4.2 ‘Chapter 6 Alternatives’ of the IIA Report (CSD03a) includes a summary of all the reasonable alternatives for the proposed Local Plan spatial strategies, policies and site options assessed.
- 2.4.3 Table C2-1 in ‘Appendix C: Summary of Policy Alternatives Assessment’ (CSD03e) demonstrates how the reasonable alternatives for the spatial strategy and scale of growth were identified (this table is reproduced in the answer to question 2.8 below).

- 2.4.4 Council officers identified policy alternatives and identified where no reasonable alternative policy exists. This is made clear within 'Chapter 6 Alternatives' of the IIA Report (CSD03a) and within 'Appendix C: Summary of Policy Alternatives Assessment' (CSD03e Section 10 p26) which contains the full wording of the reasonable alternatives for the plan policies assessed. 'Appendix C: Summary of Policy Alternatives Assessment' (CSD03e) also contains a summary of the performance of each policy alternative, allowing comparison between all reasonable policy alternatives.
- 2.4.5 Section 6.3 (p80) of the IIA Report (CSD03a) sets out the methodology undertaken to identify reasonable alternative sites. The answer to question 2.7 below provides details of this process. All reasonable site alternatives have been taken forward as allocations within the plan in order to meet the proposed housing target and in recognition that any London Plan / Local Plan target is a minimum. The detailed assessments of site alternatives can be found in 'Appendix F: Assessment of Pre-Submission Local Plan Sites' (CSD03h) and are summarised within 'Section 8 Assessment of Site Options' of the IIA Report (CSD03a).
- 2.4.6 All reasonable policy alternatives have been assessed to the same level of detail as the preferred policies and all assessment findings are summarised within 'Appendix C Summary of Policy Alternatives Assessment' (CSD03e). The detailed assessment spreadsheets for the preferred policies can be found in 'Appendix D: Assessment of Pre-Submission Local Plan Policies' (CSD03f) and the summarised findings are presented in 'Section 7 Assessment of the Draft Local Plan Policies' of the IIA Report (CSD03a). The detailed assessment spreadsheets for all policy alternatives can be found in 'Appendix E: Assessment of Alternative Local Plan Policies' (CSD03g).

2.5 To what extent has the IIA informed the content of the Plan?

- 2.5.1 The IIA has played a significant role in informing the preparation and content of the Draft Local Plan throughout the process, with the objective to promote sustainable development.
- 2.5.2 The Local Plan IIA scoping stage was undertaken at the early stage of the plan-making process in order to develop an IIA framework (LPPD06). Detailed IIA assessments of the Local Plan and its reasonable alternatives have subsequently been undertaken against the IIA framework at each stage of the plan-making process and IIA findings have been available to inform decision-making.
- 2.5.3 At the Local Plan Regulation 18 and 19 stages, the Council assessed the performance of the spatial strategy, policy and sites reasonable alternatives, to determine the most appropriate policies to take forward. The reasons for

selecting the preferred policies over the reasonable alternatives are set out within section 6.2 (p57) of the IIA Report (CSD03a).

2.5.4 The Council considered the IIA recommendations in relation to; mitigating any negative/uncertain effects; enhancements for neutral or potential minor positive effects of Local Plan policies and allocations. A response was provided to these, and amendments were proposed to policies and the detailed site allocation templates if necessary (Chapter 11 of the November 2024 Local Plan, p295 onwards), to mitigate/minimise any uncertain or potential adverse effects or improve neutral or positive effects. Further details of any changes made to the Local Plan in response to IIA recommendations are included in Appendix 3.

2.5.5 The IIA recommendations to monitor any significant environmental effects of the Local Plan were also considered against the Local Plan monitoring framework, to determine if any changes were required.

2.6 The submission version of the IIA contained a number of incomplete references (pages 18/85/100) please could the Council provide a version of the report with the correct references. This should also be uploaded to the examination library with a note explaining what the errors in the references were and how these have been updated.

2.6.1 The incomplete references in the IIA report and updates to these are outlined below:

Page of IIA report	Updated references
Page 18	The significance criteria set out in Error! Reference source not found. <u>Table 2.5</u> was used to determine the potential sustainable performance of the policies and site options.
Page 85	For each group of policies, a summary table is presented which contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is shown in <u>Table 7.1</u> Error! Reference source not found.
Page 100	The key to the sustainability effect scores is the same as that shown in Error! Reference source not found. <u>Table 7.1</u> . The sites assessed are listed in the left-hand column of the summary table.

2.6.2 An updated corrected IIA Report has been uploaded onto the examination library (core document reference CSD03a).

2.7 Are the reasons for selecting the sites contained within the plan sufficiently clear and have the reasons for discounting alternative sites been clearly articulated?

2.7.1 Yes. The reasons for selecting the sites contained with the plan are clear and the reasons for discounting alternative sites are clearly articulated

Methodology

2.7.2 Section 6.3 (p80) of the IIA Report (CSD03a) sets out the methodology undertaken to identify reasonable alternative sites. The Council undertook this process in three stages:

1. Site Identification and Initial Site Eligibility Sifting;
2. Site Suitability Assessment; and
3. Detailed Assessment.

2.7.3 A total of 98 sites were identified. Of these 98 sites, 36 were excluded at the end of stages 1 from further consideration because they had been delivered or were expected to be completed by the commencement of the Plan, having regard to Council's development monitoring and housing trajectory.

2.7.4 Sites only proceeded if they had an area of at least 0.25ha or were proposing to deliver at least 10 housing units or 500sqm of additional employment floorspace. Of the remaining 62 sites which passed step 1, 10 sites did not meet these criteria (but will contribute to the pipeline of small sites under Policy HO3 (Optimising the use of small housing sites)).

2.7.5 In step 2, 52 sites were assessed by the Council against a range of policy considerations such as compliance with the London Plan, accessibility, and potential environmental and heritage impacts. A further 11 sites were excluded from the process following step 2, based on criteria that considered if they were located within designations such as Green Belt, Metropolitan Open Land (MOL), open space, industrial land and contrary to Local and London Plan policies.

Table 1: List of sites excluded via a site suitability assessment

Site	Site source	Reason excluded
Old Milhillians Sports Ground and Adjoining Lane	Call for sites	Site in Green Belt
Harrow Garden Centre	Call for sites	Site in Green Belt
Land at Headstone Lane	Call for sites	Site in Green Belt
Pinnerwood Farm	Call for sites	Site in Green Belt
Copse Farm	Call for sites	Site in Green Belt
Stanmore and Edgware Golf Centre	Call for sites	Site in Green Belt
Old Redding Public House	Call for sites	Site in Green Belt
Land at Magpie Hall Road	Call for sites	Site in Green Belt

Site	Site source	Reason excluded
43 Glenlead Road Stanmore	Call for sites	Site in Green Belt
John Lyon School (Sudbury Playing Fields)	Call for sites	Site in Metropolitan Open Land
Old Lyonian Sports Ground	Call for sites	Site is designated open space
110-116 Greenford Road Sudbury Hill	Call for sites	Site in employment use and did not meet criteria for allocation

- 2.7.6 Two further sites in Green Belt were not excluded at this stage as they were allocations in the existing Local Plan, namely the Royal National Orthopaedic Hospital (RNOH) and Watling Farm; they therefore met the criteria / approach applied at paragraph 2.7.3 above with respect to existing allocations that have not yet been completed and where there remains an intention to develop.
- 2.7.7 In step 3, the Council undertook a detailed assessment of the suitability, availability and achievability of the remaining 41 sites identified. All of the 41 sites were considered suitable for potential allocation and were passed to the consultants for IIA assessment as reasonable alternatives.
- 2.7.8 Site allocation reasonable alternatives have been considered with the intent of meeting the Borough's identified housing requirement over the plan period, including a buffer to accommodate potential under-delivery. Site allocation reasonable alternatives have also been identified, where required, to accommodate additional non-residential and infrastructure development to meet identified need.
- 2.7.9 Harrow is an urban area with a tight built-up boundary, part of which extends into the neighbouring Boroughs and formed by Green Belt. Due to this and in order to meet the identified housing requirement over the plan period, all of the site options (41 in total) considered suitable for housing development by the Council were assessed as reasonable alternatives in the IIA process and all suitable site options have been included within the Local Plan as allocations. This is explained within Section 6 of the IIA Report (CSD03a).
- 2.7.10 The preferred level of growth was not determined before the reasonable alternative site options were identified due to reasons outlined below:
- 2.7.11 At the Regulation 18 stage of the Regulations, the council considered the potential inclusion of a housing requirement of 16, 040 homes (i.e. London Plan 10-year target of 8020 x 2 to cover the plan period) and 24,266 homes (i.e. based on 2018 household projections) between 2021-41, based on the Local Housing Need Assessment (EBH01). In addition, it considered the inclusion of a lower target of 12, 829 homes based on the London 2017 Strategic Housing Land Availability Assessment (SHLAA).

- 2.7.12 The supporting text of London Plan Policy H1 states “If a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity, in consultation with the GLA” (para 4.1.11). In line with this, a high-level initial assessment of all potential sources of housing supply (e.g. extant permissions, sites under construction, existing unimplemented allocations, Small Sites Windfall allowance as per the London Plan) was undertaken at the Local Plan Regulation 18 stage (LPPD01). This suggested the Borough had a potential capacity to deliver 14,762 homes, resulting in a shortfall of 1,278 homes against the proposed requirement of 16,040.
- 2.7.13 Although the Local Plan Regulation 18 consultation document indicated the proposed housing requirement of 16,040 homes was preferred, no final decision was taken by the Council in relation to the housing requirement that should be included within the Local Plan at that stage. The key reasons were:
- (1) A call for sites consultation was being undertaken at the same time as Local Plan reg 18 consultations, to ensure all potential sites identified were assessed for potential allocation.
 - (2) The Reg 18 document indicated further detailed work on the evidence base will be undertaken to assess the potential availability, suitability and achievability of all sites submitted, existing sites allocations, to determine which sites should be allocated within the Plan.
 - (3) In addition, a design led capacity assessment will be undertaken to determine the optimum number of homes and other uses that could be delivered on the sites, to address future needs.
 - (4) The Local Plan Reg 18 document did not include details of any proposed site allocations and all information of these was included in the Local Plan Reg 19 consultation document.
 - (5) Due to the above factors, the Local Plan Reg 18 IIA assessed two reasonable alternative housing growth options of accommodating 24, 266 homes and 12,829 homes between 2021-41. As noted in IIA Report (Section 6.2.3), none of the alternatives performed better than the preferred option (CSD03a).
- 2.7.14 After the Regulation 18 call for sites consultation (26 February and 25 April 2024), the site selection process considered the suitability, availability and achievability of all existing allocations, site submissions and council owned regeneration sites (EBH01). The design led capacity work indicated that; proposed housing site allocations, along with other sources of housing supply; have a potential to meet/exceed the proposed housing requirement of 16,040 units.
- 2.7.15 Overall, all the potential sites identified to accommodate the future housing needs are proposed to be allocated via the Local Plan process. In line with the London Plan, design led capacity work evidence has been undertaken to determine the optimum housing capacity of the sites and indicates these lack capacity to meet a housing requirement of above 16,040 homes.

- 2.7.16 Furthermore, there is no evidence to support inclusion of a higher housing requirement higher than 16,040; the IIA notes that the preferred housing requirement of 16,040 performs better than the reasonable alternatives (Table C6.1, IIA Report Appendix C) and the inclusion of a higher housing requirement would require the release of Green Belt/MOL and employment land to meet higher housing needs, which would be contrary to the London Plan and NPPF.
- 2.7.17 The Local Plan Reg 18 consultation document identified a reasonable alternative to accommodate 12,829 homes based on the capacity of sites identified in the 2017 London Plan SHLAA and the small sites windfall allowance. This option was not taken forward, as the London Plan (para 4.04), indicates that any local housing requirement beyond 2029 should be based on the 2017 London SHLAA or any local identified evidence of capacity. Local Plan evidence indicates the capacity from all sources of housing supply is capable of meeting/exceeding the preferred housing requirement of 16,040 homes. The IIA indicates the preferred option of including a housing requirement of 16,040 homes performs better than the alternative of 12, 829 homes, particularly in relation to increasing housing delivery to address needs for affordable and family sized dwellings.
- 2.7.18 The amount of development on the 41 proposed allocation sites has been maximised. In line with the London Plan Policy (D3), the Council undertook a design led capacity assessment to optimise the housing output of the proposed allocations. This also considered the quantity of housing units of sites that had extant permissions on the proposed allocations. In addition, an uplift of 10% was applied to housing capacity of proposed site allocations (refer to site selection background paper). It is considered that all options for increasing the potential capacity of all the proposed site allocations have already been explored, based on site specific and policy constraints that may apply.
- 2.7.19 The site selection background paper and other evidence demonstrates the preferred option seeks to accommodate the preferred housing requirement of 16,040 homes and preferred spatial strategy of prioritising PDL sites located within the most accessible, sustainable locations and within the built-up area; have sufficient capacity to meet/exceed a housing requirement of 16,040 homes. Therefore, there was no justification to reconsider any sites that were considered unsuitable for potential allocations via the site selection process (e.g. GB, MOL, employment land) and plan making process.

2.8 Overall, does the IIA demonstrate that the submitted plan is justified, and would it comprise an appropriate strategy, taking into account the reasonable alternatives?

- 2.8.1 Yes. Table C2-1 in 'Appendix C: Summary of Policy Alternatives Assessment' (CSD03e) summarises how the reasonable alternatives for the spatial strategy and scale of growth were identified. This table is reproduced below as Table 2. It demonstrates that three reasonable alternatives for spatial strategy and growth were identified and assessed.
- 2.8.2 The IIA Report (CSD03a) demonstrates the preferred Local Plan policies and proposed site allocations are justified and an appropriate strategy against the reasonable alternatives. This is set out in 'Section 6 Alternatives' (CSD03a) and in 'Appendix C: Summary of Policy Alternatives Assessment' (CSD03e) of the IIA Report. This appendix provides a summary of the scoring of all the Local Plan preferred policies and the reasonable alternatives (where appropriate) against the IIA framework. Detailed assessment matrices of the alternative policies can be found within 'Appendix E: Assessment of Alternative Local Plan Policies' (core document reference CSD03g).
- 2.8.3 Section 6.2 (p.57) of the IIA Report (CSD03a) provides a commentary of the performance of all the preferred policies and their alternatives (where appropriate) including the spatial and growth reasonable alternatives against the IIA framework, as well as the reasons for selecting the preferred policy options and rejecting the alternatives. This indicates that all of the preferred policy options generally perform better than the reasonable alternatives. The exceptions to this are:
- (1) The preferred spatial strategy performs (page 25 , CSD01, Submitted Plan) similarly to spatial strategy alternative 1 (i.e. continue with existing spatial strategy to deliver 12,829 homes);but it performs less positively with regards to IIA objective 12 (landscape and townscape) but more positively than spatial strategy alternative 1 for IIA objective 7 (air noise and light pollution) and objective 8 (climate change)(see p58-61 of the IIA Report core document reference CSD03a, summary of assessment in 'Appendix C Summary of Policy Alternatives Assessment' core document reference CSD03e p2-5, and detailed assessment in 'Appendix E: Assessment of Alternative Local Plan Policies' core document reference CSD03g).

Table 2: Extract from IIA: Table C0-1: Spatial Strategy Reasonable Alternatives

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
Spatial Strategy: Preferred Alternative Growth directed to H&W Opportunity Area (min. 7,500), Rest of the Borough (min. 2,500), Small Sites (min 4,125), plus windfall.	This growth option would not be a reasonable alternative under preferred spatial strategy, as this will not deliver sufficient housing to address housing needs of circa 16,000 or Local plan evidence indicates the Borough is likely to have sufficient capacity to deliver in excess of 12,000 homes	Reasonable alternative	This is not considered a reasonable alternative, as previously developed sites would have insufficient housing capacity/infrastructure capacity to accommodate this level of housing growth within the locations that are expected to accommodate growth (e.g. Opportunity Area, small sites, edge/within Town Centres). Further, this will be contrary to the spatial strategy that seeks to protect/enhance the character of the area (including suburban location), historic environment. Overall, this growth option will be undeliverable under this spatial strategy.
Spatial Strategy: Alternative 1 Current spatial strategy – growth directed to H&W Opportunity Area	Reasonable alternative. This spatial strategy option could accommodate this lower housing	This is not considered a reasonable alternative because the current spatial strategy	This option is not a reasonable alternative because there is not enough sites / space to deliver it

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
	growth option. The key difference between existing and the preferred strategy is the small sites policy that may result in development within a larger geographic area.	planned for a London Plan target of circa 350 homes per year, which has been gradually increased over time with various iterations of the London Plan (currently 802 per year). The indicative housing numbers for site allocations in the current plan are very low / insufficient to deliver growth of 16,040 new homes. The current spatial strategy also doesn't fully address the role of tall buildings in the Opportunity Area which would be required to deliver a 16,040 target.	without small sites, the GB/MOL sites which and employment sites needed to be developed in the spatial strategy. As above, this high growth option would not be a reasonable alternative for this spatial strategy, as the Opportunity Area/area of intensification and town centre/edge of locations and small sites would have insufficient capacity to accommodate this level of growth. This level of growth will be undeliverable.

Spatial Strategy Options	Housing Growth Options		
	Strategic Policy 03, Alternative 2: Low Housing Growth (12,829 dwellings between 2021-41)	Strategic Policy 03; Preferred Policy: London Plan Policy H1 (housing delivery 2019/20-2029) and identified housing need growth (housing delivery 2030-2041), 16,040 dwellings between 2019/20 – 2040/41)	Strategic Policy 03, Alternative 1: High Housing Growth (24,266 dwellings between 2020-41)
Spatial Strategy: Alternative 2 Accommodating higher growth, redevelopment of employment land and development of greenbelt land.	This low housing growth option would not be a reasonable for this spatial strategy alternative 2. The key reason is that the Council is likely to have sufficient capacity to address this level of growth on PDL sites within the existing urban area without the need for release of Green Belt, or employment land to meet housing needs. There would be insufficient justification to release employment land (the evidence base indicates this needs to be retained) and Green Belt / MOL if the outcome was to deliver a lower level of housing and not optimise previously developed land (PDL).	This would not be a reasonable alternative, as the updated call for sites / site allocations process indicates a sufficient capacity to meet/exceed the 16,040 housing target. without needing to redevelop employment land (which the London Plan and evidence base indicates needs to be retained) and / or Green Belt (which the NPPF and London Plan indicates would be inappropriate development unless very special circumstances can be demonstrated).	Reasonable alternative

The preferred spatial strategy was selected, as this seeks to prioritise the delivery of sufficient sites on previously developed land, within the most accessible locations of the existing built-up area, to address the Boroughs housing needs (16,040 homes), particularly for family and affordable homes. This will ensure development is delivered within locations where infrastructure capacity exists, promotes the use of sustainable modes of transport, reduces CO₂ emissions and the impacts of climate change. In addition, it will protect enhance the existing stock of employment land, assets such the Green Belt, MOL, open spaces and character of Borough

- (2) For policy GI3: Biodiversity,(page 231 , CSD01, Submitted Plan) both preferred policy (i.e. 15%) and the alternative (10% in line with the Environment Act) performed similarly against the IIA objectives (see p78 of the IIA Report core document reference CSD03a, summary of assessment in 'Appendix C Summary of Policy Alternatives Assessment' core document reference CSD03e p24, and detailed assessment in 'Appendix E: Assessment of Alternative Local Plan Policies' core document reference CSD03g). The preferred policy was selected to ensure new development increases biodiversity.

- 2.8.4 The IIA assessed a total of 41 reasonable alternative site options that the Council considered suitable and available for potential allocation via the Local Plan process. All 41 of the sites are proposed to be allocated. See further details in the response to Question 2.7.

2.9 Document EBH01 refers at paragraph 4.12 to the IIA testing of alternative spatial strategies. At paragraph 4.13, part C, the text states that as set out in the Regulation 18 Draft Local Plan and IIA, this alternative would meet a greater proportion of the Borough's objectively assessed housing need. Can the Council clarify what this reference relates to?

- 2.9.1 Document EBH01 includes text which states "Sites excluded for these reasons shown above contravene draft Local Plan policies which have been tested against reasonable alternatives during the local plan process and through integrated impact assessment (para 4.12)". This is an error in the document as any sites that were excluded from the plan making process due to them contravening Local Plan policies were not considered reasonable alternatives and not tested via the IIA.
- 2.9.2 Whilst the reference in para 4.13 of document EBH01 relates to spatial strategy alternative 2 (i.e. housing growth of 24,266 homes or higher), Section 6.2.1 of the IIA report (p58) and 'Appendix C: Summary of Policy Alternatives Assessment' provide a more detailed explanation of what this would entail and the level of housing growth that could be accommodated.

Habitats Regulations Assessment (HRA)**2.10 Has the Habitats Regulation Assessment (HRA) been undertaken in accordance with the Regulations and is it robust?**

2.10.1 Yes, the Local Plan Habitats Regulations Assessment (HRA) is produced in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and good practices (CSD03h).

2.10.2 The HRA Scoping Report (October 2023) indicated there are no European designated habitat sites (i.e. referred to Habitat Sites, henceforth) within the Borough, but the assessment needs to consider whether any activities within the Borough, in combination with other plans/projects may affect Habitats Sites outside of the Borough. Having considered sites further away, the following Habitats Sites were included within the scope of the HRA:

- Epping Forest SAC (19km to the north east);
- Wormley-Hoddesdonpark Woods SAC (17km to the north east);
- Chiltern Beechwoods SAC (25km to the north east);
- Burnham Beeches SAC (16km to the west);
- Wimbledon Common SAC (14km to the south);
- Richmond Park SAC (11km to the south);
- South West London Waterbodies SPA (13 km to south west);
- Windsor Forest & Great Park SAC (19km to the south west);
- Thames Basin Heaths SPA (24km to the south west);
- Thursley, Ash, Pirbright & Chobham SAC (24km to the south west);
- Thames Estuary and Marshes SPA and Ramsar (50km to the east);
- Essex Estuaries SAC (58km to the north east);
- Medway Estuary & Marshes SPA (60km to the south east); and
- Lee Valley SPA and Ramsar (14km to the north east).

2.10.3 HRA screening was undertaken at the Local Plan Regulation 18 (LPPD03f) and 19 stages (CSD03h). This exercise screened the Local Plan policies and site allocations to identify impact pathways with the Habitat Sites, alone and in combination with other plans and projects and considered if they could result in likely significant effects on any of the Habitat Sites in terms of their conservation objectives and qualifying interests.

2.10.4 Screening identified potential risks to the Habitat Sites due to the quantum of proposed development in combination with growth activities in other areas. The impact pathways for the policies and allocations that could lead to significant effects on the habitat sites were identified, to ascertain if likely significant effects could be excluded. The impact pathways identified were recreation pressures, air quality, water quality and water resources.

- 2.10.5 Screening concluded an Appropriate Assessment (AA) was required, as the Plan has potential for impact pathways, in combination with other plans and projects, that could potentially undermine the Habitats Site's conservation objectives and likely significant effects could not be excluded.
- 2.10.6 An AA has been undertaken at the Local Plan Regulation 19 stage (CSD03h). This considered potential effects relating to recreation pressures, air quality, water quality and water resources.
- 2.10.7 The AA concludes there are no in combination adverse effects on the integrity of any Habitat Sites, arising from impact pathways such as recreational pressure, air quality, water resources. In relation to water quality, it concludes the in-combination effects on the integrity of the Thames Estuary and Marshes SPA and Ramsar can be excluded, if the recommended mitigations for strengthening policies are implemented. The Local Plan (Regulation 19) policies SP08 and CN4 were modified, prior to consultation, in line with the HRA recommendations.
- 2.10.8 Natural England was consulted on in February 2024 at the Local Plan Regulation 18 stage and in November 2024 at the Local Plan Regulation 19 stage. As highlighted in document CSD03h_Reg 19 IIA Report Appendix G HRA, Natural England had no comments to make on the HRA screening. A further email (dated 31/01/25) from Natural England confirms it is satisfied with the findings of the AA (and is attached as Appendix 2).

Climate Change

- 2.11 **Has the Council had regard to Section 19 of the 2004 Planning & Compulsory Purchase Act (As amended) requiring development plan documents to include policies designed to secure the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change?**
- 2.11.1 Yes, the Council has had regard to the requirements of the Act relating to climate change (mitigation and adaptation). This has been achieved by being consistent with the policies in the NPPF 2023 and in general conformity with the London Plan, as well as ensuring that where appropriate, policies contribute either directly (i.e. Chapter 8: Responding to the Climate and Nature Emergency) or indirectly (the balance of the plan) to mitigating of and adaptation to climate change (see response to question 2.12 below for specific policies that directly respond to climate change).

2.12 With reference to Strategic Policy 8: Responding to the Climate and Nature Emergency, could the Council please identify these policies and set out how will they be monitored for their effectiveness?

2.12.1 The main policies that will contribute to the achievement of Strategic Policy 9 and meet the Council's obligations under the Act are as follows:

Clean Energy Used Efficiently

- (a) CN1: Sustainable Design and Retrofitting – direct mitigation of climate change through setting standards to achieve net zero carbon in new development and promoting retrofitting in recognition of the embodied carbon in existing buildings. Monitored by KPI5 (Energy Efficiency) and KPI6 (Net zero carbon)
- (b) CN2: Energy Infrastructure – direct mitigation of climate change through promoting local sustainable energy solutions following the energy hierarchy. Monitored by KPI6 (Net zero carbon)

Green Mobility

- (c) Strategic Policy 10: Movement, Policies M1: Sustainable Transport, and M2: Parking- these contribute to the mitigation of climate change by promoting more sustainable forms of transport that emit lower carbon emissions per mile travelled (including requirements to facilitate the use of electric vehicles). These will be monitored by KPI7 (Public transport accessibility) as well as M-I1 (mode share) and M-I2 (EV Charging points).

Waste-Free Economy

- (d) Strategic Policy 9: Managing Waste and Supporting the Circular Economy, and Policies CE1: Reducing and Managing Waste, and CE2: Design to Support the Circular Economy, contribute to the mitigation of climate change by promoting and facilitating the waste hierarchy (reduce, reuse and recycle), which reduces carbon emissions in the construction and operation of buildings. This will be monitored through indicator CE-I1 (Waste recycled or composted).

Healthy Places for us and Nature

- (e) Policies CN3: Reducing Flood Risk, and CN4: Sustainable Drainage, facilitate adaptation to climate change by requiring flood mitigation measures that will assist in responding to the increased levels of flooding expected because of climate change. This will be monitored through conditions on relevant planning permissions requiring compliance with Flood Risk Assessments on relevant applications.
- (f) Policy CN1: Sustainable Design and Retrofitting will contribute to climate change adaptation by requiring the efficient use of water to deal with water stress arising for hotter, drier summers expected because of climate change. This will be monitored through conditions on any relevant permission requiring compliance with the water efficiency standards.

- (g) Policies GI3: Biodiversity and GI4: Urban Greening, Landscaping and Tree will contribute to both mitigation and adaptation. Trees / vegetation help mitigate climate change by carbon storage. Green Infrastructure assists with adapting to climate change by addressing the biodiversity impacts of a warmer climate, reducing flooding and reducing the urban heat island effect. This will be monitored through indicators GI-I4 (Biodiversity) and GI-I5 (Urban Greening factor).

2.12.2 The overall plan contributes to climate change mitigation and adaption and meeting the Council's obligations under the Act. For example, the Spatial Strategy directs new growth to areas that are most accessible to sustainable transport options, and services / community infrastructure, reducing the need for travel. Heritage policies seek to retain and enhance heritage assets (and the embodied carbon within them). Local Economy policies seek to retain employment opportunities locally, reducing the need for and length of journeys.

Equalities

2.13 How does the Plan address the three aims of section 149 of the Equalities Act 2010 in relation to those who have relevant protected characteristics?

2.13.1 Section 149(1) of the Act requires that 'a public authority must, in the exercise of its functions, have due regard to the need to

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.'

2.13.2 The Local Plan addresses these three aims by assessing the impact of the plan on persons with protected characteristics in order to identify where there maybe negative impacts [addressing paragraph (a) of section 149(1)] and also opportunities for positive impacts [paragraphs (b) and (c)]. This has been done through two primary mechanisms, described below.

2.13.3 The Integrated Impact Assessment (IIA), which includes criteria relating to equalities. Chapter 9 of the main report (CSD03a) summarises the potential significant positive effects the Local Plan policies and site options may create, relating to EqIA. No potential significant negative or uncertain effects have been identified in relation to equalities for Local Plan policies and site options.

2.13.4 A separate Equalities Impact Assessment (EqIA) was prepared to accompany the reports to Cabinet and Full Council in relation to the draft Local Plan (CSD10). Section 1b of the EqIA summarises the impact of the draft Plan on the relevant protected characteristics and concludes there are no negative impacts upon any group and for some groups, some positive impacts were identified.

Local Development Scheme

2.14 Is the Plan compliant with the Local Development Scheme (LDS) and if not does the LDS need to be updated?

2.14.1 Yes, the Plan is compliant with the Local Development Scheme (LDS) (CSDO9).

2.14.2 The Plan has followed the approach to reviewing the current Local Plan as set out in paragraphs 3.2 - 3.5 and the management of the local plan preparation process under Section 4.

2.14.3 The Local Plan preparation has been and is in general accordance with the timetable set out for the new local plan review as set out at paragraph 3.6. Whilst there was minor slippage with respect to the timeframes for Regulation 18 and 19 consultations (circa 5 months and 2 months respectively), submission of the plan (February 2025) was only one month later than indicated in the LDS (January 2025).

2.14.4 Given the above, that the LDS does not require updating at this time.

Appendix 1: Duty to co-operate correspondence requested as part of Issue 1

Please refer to separate document.

Appendix 2: Natural England Correspondence relating to HRA conclusions

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Sent: 31 January 2025 09:52

To: Mohammed Azram <Mohammed.Azram@harrow.gov.uk>

Subject: RE: Natural England consultation response to the Harrow Local Plan (Reg 19) IIA and HRA

Caution: External email

Good Morning Mr Azram

Thank you for your email, please accept my apologies for this oversight.

Our records show that we did send out a response to the Integrated Impact Assessment and HRA documents consultation on 17.12.24, however it is not very specific.

I can confirm that Natural England have no specific comments to make on these documents and we are satisfied with the findings of these.

Please do not hesitate to contact me if you require any further assistance.

Regards

Sharon Jenkins

Consultation Team

Natural England

From: Mohammed Azram <Mohammed.Azram@harrow.gov.uk>

Sent: 30 January 2025 11:44

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Cc: [REDACTED]

Subject: Natural England consultation response to the Harrow Local Plan (Reg 19) consultation document and its supporting evidence (.i.e. IIA and HRA)

Dear Sharon Jenkins

Thank you for your consultation response (dated 19/11/24) to the Draft Harrow Local Plan (Reg 19) consultation document.

We have noticed that this response notes that “Natural England has no comments to make on your consultation request for the London Borough of Harrow Local Plan and proposed Site Allocations”. As part of the Harrow Local Plan (Reg 19) consultation we were also consulting on the Harrow Local Plan Integrative Impact Assessment (IIA), the Habitats Regulations Assessment that was included within appendix G of this.

However, your response includes no reference to the IIA and HRA, even though a separate email was sent to inform you of this during the consultation.

Therefore, we would be grateful if you could please confirm whether the Natural England consultation response also relates to the Harrow Local Plan IIA, HRA and that you are generally satisfied with the findings of these. These documents can be viewed via the webpage below:

New Local Plan Consultation – London Borough of Harrow

Please let me know if you have any queries or require any assistance in relation to this matter.

Kind Regards
Mohammed Azram
Principal Planning Policy Officer
Planning Policy Team
London Borough of Harrow Council

Appendix 3: IIA recommendations and responses / proposed changes**A. Local Plan Reg 18 IIA recommendations and LHBC response /proposed changes**

Local Plan Policy	IIA objective	IIA effect	IIA recommendation	LHBC response
GR1 Achieving a High Standard of Development	IIA3	Neutral	Enhancement: The policy could include more references to designing developments inclusively, for a range of users as appropriate to the proposed development.	<p>Refer to Policy GR3 (Inclusive Design) in the supporting text</p> <p>The proposed change is included below:</p> <p>Add new sub-section at end of Policy GR1:</p> <p><u>Accessibility</u> Residential development must be designed to include wheelchair and accessible standard housing in accordance with Policy D7 of the London Plan. Accommodation for elderly people will also provide appropriate wheelchair accessibility in accordance with Policy HO6. I. Non-residential development and change of use proposals must be accessible to all and with dignity (Policy GR2) and new public realm development must also take into account the accessibility needs of all users (Policy GR3)</p>
GR3 Public Realm and Connecting Places	IIA3	Minor positive	Enhancement: The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.	<p>Refer to Policy GR3 (Inclusive Design) in the supporting text</p> <p>Proposed change: See above</p>
HO1 Dwelling Size Mix	IIA3	Minor positive	Enhancement: The inclusion of wording in criterion B (Flatted Developments) to the effect of	Disagree. Part B4 of the policy seeks to ensure a higher proportion of suitable family sized dwellings are provided in flatted developments, to address local needs. But some text has been included could be

Local Plan Policy	IIA objective	IIA effect	IIA recommendation	LHBC response
			ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.	<p>enhanced by also including reference to ensuring lower floors are prioritised for those with mobility issues. In addition, it should be noted that the new inclusive design policy and London Plan Policy D7 Accessible housing will apply to proposals relating to Wheelchair accessible/adaptable dwellings.</p> <p>Proposed change: Amend Part 4 of the policy as follows:</p> <p>These should be well designed to address the needs of family members and other residents who may be disabled and elderly or other mobility issues. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the scheme would result in a poor-quality living environment for families; based on the above criteria.</p>
Policy HO5 Housing Estate Renewal and Regeneration	IIA8	Minor positive	Enhancement The inclusions of low carbon and energy efficient design within regeneration proposals could be included within this policy to further improve the potential positive effect identified.	<p>Local Plan Policies SP08: Responding to climate and nature emergency, and CN1: Sustainable Design and Retrofitting will apply. These seek to ensure development proposals explore measures to utilise low carbon and renewable energy sources and promote the efficient use of energy, CN2: energy efficiency, will apply. The supporting text notes that energy efficiency of the exist uses within the existing estates is an issue and requires the master planning process for the potential development of these to propose measures to address this.</p> <p>There is no need to the repeat the content of policies, as planning decision will be made in accordance with the policies in the Development Plan. But reference to the other policies could included within the supporting text.</p> <p>Proposed amendment</p>

Local Plan Policy	IIA objective	IIA effect	IIA recommendation	LHBC response
				<p>Amend last bullet point below para 4.5.14 as below:</p> <p><u>(h) Measures to promote the efficient use of resources, minimise energy usage and explore options for the use of low carbon or renewable energy sources, in line with Policies SP08, CN1 and CN2.</u></p>
Policy HO3 Optimising the use of small housing sites	IIA10	Minor positive	Enhancement: Further enhance the potential positive effect identified, the expansion of criterion 3e to consider connections with adjoining sites or expansion of existing GI on those could help to increase the network of habitats within the Borough.	<p>Amend last sentence of para 4.3.6 as follows</p> <p>Therefore, the design of proposals should consider urban greening to protect and enhance biodiversity, in line with <u>Policies GI3: Biodiversity and GI4 Urban Greening, Landscaping and Trees.</u></p>
GR3 Public Realm and Connecting Places	IIA11	Minor positive	Enhancement: The policy does not mention the design of the public realm to respond specifically to the historic environment. If this requirement were added to the policy, it would perform more positively.	<p>The supporting text of Policy GR3 (para 2.3.2), was amended as below:</p> <p>The design of the public realm cannot be a one size fits all approach; it must provide a high-quality space suitable for the surrounding area and its users. <u>Whilst new public realm provides an opportunity to encourage new high-quality space, it should also respond to the existing landscape / townscape character of an area, picking up on local distinctiveness. Existing local characteristics that contribute to the understanding or appreciation of an area should be retained, including existing trees.</u> All new or enhanced public realm should be based on the guidance as set out Historic England's Streets for All – London (2018), and the Mayor's Healthy Streets Approach.</p>

Local Plan Policy	IIA objective	IIA effect	IIA recommendation	LHBC response
HO2 Conversion and redevelopment of larger dwellings	IIA11	Minor positive	Enhancement: The addition of explicit text which requires the consideration of the local historic environment could help to further improve the score for IIA13.	<p>In response to issues raised in Historic England's representation and IIA, a new sentence was added to supporting text of Policy HO2, as below.</p> <p><u>In line with national and local policies (.i.e. SP2, HE1) relating to the historic environment, it will be important of proposals for the conversion/redevelopment of dwellings to include a high quality design scheme, materials that enhance, protects the significance of both designated (e.g. nationally Listed Buildings, conservation areas, etc), non-designated heritage assets (e.g. Local Areas of Special Character) and the their settings. Further, it should be noted a heritage impact assessment and listed building consent may be required on a case-by-case basis. The Council will give regard to the desirability of preserving listed buildings, the character and appearance of them, their setting and those features which make it special.</u></p>
GR3 Public Realm and Connecting Places	IIA12	Minor positive	Enhancement: The policy does not mention the design of the public realm to respond specifically to the existing landscape/townscape character and local distinctiveness. Safeguarding landscape and townscape features such as trees are also not mentioned. If these requirements were added to the policy, it would perform more positively.	<p>Policy GR3 and supporting text have been updated to include responding to the local and historic context following a representation from Historic England.</p> <p>The following amendments below are proposed:</p> <p>Policy GR3 Public Realm and Connecting Places</p> <p>Insert into Policy GR3A a. Respond to the <u>local and historic</u> context in which it is proposed to be located within</p> <p>Para 2.3.5</p>

Local Plan Policy	IIA objective	IIA effect	IIA recommendation	LHBC response
				Appropriate lighting should be provided, whilst ensuring that light and glare does not become a nuisance to nearby residential occupiers, <u>historic environment</u> or harmful to biodiversity in line with Policy GR7 (External Lighting).

B. Local Plan IIA Reg 19 recommendations and LHBC response /proposed changes for policies

Policy	Objective	IIA effect	IIA recommendations	Harrow Council Response and proposed changes prior Reg 19 consultation
GR1 Achieving a High Standard of Development	IIA4	Minor positive	Enhancements The policy could go further to encourage healthy developments to be delivered such as encouraging the incorporation of allotments/food growing, open space / greenspace, and mention connections via sustainable and active modes of transport, particularly in relation to the layout of developments.	<p>New text is proposed to be added to the supporting text of Policy SP01 to make it clear a HIA may be required for some development in line with the planning application validation requirements. The proposed amendment is included below:</p> <p>Proposed amendment: add new para 2.0.11 as below:</p> <p><u>New development must make positive a contribution to health improvement across the borough. Health Impact Assessments will be required for new development in line with the Harrow Planning Application Validation Requirements.</u></p> <p>The issue in relation to active travel, allotments/food growing, open spaces are already covered by other Local Plan policies (e.g. SP10.G12, G15)</p>
GR3	IIA3	Minor positive	Enhancements The policy could perform more positively if it specifically encouraged accessible access	The issues notes are covered by other policies in the Plan. A new policy GR3a: 'Inclusive Design' has been introduced into the Plan in response to IIA and other matters raised by consultation responses

			for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.	
GR3	IIA6	Minor positive	Enhancements The policy could perform more positively if it specifically encouraged accessible access for all, with dignity, and addressed any existing issues with accessibility in public spaces such as stepped access.	The issues are covered by other policies in the Plan, particularly the new policy GR3a has been included in relation to inclusive design.
GR3	IIA 7	Minor positive	Enhancements The policy could be improved with inclusion of requirements regarding the design of lighting of the public realm to ensure safety but also avoid unnecessary light pollution.	The issues noted are covered by other policies in the Plan. A new policy GR3b seeks to ensure the design of the public realm in developments supports the safety of visitors and residents and Policy GR7 already requires developments to submit a lighting strategy and measures to minimise any potential light pollution. There is no need to repeat/include cross reference to policies, as application will be determined in according to all the policies of the Plan and the Plan must be read as a whole.
GR3	IIA 8	Minor positive	Enhancements The policy could be improved with inclusion of requirements regarding the energy efficiency of public realm lighting.	Additional text was included in the supporting text of Policy GR7 in relation to the energy efficiency of external lighting in the public realm (para 2.7.7). Proposed amendment is included below: : <u>New lighting proposed as part of any new development should seek to ensure the use of energy efficient fixtures to assist with climate change and the requirements set out in Strategic Policy 08 (Responding to the Climate and Nature Emergency).</u>

				There is no need to repeat/include cross reference to policies, as application will be determined in according to all the policies of the Plan and the Plan must be read as a whole.
GR3	IIA11	Minor positive	Enhancements The policy does not mention the design of the public realm to respond specifically to the existing landscape/townscape character and local distinctiveness. Safeguarding landscape and townscape features such as trees is also not mentioned. If these requirements were added to the policy, it would perform more positively.	<p>New text was included within the supporting text of GR3 (para 2.3.2) to ensure all the factors mentioned are considered as part of the design process of the public realm in new development proposals.</p> <p>Proposed amendment to paragraph 2.3.2 is included below:</p> <p>The design of the public realm cannot be a one size fits all approach; it must provide a high-quality space suitable for the surrounding area and its users. <u>Whilst new public realm provides an opportunity to encourage new high-quality space, it should also respond to the existing landscape / townscape character of an area, picking up on local distinctiveness. Existing local characteristics that contribute to the understanding or appreciation of an area should be retained, including existing trees.</u> All new or enhanced public realm should be based on the guidance as set out Historic England's Streets for All – London (2018), and the Mayor's Healthy Streets Approach.</p>
HO1	IIA3/4	Minor positive	Enhancements The inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties could help to enhance the potential positive effect identified.	Part 4B of the policy has been updated to make it clear that lower floors of flats should be priorities for families and members who may have mobility issues (see above).
HO2	IIA 11	Minor positive	Enhancements The addition of explicit text which requires the consideration of the	This issue is addressed via other local Plan policies relating to the historic environment.

			local historic environment could help to further improve the score for IIA13.	<p>In response to issues raised in Historic England's representation and IIA, a new sentence was added to supporting text of Policy HO2, as below.</p> <p><u>In line with national and local policies (.i.e. SP2, HE1) relating to the historic environment, it will be important of proposals for the conversion/redevelopment of dwellings to include a high quality design scheme, materials that enhance, protects the significance of both designated (e.g. nationally Listed Buildings, conservation areas, etc), non-designated heritage assets (e.g. Local Areas of Special Character) and the their settings. Further, it should be noted a heritage impact assessment and listed building consent may be required on a case-by-case basis. The Council will give regard to the desirability of preserving listed buildings, the character and appearance of them, their setting and those features which make it special.</u></p>
SP 04:	IA5	Uncertain	<p>Mitigation</p> <p>The policy should expand on the benefits mixed use development schemes could bring to housing development.</p>	<p>This policy and other policies in chapter 5 already highlights the importance of mixed use and range of uses within town centre locations. It seeks to protect industrial employment floor space in line with national and London Plan policies, as well as evidence.</p> <p>Policy LE3 allows mixed development on non-designated industrial land and an amendment enables co location of residential uses in LSIS designations where a master plan has been agreed with the Council</p> <p>Amend Policy LE3. B.1 Co-location of residential within a LSIS will not only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority.</p>

M2 Parking	IIA4	Minor positive	Enhancement: Consideration of any equality issues that may exist in relation to parking.	The Plan has proposed to include a new policy GR3a in relation to inclusive design. The London Plan includes parking standards, including for those with disabilities
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C. Harrow Council review and response to Local IIA (Reg 19) recommendations for proposed allocations

NB: The Council did not provide a respond to any IIA enhancements recommendations for the proposed allocations, as they simplify referred to existing Local Plan Policies.

Site allocation	IIA Objective	IIA Score	IIA Assessment description of potential effects and mitigations	IIA Mitigation	Harrow Council response	Additional changes made prior Reg 19 consultation
OA3: College Road	IIA4: Health & Wellbeing	Uncertain	The site is located within walking distance of formal and informal recreation. The site is also not currently used as an allotment. No cycle routes are in proximity to the site, however Local Plan Policy M1 Sustainable Transport requires developments to support the delivery of new local cycle networks, as well as provide accessible cycle parking for all users. It is noted that the site currently includes a church, which would be lost through the development of the site. It is unclear if this could be proven as a facility no longer needed, in accordance with Local Plan Policy CI1: Social Infrastructure, or if this would need to be provided elsewhere - particularly given the	Further details of the site redevelopment could mitigate the uncertain effect identified. The Local Plan should consider retaining the church unless it is demonstrated that there is no need for it.	Policy CI1 seeks to retain, protect existing social infrastructure and includes a strict criterion for assessing potential losses. The allocation has been amended to ensure re-provision of Place of Worship as a supporting land use under allocated use.	Allocation has been amended to ensure re-provision of Place of Worship

			number of other sites proposed for development within Harrow Town Centre which could include residential development. Therefore, an uncertain effect has been recorded.			
GB1: RNOH	IIA3: Accessib ility	Significa nt Negative	In terms of accessibility, the site is located within walking distance of a primary school (1.1km), and formal recreation (100m). However, the site is not located within walking distance of a secondary school (1.6km), or a GP surgery (1.5km), suggesting inadequate accessibility to some local facilities and services. The site has a PTAL score of 1, suggesting that the site has significant accessibility issues to public transport. Therefore, a potential significant negative effect is identified.	The site should be required to make contributions to the development of accessible facilities and to improvements to the local public transport/ active travel network, either onsite or offsite.	The site is an existing hospital that is a nationally and internationally recognised institution that has been established in this location for some time. Given its existing location and the need for such infrastructure, it remains the only location for its use.	The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan
GB1: RNOH	IIA6: Sustaina ble Travel	Significa nt Negative	In terms of sustainable transport, the site is located more than 1km from Stanmore tube station and is classed as having a PTAL score of 1, suggesting that the site has significant accessibility issues to public transport. The site is also not in walking distance of a secondary school (1.6km), GP surgery (1.5km), or employment site (2.6km). The site is located	The site should be required to make contributions to improve to the local public transport and active travel network, either onsite or offsite	The site is an existing hospital that is a nationally and internationally recognised institution that has been established in this location for some time. Given its existing location and the need for such infrastructure, it remains the only location for its use.	The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy

			around 100m to an existing bus stop however and is within 1.1km walking distance of a primary. No cycle routes are in proximity to the site, however Local Plan Policy M1 Sustainable Transport requires developments to support the delivery of new local cycle networks, as well as provide accessible cycle parking for all users. Provision of these routes alongside development could help to increase opportunities for active travel. Therefore, a potential significant negative effect is identified.			and Local Implementation Plan
GB1: RNOH	IIA13: Soils and Water	Significant Negative	The site is not within a groundwater protection zone, and is more than 1000m to the nearest watercourse, suggesting that water pollution as a result of construction is unlikely. However, part of the site lies on agricultural land classified as 'Grade 3' and is partially greenfield land. Development on these areas of the site could subsequently lead to the permanent and irreversible loss of the best and most versatile agricultural land. The site also contains a number of historic landfill sites. Therefore, a potential	The loss of the best and most versatile agricultural land, and greenfield land, is permanent and irreversible and cannot be mitigated. The developments should be required to maintain 'openness' of these sites in order to	Any new development on the site would be on the previously developed areas of it, in accordance with the development plan and any other material considerations, including planning history for the site. The Allocation does seek to maintain 'openness' but recognises that it is a national / internationally renowned medical institution.	New development should also have regard to environmental constraints such as surrounding agricultural land, and any potential land contamination by way of historic landfill sites

			significant negative effect is identified.	minimise the potential negative effect of redevelopment on Green Belt / MOL sites.	Allocation to identify potential issues as noted.	
O10: Harrow View Telephone Exchange	IIA6: Sustainable Travel	Significant Negative	In terms of sustainable transport, the site is located 1km from Harrow and Wealdstone tube station and more than 800m from an existing bus stop and employment site. The site is subsequently classed as having a PTAL score of 1, suggesting that the site has significant accessibility issues to public transport. However, the site is within walking distance of a primary school (400m), a secondary school (1.2km) and a GP surgery (400m). No cycle routes are in proximity to the site, however Local Plan Policy M1 Sustainable Transport requires developments to support the delivery of new local cycle networks, as well as provide accessible cycle parking for all users. Provision of these routes alongside development could help to increase opportunities for active travel. Therefore, a potential	The site should be required to make contributions to improve to the local public transport and active travel network, either onsite or offsite.	In with the Local Plan Policies (e.g. Chapter 10 and 6), new development will be required to contribute towards the provision of new/enhanced active and public transport infrastructure, if it is necessary and viable.	The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan

			significant negative effect is identified.			
O14: Vernon Lodge	IIA6: Sustainable Travel	Minor Negative	Vernon Lodge is located within reasonable walking distance of some services such as recreation spaces and an allotment. However, most facilities such as formal recreation, GP surgeries are beyond an 800m walking distance. The site also has a PTAL score of 1b, indicating that although there is a nearby bus stop, a single service runs from here. Rail links are also beyond walking distance of the site. This could lead to some journeys being made via private car rather than active travel modes. Therefore, a potential minor negative effect is identified.	The site should be required to make contributions to improve to the local public transport and active travel network, either onsite or offsite	Any new development must contribute to sustainable transport improvements & supportive of measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan	The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan

The Council have considered the IIA recommendations in relation to monitoring the potential negative/uncertain effects, but no changes were proposed, as the Local Plan monitoring framework as this already addressed these.