

## **Matter 1: Legal Compliance and the Duty to Cooperate**

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

#### **Questions**

#### **2.4 Has the IIA tested all reasonable alternatives?**

The IIA has not produced reasonable alternatives especially in relation to the densification and site allocations of the already densely populated Opportunity Area. Why hasn't the option of spreading development across all ten transport hubs whilst maintaining a maximum height of six storeys not been modelled? Given that the Opportunity Area has already provided the majority of the Borough's housing in the past and has surpassed 5000 homes as stipulated in the London Plan and by the end of the plan has a revised target of 8750 and actual allocation above 9000 it cannot be expected to carry on doing so. How sustainable is this approach? Given that Harrow has larger than normal households, this will lead to overcrowding in a densely developed area. The impact of this would create great social and economic issues, hence more options alternatives should be explored. It is unclear whether the cumulative effects of developments which took place prior to the Plan period the proposed densification have been assessed.

Modelling of several options including those outside of the Opportunity Area could also have been provided to allow impact of options on townscape to be fully illustrated.

Additionally, no assessment was conducted for the Harrow & Wealdstone Opportunity Area's up to tall building's cumulative air quality impacts, despite being in the Air Quality Focus Area. This would have allowed to establish alternatives.

#### **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?**

In my response to question 2,4, I have raised concerns about lack of alternatives to distribute housing targets across the borough, I therefore think the reasons for discounting alternative sites are unclear as alternatives were insufficiently explored.

#### **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?**

The IIA has not fully addressed the issues brought about by densification. It has not tried to ensure the Plan truly delivers 'good growth'. The IDP shows that infrastructure is currently under strain, but the plan provided does not tackle the issues

comprehensively. In seeking to minimise adverse impacts of the Plan, should the IIA not interrogate the shortcomings in the IDP more? For instance the population of Marlborough is projected to double in 15 years, is there sufficient infrastructure delivery in the IDP (EBIT01) for double the current population.

Additionally, EBIT01 raised issues with electricity capacity and water supply, yet there are no responses from the Statutory Consultees. Given the issues raised in the IDP, has the Council tried to get responses from these consultees. Residents in the HA1 Area have experienced a number of power cuts in the past year.

Thames Water says there has been an omission in policy related to Sewer and Wastewater Management. Given that Thames water has said that there are issues with wastewater management infrastructure in the areas in the opportunity area, does the council not have a duty to address this?

The Environmental Agency has also suggested that the Harrow Surface Water Management Plan is out of date as it was conducted in 2011 and a new study is required. I have noted that the Council's response is that the study is not considered to impact the plan. Is the council not under obligation to use the most up to date evidence? Given that the report is 14 years old and most of the new flats in Harrow have been built in the past 10 years. Is using an outdated report not a failure to consider the cumulative effect of housing allocations on surface water management?

The Environment Agency also recommended that a Water Cycle Study be conducted the council has does not consider this necessary.

In terms of health facilities, the NHS has identified a missing policy requiring Large Developments to have a Health and Impact Assessment. Given this omission, is further work on the IIA required?

## **Conclusion**

My understanding is that the Local Plan is supposed to plan for good growth which maintains or improves the living standards of its residents, therefore performing an impact assessment on policies and site allocations is paramount to getting the Plan right. I do not believe the Integrated Impact Assessment (IIA) has achieved this as it has failed to test and to identify crucial adverse: environmental, social, economic, health impacts posed by the Draft Plan.

The IIA fails to explore sustainable alternatives to combat the issues posed by densification in the Opportunity Area.

Responses from Thames Water, Environmental Agency and NHS England also identified missing policies and evidence.

Statutory Consultees have not responded.

Therefore, I think the IIA is unsound.

The council can rectify this by:

Provide the evidence sought by Statutory Consultees and use it in assessing the impact of adding thousands of new residents to an already densely developed and densely populated area.