



London Borough of Harrow Council Local Plan

Integrated Impact Assessment Appendix C: Summary of Policy Alternatives Assessment

London Borough of Harrow Council

Harrow Council Hub, Forward Drive, Harrow, HA3 8FL

Prepared by:

SLR Consulting Limited

Registered Address: 1 Bartholomew Lane, London, United Kingdom EC2N 2AX

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Basis of Report

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1.0 Introduction

This appendix presents the findings of the reasonable alternatives to the Harrow Borough Local Plan Policies. The policies and alternatives assessed are listed in the left-hand column of each summary table. The summary tables contain the performance of reasonable policy alternatives (shown in purple colour and italics) alongside the preferred policies in order to allow comparison. Detailed assessment matrices of the alternative policies can be found within Appendix E.

For completeness, this appendix also presents the findings of new and modified policies included in the Regulation 19 Local Plan, as a result of changes made to the content of policies following Regulation 18 consultation (shown in red colour and italics). No reasonable alternatives to these new policies were identified. Detailed assessment matrices of the preferred policies can be found within Appendix D.

As a result of re-assessment, the following policies were amended:

- a) Policy GR3: Public Realm and Connecting Places (IIA10 amended from neutral to minor positive);
- b) Policy HE1: Historic Environment (IIA8 and IIA9 amended from neutral to minor positive);
- c) Policy HO6: Accommodation for Older People (IIA4 amended from minor positive to significant positive); and
- d) Strategic Policy 07: Green Infrastructure (IIA11 amended from neutral to minor positive).

Four new policies have also been added to the Local Plan, and subsequently assessed:

- Policy GR3A: Inclusive Design;
- Policy GR3B: Safety, Security and Resilience to Hazards;
- Policy GR4A: Basement Development; and
- Policy GR12: Site Allocations.

This appendix has also been updated to reflect the Inspector's proposed main modifications following Examination hearings in June-October 2025. No new policies have been included within the modified Local Plan. Policy CE2: Design to Support the Circular Economy and Policy GR6 Strategic Areas of Special Landscape Character have been removed from the Local Plan (and therefore this appendix) and the following changes made with regards to the choice of preferred policy options:

- An additional preferred alternative for **Policy HO1: Dwelling size mix** has been identified and selected by the Inspector. This preferred policy has been subject to IIA, the findings of which can be found within Section 6.2 of this appendix and within Section 7.5 of the main IIA Report.
- For **Policy GI3: Biodiversity**, the previously rejected alternative to this policy (to include a requirement for 10% biodiversity net gain to align with the Environment Act) has been selected by the Inspector and the previously preferred policy (to include a requirement for 15% biodiversity net gain) has been rejected.

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

Table C1-1: Key to Sustainability Significance Scores

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

A discussion of the performance of the reasonable alternatives within each chapter is provided under Section 6 of the IIA Report. The alternatives assessed are detailed within Section 10 of this Appendix.

2.0 Defining the Spatial Strategy Reasonable Alternatives

The table below provides a justification for the identification of the spatial strategy reasonable alternatives.

Table C2-1: 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 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 1 Current spatial strategy – growth directed to H&W Opportunity Area	Reasonable alternative. This spatial strategy option could accommodate this lower housing 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.	This is not considered a reasonable alternative because the current spatial strategy 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.	Is this option not reasonable because there is not enough sites / space to deliver it 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: 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	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	Reasonable alternative

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)
	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).	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).	

3.0 Performance of Spatial Strategy Alternatives

Table C3-1: Summary of Spatial Strategy Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Spatial Strategy	++	+	+	+	++	++	+	+	0	+	+	+	+	+
<i>Spatial Strategy: Alternative 1</i>	++	+	+	+	++	++	0	0	0	+	+	++	+	+
<i>Spatial Strategy: Alternative 2</i>	++	+	+	+	++	++	+	+	0	--	--	--	--	0

4.0 Performance of High Quality Growth Alternatives

Table C4-1: Summary of High Quality Growth Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
<i>GR3 Public Realm and Connecting Places</i>	0	0	+	+	0	+	+	+	+	+	+	+	0	0
<i>GR3A Inclusive Design</i>	0	0	++	+	+	+	0	0	0	0	+	0	0	0
<i>GR3B Safety, Security and Resilience to Hazards</i>	0	0	0	+	0	0	0	0	0	0	0	0	0	0
<i>GR4A Basement Development</i>	0	0	0	+	+	0	0	0	+	+	+	0	+	0
GR10 Development on Infill and backland sites, garage sites, garden land and non-designated open spaces	0	0	0	+	+	0	0	0	0	0	0	+	0	0

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
<i>GR10 Development on Infill and backland sites, garage sites, garden land and non-designated open spaces: Alternative 1</i>	0	0	0	-	+	0	0	0	0	0	0	-	0	0
<i>GR10 Development on Infill and backland sites, garage sites, garden land and non-designated open spaces: Alternative 2</i>	0	0	?	+	?	?	0	0	0	+	0	--	0	+
<i>GR12 Site Allocations</i>	0	0	+	0	++	+	0	0	0	0	0	+	0	0

5.0 Performance of Heritage Alternatives

Table C5-1: Summary of Heritage Alternative Assessments

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

6.0 Performance of Housing Alternatives

6.1 Strategic Policy 03: Meeting Harrow's Housing Needs

Table C6-1: Summary of Strategic Policy 03 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 03: Meeting Harrow's Housing Needs	+	0	+	+	++	+	?	0	0	0	0	-	+	0
Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 1	?	0	+	+	?	?	?	-	-	--	?	--	--	0
Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 2	+	0	+	0	--	+	-	0	0	0	0	-	+	0

6.2 Policy HO1 Dwelling Size Mix

Table C6-2: Summary of Policy HO1 Alternatives Assessment

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO1 Dwelling Size Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
HO1 Dwelling Size Mix: Alternative 1	0	0	+	+	-	+	0	0	0	0	+	+	0	0
HO1 Dwelling Size Mix: Alternative 2	0	0	+	+	-	+	0	0	0	0	+	+	0	0
HO1 Dwelling Size Mix: Alternative 3	0	0	+	+	?	+	0	0	0	0	+	+	0	0
HO1 Dwelling Size Mix: Alternative 4	0	0	+	+	?	+	0	0	0	0	+	+	0	0
HO1 Dwelling Size Mix: Alternative 5	0	0	+	+	++	+	0	0	0	0	+	+	0	0

6.3 Policy HO2 Conversion and Redevelopment of Larger Dwellings

Table C6-3: Summary of Policy HO2 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO2 Conversion and Redevelopment of Larger Dwellings	0	0	+	+	++	+	+	+	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 1</i>	0	0	0	+	?	0	+	0	0	0	0	0	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 2</i>	0	0	+	?	?	+	+	+	0	0	+	?	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 3</i>	0	0	+	-	?	+	+	+	0	0	+	+	+	+
<i>HO2 Conversion and</i>	0	0	-	-	++	-	-	?	0	0	+	+	+	+

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
<i>Redevelopment of Larger Dwellings: Alternative 4</i>														
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 5</i>	0	0	+	+	--	+	+	0	0	0	--	--	+	-
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 6</i>	0	0	?	?	++	?	+	0	0	0	+	+	+	+

6.4 Policy HO4 Genuinely Affordable Housing

Table C6-4: Summary of Policy HO4 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO4 Genuinely Affordable Housing	0	+	0	0	++	0	0	0	0	0	0	0	+	0
<i>Policy HO4 Genuinely Affordable Housing: Alternative 1</i>	0	+	0	0	+	0	0	0	0	0	0	0	+	0

6.5 Policy HO5 Housing Estate Renewal and Regeneration

Table C6-5: Summary of Policy HO5 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO5 Housing Estate Renewal and Regeneration	0	0	0	++	++	++	0	+	0	0	0	+	+	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 1</i>	0	0	?	++	?	0	0	0	0	0	0	0	0	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 2</i>	0	0	?	?	?	++	0	+	0	+	0	+	+	0

6.6 Policy HO6 Accommodation for Older People

Table C6-6: Summary of HO6 Policy Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
<i>Policy HO6 Accommodation for Older People</i>	0	0	++	+	++	+	0	+	0	0	0	0	0	0
<i>Policy HO6 Accommodation for Older People: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0
<i>Policy HO6 Accommodation for Older People: Alternative 2</i>	0	0	?	?	++	?	0	?	0	0	0	0	0	0
<i>Policy HO6 Accommodation for Older People: Alternative 3</i>	0	0	+	+	?	+	0	+	0	0	0	0	0	0

6.7 Policy HO7 Supported and Sheltered Housing

Table C6-7: Summary of HO7 Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO7 Supported and Sheltered Housing	0	0	++	+	+	+	0	0	0	0	0	0	+	0
<i>Policy HO7: Supported and Sheltered Housing: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0

6.8 Policy HO8 Purpose Built Student Accommodation

Table C6-8: Summary of Policy HO8 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO8 Purpose Built Student Accommodation	+	0	+	+	-	+	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 1</i>	0	0	-	-	-	-	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 2</i>	+	0	+	-	-	+	-	0	0	0	0	0	0	0

6.9 Policy HO9 Large Scale Purpose Built Shared Living

Table C6-9: Summary of Policy HO9 Alternatives Assessment

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO9 Large Scale Purpose Built Shared Living	+	+	+	+	+	+	0	+	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 1</i>	-	-	0	-	-	?	0	0	0	0	0	-	0	-
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 2</i>	+	+	+	+	-	+	0	0	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 3</i>	+	+	+	+	?	+	0	0	0	0	0	-	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 4</i>	+	+	?	+	?	+	0	0	0	0	0	-	0	+

6.10 Policy HO10 Housing with shared facilities (Houses in Multiple Occupation)

Table C6-10: Summary of Policy HO10 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO10 Housing with shared facilities (Houses in Multiple Occupation)	0	0	+	+	++	+	0	+	+	+	0	+	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1	0	0	+	0	-	+	0	+	0	0	0	?	0	-
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2	0	0	+	+	--	+	0	0	+	+	0	-	0	+
HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3	0	0	+	+	-	+	0	0	+	+	0	-	0	+
HO10 Housing with shared facilities	0	0	-	+	-	+	0	0	+	+	0	-	0	+

Policy	IIA Objective													
(Houses in Multiple Occupation): Alternative 4														

6.11 Policy HO12 Gypsy and Traveller Accommodation Needs

Table C6-11: Summary of Policy HO12 Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO12 Gypsy and Traveller Accommodation Needs	0	0	+	+	+	+	0	0	+	+	0	+	+	+
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 1¹</i>	0	0	?	--	-	?	0	0	+	?	0	-	0	0
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 2</i>	0	0	--	--	--	+	0	0	+	+	0	+	+	+

¹ The Government included a revised wider definition for gypsies and travellers in the updated NPPF. The Council will consider the potential implications of this based on the GLA London wide GTANA that is expected to be published during 2024.

7.0 Performance of Local Economy Alternatives

Table C7-1: Summary of Local Economy Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
LE1 Development Principles and Town Centre Hierarchy	++	+	+	+	?	+	+	0	0	0	0	+	0	+
<i>LE1 Development Principles and Town Centre Hierarchy: Alternative 1</i>	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE3 Industrial Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 1</i>	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 2</i>	?	+	0	0	+	+	0	+	0	0	0	0	0	+

8.0 Performance of Green Infrastructure Alternatives

Table C8-1: Summary of Green Infrastructure Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
<i>Strategic Policy 07: Green Infrastructure</i>	0	0	0	+	0	0	+	0	+	+	+	+	+	0
GI2 Open Space	0	0	+	+	0	0	0	0	+	+	0	0	0	0
<i>GI2 Open Space: Alternative 1</i>	0	0	0	+	0	0	0	0	+	+	0	0	0	0
GI3 Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
<i>GI3 Biodiversity: Alternative 1</i>	0	0	0	+	0	0	0	0	+	++	+	0	+	0

9.0 Performance of Climate and Nature Alternatives

Table C9-1: Summary of Climate and Nature Alternative Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	++	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 1</i>	+	+	0	+	+	0	0	--	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 2</i>	+	+	0	+	0	0	0	+	+	+	+	+	0	0

10.0 Alternatives Assessed

This section details the policy alternatives which have been assessed. Not all policies have an identified alternative/s.

The wording of the preferred policies can be found within the Regulation 19 version of the Local Plan along with the Inspector's proposed modifications. The modified policies have been screened to identify wording that required re-assessment through the IIA. The up-to-date assessments of the preferred policies are reflected in the previous sections of this report and within the detailed assessment matrices in Appendix D.

Chapter 01: Spatial Vision and Strategy and Strategic Objectives

Reasonable Alternatives

Alternative 1: Retain existing spatial strategy – The Harrow Core Strategy (2012) spatial strategy seeks to deliver 12,829 new homes and 4,000 additional jobs (2015-25). The primary focus of growth is within the Harrow Wealdstone Intensification Area (i.e. 2,800 homes and 3,000 jobs), to enable good access to local facilities and services, including public transport, as well as enable the delivery of new/enhanced supporting infrastructure.

The secondary focus of growth is to promote development sites within and on the edges of existing district and local centres, to address local needs and promote their vitality/viability. It seeks to ensure development delivers the regeneration of the centres, via improving the public realm.

The spatial strategy also seeks to support the re-development/ intensification of strategic brownfield suburban sites and regeneration areas (e.g. Council estates) outside the above locations, to deliver additional housing and enable the delivery of new/enhanced supporting infrastructure, as well as to help address deprivation. Most of these areas/sites may have been developed since the adoption of the existing Local Plan.

In addition, this spatial strategy seeks to maintain the existing supply of employment floor space, protect/enhance the Boroughs Green Belt, MOL and open spaces and special character areas, and the character of suburban locations, heritage assets and historic environment.

Alternative 2: Strategy which delivers a higher level of development than identified in the proposed strategy– This spatial strategy would accommodate a higher level of growth than the minimum housing targets set for Harrow in the London Plan 2021, and beyond the Objectively Assessed Need for employment, retail and cultural / leisure floorspace and infrastructure capacity . Such an approach would meet a greater proportion of the Borough's Objectively Assessed for housing (as calculated by the Government's Standard Methodology or the housing growth requirement of 24,266 units identified by the Local Housing Needs Assessment).

In line with the London Plan 2021 this would require the Council to explore all options for accommodating housing growth on previously developed sites within the existing built-up areas of the Borough. This would prioritise accommodating a higher proportion of housing within the Harrow and Wealdstone Opportunity Area, followed by sites within and on the edge of town centres (particularly the larger centres), small sites within locations with good accessibility (PTAL 3-6), sites within proximity (800m) to larger town centres, railway/tube stations, and other locations (i.e. the preferred spatial strategy).

However, this spatial strategy would also require developing green field / Green Belt / Metropolitan Open Land sites, employment land, sites in less sustainable locations within the boroughs, or at densities and heights significantly above the predominantly suburban nature

of most of the borough. Such an approach would risk being contrary to the evidence base informing the Local Plan (such as the need to retain open space and employment land, the Characterisation study of the borough, or NPPF / London Plan requirements relating to Green Belt / MOL). This spatial strategy would contribute to closing the gap between the minimum London Plan housing targets for the Borough and the actual Objectively Assessed Needs identified by the standard methodology.

Chapter 02: High Quality Growth

Strategic Policy 01: High Quality Growth – no reasonable alternatives identified.

Policy GR1: Achieving a High Standard of Development – no reasonable alternatives identified.

Policy GR2: Inclusive Neighbourhoods – no reasonable alternatives identified.

Policy GR3: Public Realm and Connecting Places – no reasonable alternatives identified.

Policy GR3A: Inclusive Design- no reasonable alternatives identified.

Policy GR3B: Safety, Security and Resilience to Hazards- no reasonable alternatives identified.

Policy GR4: Building Heights – no reasonable alternatives identified.

Policy GR4A: Basement Development- no reasonable alternatives identified.

Policy GR5 View Management – no reasonable alternatives identified.

Policy GR7: External Lighting – no reasonable alternatives identified.

Policy GR8: Shopfronts & Forecourts – no reasonable alternatives identified.

GR9: Outdoor advertisements, digital displays and hoardings - no reasonable alternatives identified.

Policy GR10: Development on Infill and backland sites, garage sites, garden land and non-designated open spaces: – two reasonable alternatives identified.

Alternative 1 - No Policy Option: This would impact on the Council's ability to set out expectations for development and protect the character and amenity of the Borough, particularly in the predominately suburban areas that are a key characteristic of the borough. Consequently, this alternative is not the Council's preferred option.

Alternative 2 - More permissive policy: The Strategic Housing Policy 03 identifies the amount of housing required, and where this is being strategically directed to, which is within the Harrow & Wealdstone Opportunity Area (a minimum of 7,500 dwellings). By strategically directing growth to the most sustainable location within the borough, there would be less requirement to deliver housing within suburban Harrow which would contribute to retaining its low-density, suburban character. A reasonable alternative would however be to include a more permissive policy. This however is not the Council's preferred option as such a policy could result in an inconsistency with overarching approach to direct growth to the most sustainable location within the borough (the Opportunity Area), and area capable to accommodate the most change in the borough having regard to matters such as prevailing character and building heights, and site availability). Furthermore, a more permissive policy may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to a significant amount of change that an overly permissive policy may result in.

Policy GR11: Planning Obligations – no reasonable alternatives identified.

Policy GR12: Site Allocations – no reasonable alternatives identified.

Chapter 03: Heritage

Strategic Policy 02: Heritage – no reasonable alternatives identified.

HE1 Heritage Assets – no reasonable alternatives identified.

HE2 Enabling Development – no reasonable alternatives identified.

Chapter 04: Housing

Strategic Policy 03: Meeting Harrow's Housing Needs – Two Reasonable Alternatives Identified.

Alternative 1: High housing growth

This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2021-41 based on the demographic led approach utilised by the Draft Local Housing Needs Assessment. This is based on 2018 household and population projections and considers factors such as household sizes, mortality, migration, and past suppressed household formation rates of those under 45 years of age.

This approach is not considered the preferred option due to a number of factors. The London Plan (2021) sets a Borough ten-year target of 8020 homes (2019-29) and indicates a target beyond this period should be based on evidence of capacity. Housing monitoring data indicates a total of 8,410 homes were delivered between 2009/10- 2020/21 (i.e. average of 841), which means it is likely to be difficult for the Borough to increase delivery of housing on previously developed sites to meet this within the existing urban area, beyond the London Plan target. This option is likely to require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach. There is a high risk that an insufficient level of housing sites may be submitted for permission and come forward for development in a timely manner to meet the annual target and make it difficult to maintain a five-year land supply of deliverable sites and meet the housing delivery test. This would mean the national policy of presumption in favour of sustainable development would apply, which means the Council would find it more difficult to refuse applications for new housing developments, even though they may be of a poor design, location or fail to meet local needs, or have a harmful impact on the natural/historic environment. This is likely to undermine the Plan led system and the promotion of sustainable development.

Alternative 2 Low housing growth: Stepped trajectory over a fifteen-year plan period

This would be based on the London Plan ten-year housing deliver target of 8020 homes (2019-29) and the need beyond this period would be based on the 2017 London SHLAA. This would comprise of the indicative capacity of large sites of 921 homes (phases 4: 2029-34) and 138 homes (phases 5:2034 -41), plus the London Plan small sites allowance of 3750 homes (10 years), all of which would total 4809 homes. Therefore, this approach results in a total housing requirement of 12,829 homes over a 20-year period (2021 -41). This assumes a higher housing requirement/need of 802 homes per annum over the first ten years (2019-29) and a lower need of 481 homes per annum during the final phases of the Plan. It should be noted the NPPF requires Plans to cover a 15-year period from the date of adoption.

The key advantages of option 2 are it may help address housing needs of the Borough in the early years of the Plan period, but there is uncertainty in relation to whether this may result in the delivery of the right size, tenure of housing (i.e. affordable and family) to address local needs, as a large proportion of the target will have been already met by existing permissions, constructions and completions, prior to the Plan being adopted. It may also

have less of a potential impact on the infrastructure capacity, natural and historic environment.

This approach is not considered the preferred option, as it would fail to address the acute housing needs of the Borough, particularly for family and affordable housing. The London Plan (2021) states that any capacity beyond 2029 “should draw on the London 2017 SHLAA findings and any local evidence of identified capacity”. Therefore, the housing requirement/target will need to be based on updated local evidence of the housing capacity of the Borough. Further, this option will be highly reliant on windfall housing sites to come forward for development during the final phases of the Plan. This will undermine the Plan led system, make it more difficult for the Council to refuse both poorly designed, and poorly located proposals and to ensure proposals will address local needs, secure and deliver the supporting infrastructure and promote sustainable development.

Policy HO1: Dwelling Size Mix – five reasonable alternatives Identified.

Alternative 1: Continue with existing policy DM 24 Housing mix

This is highly permissive. It seeks to ensure mixed and inclusive communities. The mix is determined by target mix for affordable housing, the need to increase delivery of affordable housing, site location, character of surroundings and the need to optimise housing output on previously developed land site. This policy provides no specific requirements for the size of units required for market housing that will form a significant proportion of future housing delivery and will reduce the scope of the Council to secure a higher proportion of larger dwellings or medium sized accommodation that are suitable for addressing the needs of families. This policy is not considered the preferred option, as it is likely to result in the delivery of a larger level of smaller units that will not assist in delivering against the evidenced needs of the borough as set out in the Draft LHNA.

Alternative 2: Do not include a target to that seeks to ensure 25% of housing delivered on a scheme are family sized dwellings (i.e. three bed or more)

This approach is not considered the preferred option, as it is likely to reduce the level of family sized dwellings delivered. Key reasons are, it would reduce Councils scope to require a higher proportion of family or medium sized dwellings that are suitable for families, as well require applicants to provide evidence they have considered this. This is likely to encourage developers to build at higher densities and increase the number of smaller units, to maximise development value. Further, this would be contrary to the good planning practice of assessing the effectiveness of policy via the plan, monitor and manage approach.

Alternative 3: Include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing

The Draft LHNA indicates there is a significant need to increase the delivery of family housing. This indicates 70% of all future housing delivered should be three bed (or more) family dwellings, based on a requirement/target of 16,040 homes during the Plan period. This approach to set a target to deliver family housing in excess of 25% is not considered the preferred option, as there is need to achieve a balance between a set of competing factors such as; the type of sites that are likely to come forward for development, their locations; the need to optimise output of sites to increase the delivery of housing to meet future needs; as well as ensure the deliverability of sites. Further, the Council's Annual Monitoring Report indicates that the Borough had difficulties in achieving a target of ensuring 25% of all housing are family sized housing during the previous Plan period.

Alternative 4: Do not apply 25% family housing target to minor development

This approach is not considered the preferred option, as the London Plan anticipates that 47% of the Borough's future housing supply will come forward from small sites (below

0.25h). Therefore, this will reduce the Council's scope to increase provision of family housing from all the sites that come forward for development and address local needs.

Alternative 5: Include a target of 25% for the proportion of housing on a scheme that should be for family housing this was previously the preferred policy option in the Regulation 18 and 19 versions of the Local Plan.

Policy HO2: Conversion and redevelopment of larger dwellings - six reasonable alternatives identified.

Alternative 1: Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).

The existing policy generally permits proposals for the conversion of houses to multiple flats, provided they are well designed. The advantages of this are; it may increase the delivery of housing and help meet both the London Plan small sites and Local Plan housing target, as well as help demonstrate a five-year land supply of deliverable sites. Further, the potential impact on the character of the Borough is uncertain, as it could potentially spread them across the area or result in impacts being concentrated to a specific area. However to date this has not been identified as a significant problem.

The disadvantages of this approach are; it may result in the continued loss of family housing, which are required to address the future housing needs of the Borough. It is difficult to re-provide any family housing that is lost via conversions through new development elsewhere, as new residential developments may consist of high-density schemes close to/within town centres/stations. Further disadvantages are it may result in the loss of smaller sized, housing (i.e. below 130 sqm) that are more affordable and may result in the delivery of poorly designed flats. This approach is not considered the preferred option.

Alternative 2: Policy should not include a minimum 130m² size threshold for the conversion/redevelopment of homes into flats.

The advantages of this are; it may increase the delivery of a higher level of residential units, to help meet housing targets (including small sites) and ensure a five-year land supply of deliverable housing sites.

The disadvantages are; it may result in; a higher level of loss of family homes, specifically smaller, more affordable stock poorly designed homes, if smaller units below 130m² are converted. It may result in the delivery of a higher level of smaller 1/2 bed flats, even though there is a higher need to deliver family housing of 3 beds or more. It may potentially have a greater negative impact on the character of the area In terms of smaller original homes not being able to accommodate all the ancillary infrastructure (bins / cycle etc). This approach is not considered the preferred option..

Alternative 3: Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m² capable of providing a three-bed unit with access to a garden.

The potential effects of this policy may be similar to option 1. This approach is not considered the preferred option.

Alternative 4: Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6

The potential advantages of this are; it has the potential of increasing the amount of housing units delivered on , to meet the housing target and demonstrate a deliverable supply of housing sites to meet the five-year land supply.

The potential disadvantages of this are; it may result in the increased loss of family housing (.i.e. policy not only apply in PTAL 3-6) and as it may result in conversions in more locations of the Borough. This may have an uncertain impact on the character of the Borough, depending on whether more conversions are implemented within certain locations or not. This approach is not considered the preferred option.

Alternative 5: The proposed housing conversions policy should not apply to demolitions of a larger family sized home.

The points raised for option 2 above apply to this option. Overall, this is likely to result in the net loss of family housing. This approach is not considered the preferred option.

Alternative 6: Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map

The potential positive impacts of this approach are; it could provide clarity for all stakeholders in relation to which areas of the Borough are appropriate for housing conversions to flats; identify, assess the potential adverse impacts and sets out policy measures to address these.

The potential negative impacts of this are; it may be difficult to clearly identify, assess the areas where the conversion policy should apply (or not) and formulating evidence to support this may be a time-consuming exercise. There is a risk that this approach may be contrary to the London Plan Small Sites Policy that supports the incremental intensification of existing residential areas of existing residential areas. This approach is not considered the preferred option.

Policy HO3: Optimising the use of small housing sites – no reasonable alternatives identified.

Policy HO4: Genuinely affordable housing – one reasonable alternative identified

Alternative 1: To put a greater emphasis on intermediate products. The current split seeks to meet priority affordable needs as identified in the Draft Local Housing Needs Assessment (LHNA), but also allow for mixed communities by encouraging the provision of some intermediate products. The LHNA shows that intermediate products are essentially the least affordable of all the tenures to address the housing needs of local residents. Intermediate products are more likely to be occupied by people who have a choice within the market for alternative accommodation, e.g. market rent. Given the number of people who are homeless/ in temporary accommodation, living in overcrowded housing, an increase in intermediate proportions is not considered the preferred option.

Policy HO5: Housing Estate renewal and regeneration – two reasonable alternatives identified.

Alternative 1: Alternative approach would be no policy

The NPPF / London Plan is silent on the some or all of the matters covered by the proposed Local Plan policy, meaning there would be limited guidance to determine planning applications against, impacting upon the effectiveness of the Plan. This approach is not considered the preferred option.

Alternative 2: Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).

There is a deficiency in accessible open space (external amenity space) within certain parts of the Borough. Many of the Borough estates include designated open space and proposals should seek to ensure, there is no net loss in existing open space provision and where possible seek to meet any standards in relation to the quantity and quantity of provisions. But the potential policy option of ensuring no net loss in existing open space provision (.i.e.

no flexibility based on compliance with a criteria) may have adverse impact on the delivery of a higher quality provision, with a range of recreational facilities and the delivery of other planning benefits (e.g. addressing priority housing needs, community needs), as well as may have some impact on the design quality of the scheme and in rare instances the potential deliverability of schemes (e.g. lower housing output). Due to these factors, option 2 was not considered the preferred option.

Policy HO6: Accommodation for older people– three reasonable alternatives identified.

Alternative 1: Continue existing Local Plan policy approach (DM 29)

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. Applying this option is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, tenure older person accommodation, with a sufficient level of care/support, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

Alternative 2: Support proposals within/edge of town centres (excluding neighbourhood centres)

This approach is not considered the preferred option, as some of the town centres have a low public transport accessibility rating score, particularly those located to the north of the Borough. Therefore, although older residents may be able to access local services facilities, there is a potential risk this option may result in poor access to public transport and result in social isolation of older people from friends, families or experience difficulties accessing essential services like health care.

Alternative 3: Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period

This approach is not considered the preferred option, as the Draft Local Housing Needs Assessment indicates that the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information, in addition to the indicative benchmark figure for older people accommodation (within C3 use) included within the former policy. Further, the Plan seeks address older people accommodation needs primarily via the delivery of conventional C3 housing that are well designed to meet the changing needs of the occupants throughout the lives. There is a risk that the potential inclusion of a higher target for older people accommodation may undermine the Council's ability to meet other priority housing needs such as family housing and affordable housing.

Policy HO7: Supported and sheltered housing– one reasonable alternative identified.

Alternative 1: Continue existing Local Plan policy approach (DM 29)

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. This approach is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, accommodation, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, with adequate level of care/support to cater for the needs of vulnerable individuals/groups and are well located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

Policy HO8: Purpose built student accommodation— two reasonable alternatives identified.

Alternative 1: No Policy. This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policy for determining proposals. This will give the Council less control to promote good design, ensure development is located within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

Alternative 2: Allow PBSA schemes within accessible locations with PTAL 3-6

This approach is not considered the preferred option, as PBSA tend to be large scale and may adversely impact the character of residential areas. It may result in the loss of family sized housing areas, if clusters of student accommodation occur in areas where PBSA scheme is located/close to it and may result in other harmful amenity impacts on neighbouring properties.

Policy HO9: Large Scale purpose built shared living— four reasonable alternatives identified.

Alternative 1: No Policy. This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policies for determining proposals. This will give the Council less control to promote development within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

Alternative 2: Do not require applicants to demonstrate a need for LSPBSL

Although, this approach may provide developers with more scope to determine the type of housing products that should be provided on their site to address a perceived demand in the local housing market, but it will provide less of an incentive to ensure a local housing need is being addressed. Conversely, it will make it more difficult for the Council to require developers to ensure their scheme is addressing the priority needs of the area, which are conventional self-contained C3 housing, particularly affordable housing and family sized dwellings. Further, LSPBSL products tend to be less affordable than other products in the private rental sector and there is uncertainty on the extent to which it may help other issues such as overcrowded housing, under-occupation and freeing up the stock of family sized housing (e.g. properties in HMOs). The NPPF requires Plans to boost the supply of housing of the right, types, size, tenure in order to address the needs of groups with specific housing requirements (para 60, 62). This approach is not considered the preferred option.

Alternative 3: Allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6

This approach is not considered the preferred option, even though there are small parts of other town centres within the Borough fall within PTAL 5-6 and Edgware is a Major Town centre. The key reasons are LSPBSL schemes need to be built at a high density, with more than four to five storey height, in order to provide a sufficient quantity of communal facilities, manage/maintain the property at a satisfactory level and maintain viability of it. Whilst the character of the Borough comprises of two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs. This means significant parts of the Borough are unlikely to be suitable for LSPBSL schemes due to the potential impact on the character of the area and the need for economies of scale to apply to ensure viability.

Alternative 4: Do not include distance test for assessing over concentration of LSPBSL

This approach is not considered the preferred option, as it will make it more difficult to assess, prevent the potential over concentration of the LSPBSL schemes within a given locality, as well as minimise any potential related impacts on residential amenities, the diversity and mixed of uses and the objective of promoting mixed and inclusive communities. A related issue is that this option may undermine the delivery of conventional self-contained residential accommodation and address the priority local housing needs (i.e. family sized dwellings, affordable housing). However, the policy includes some flexibility to consider proposals that may be contrary to this requirement, in exceptional circumstances

Policy HO10: Housing with shared facilities (Houses in Multiple Occupation) – four reasonable alternatives identified.

Alternative 1: Continue to apply existing policy (DM30)

The adopted Local Plan Development Management (2013) Policy DM 30 is considered highly permissive for HMO/hostel proposals. It includes a generic criterion requiring proposals to demonstrate; good accessibility to local facilities, compliance with accessible homes standards and satisfactory living conditions and no adverse amenity impacts. Although this option may help in providing a relatively affordable stock of accommodation the continued use of this is considered inappropriate. The key reasons are; it is open to wide interpretation by all stakeholders and does not reflect the most up to date evidence of need. Further, the use of this will make it difficult for the Council to prevent the overconcentration of HMO's and the potential harmful amenity impacts of these, as well as encourage well designed living environments for residents, prevent the loss of family housing and ensure HMOs are located within the most accessible locations. This approach is not considered the preferred option.

Alternative 2: Allow conversion of family houses to HMOs (i.e. no consideration of the houses internal floor area (130m²) and the character of the area)

This approach is not considered the preferred option, as it will result in the potential loss housing that is suitable for families, including the stock of smaller housing that may be more affordable for low income or younger households. It is difficult to replace the loss of family sized housing due to the type, location of sites that are likely to come forward for development. Further, the change of use of smaller housing (below 130) may result in a poorly designed living environment for the HMO occupants.

Alternative 3: Allow HMOS within accessible locations with a PTAL 3-6

This approach is not considered the preferred option, as this may have an adverse impact on the character and harm the amenities of areas characterised by family housing, as well as increase the potential loss of family housing.

Alternative 4: Do not include a specific measure to assess the over concentration of HMO's

This approach is not considered the preferred option, as it won't allow the Council to assess or prevent the potential over concentration of the HMOS schemes within an area, as well as minimise any potential cumulative related impacts on residential amenities, and achieve mixed and inclusive communities. A related issue is that this may reduce the stock of family sized housing accommodation, which is difficult to provide via new development, which tends to be high density due to location of previously developed sites (i.e. close to town centres) and their high land values. This may result in families residing in unsuitable, overcrowded accommodation or in poor locations that are at a distance from their social networks and local services/facilities (i.e. schools).

Policy HO11: Self-build and Custom build housing – no reasonable alternatives identified.

Policy HO12: Gypsy and traveller accommodation– two reasonable alternatives identified.

Alternative 1: No policy

This approach is not considered the preferred option, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Traveller Sites. This would also mean that the Council would be less able to manage new accommodation as planning applications would be judged against national planning policy rather than locally specific policy criteria.

Alternative 2: Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015)

Chapter 05: Local Economy

Strategic Policy 04: Local Economy – no reasonable alternatives identified.

Strategic Policy 05: Harrow & Wealdstone Opportunity Area – no reasonable alternatives identified.

Policy LE1 Development Principles & Town Centre Hierarchy– one reasonable alternative identified.

Alternative 1: Less restrictive policy. An alternative policy for LE1 could be a 'laissez-faire' approach, which would be not seek to control or protect main town centre uses, rather leaving the market to determine the appropriate mix is uses within the town centres. However, failing to manage and ensure appropriate main town centre uses may detrimentally impact on the vitality and vibrancy of town centres, which is one of the key outcomes sought by the Local Plan. Such approach is therefore not the preferred option. An alternative that was considered was for Policy LE1 to seek to provide a more restrictive approach to town centre uses (than that proposed), similar to the current local plan policy, requiring a percentage cap of non-retail uses within the town centres / shopping parades. This could also include ensuring that there would not be more than three non-retail units in a row. However, by reason of the introduction of new Use Class Order (September 2020) and the new E Use Class incorporated a number of previously separate use classes there is a much wider number of uses that are able to changed from retail, without the need for planning permission (ie; does not constitute development and therefore any restrictive policy would not apply). As such, seeking to control the proportion of specific uses in town centres (rather than the preferred approach of focusing on outcomes such as the contribution of a proposal (where permission is required) to vibrancy and vitality would not be deliverable within a local plan policy. This is therefore not a reasonable alternative.

Policy LE2 Night-time and Evening Economy – no reasonable alternatives identified.

Policy LE3 Industrial Land – two reasonable alternatives identified.

Alternative 1 – allow for the full range of appropriate industrial uses: An alternative policy could be to allow for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites. By reason of the limited industrial floorspace within LB Harrow, such an approach is not the preferred option as this would mean uses that could occur elsewhere in the borough without adverse impacts would instead occur on the borough's limited amount

of industrial land, at the opportunity cost of industrial uses that are more appropriately located on designated industrial land.

Alternative 2 – allow for co-location: An alternative policy approach may be to allow for the co-location of housing on Local Strategic Industrial Sites, which is set out as appropriate (subject to process) within the London Plan (2021). By reason of the limited industrial floorspace within LB Harrow, which evidence suggests stock should be maintained to ensure a sufficient amount, and the forecasted ability to meet housing targets without requiring such an option. Co-location of residential within a LSIS will only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority.

Policy LE4 Culture and Creative Industries – no reasonable alternatives identified.

Policy LE5 Tourism and Visitor Accommodation – no reasonable alternatives identified.

Chapter 06: Community Infrastructure

Strategic Policy 06: Social and Community Infrastructure – no reasonable alternatives identified.

Policy SI1: Safeguarding and Securing Social Infrastructure – no reasonable alternatives identified.

Policy SI2: Play and Informal Leisure – no reasonable alternatives identified.

Policy SI3: Sport and Recreation – no reasonable alternatives identified.

Policy SI4: Digital and Communications Infrastructure – no reasonable alternatives identified.

Chapter 07: Green Infrastructure

Strategic Policy 07: Green Infrastructure – no reasonable alternatives identified.

Policy GI1: Green Belt and Metropolitan Open Land – no reasonable alternatives identified.

Policy GI2: Open Space – one reasonable alternative identified

Alternative 1: More restrictive policy

One reasonable alternative to this policy is proposed. This policy specifies that Open Space could be used for the development of community infrastructure in exceptional circumstances. A reasonable alternative would be to make this policy more restrictive, removing this specification and not allowing development of community infrastructure on Open Space land. This alternative would however potentially impact upon the provision of community infrastructure required to support development and the ability for the LPA to consider the overall planning balance for individual community infrastructure proposals impacting upon open space.

Policy GI3: Biodiversity – one reasonable alternative identified

Alternative 1: Including the requirement for 15% biodiversity net gain

There is one reasonable alternative to this policy which is to require a Biodiversity Net Gain of 15%. This alternative was previously the preferred option for this policy but has been rejected by the Inspector as there were concerns in relation to whether the higher target was justified by evidence.

Policy GI4: Urban Greening, Landscaping and Trees – no reasonable alternatives identified.

Policy GI5: Food Growing – no reasonable alternatives identified.

Chapter 08: Climate and Nature

Strategic Policy 08: Responding to the Climate and Nature Emergency – no reasonable

Policy CN1: Sustainable Design and Retrofitting – one reasonable alternative identified

Alternative 1: Development size threshold

The policy outlined above applies to all new buildings, with reasonable exclusions for outbuildings. An alternative policy would have an option that just focusses on major applications / development proposals, (i.e 10+ units) or the small site threshold (sites less than 0.25 ha in size). This option has not been pursued as it would likely undermine the strategic intent of the policy for all buildings to meet net zero standards, particularly for smaller housing developments of 9 units or less. If this option were pursued, smaller developments would need to demonstrate that they have aimed to make buildings as close to net zero as possible, within the limits of viability. As Harrow is likely to experience significant incremental development outside of the opportunity area (reflected by the indicative small sites target in the London Plan being a significant proportion of the overarching housing target for Harrow), many buildings in the suburban areas would not be required to be net zero, which would be a missed opportunity to minimise carbon emissions and future proof the borough's buildings.

Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations

Outlined below is an alternative option for the Sustainable Design Policy, based on a continuation of the approach of using Part L of the Building Regulations to define and measure carbon / net zero.

Policy Option 1 – Part L, Building Regulations (not the preferred option):

All developments must achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions.

On-site carbon reduction

All developments must reduce carbon emissions on-site as much as possible. In terms of regulated emissions, the minimum level of on-site performance required is:

- Domestic buildings: 65% better than Part L 2021
- Office buildings: 25% better than Part L 2021
- School buildings: 35% better than Part L 2021
- Industrial buildings: 45% better than Part L 2021
- Hotel: 10% better than Part L 2021
- Other non-domestic buildings: 35% better than Part L 2021 (tbc)

Buildings must also comply with the other requirements of the Building Regulation

Part L 2021, e.g. Fabric Energy Efficiency criterion for domestic buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.

Applicants must undertake Part L 2021 modelling to demonstrate compliance.

Unregulated emissions must also be reduced as much as possible.

Carbon offsetting

On-site carbon reductions should be maximised as far as possible before any remaining emissions are offset. If the Council is satisfied that the development has maximised on-site reductions, but the development is still short of achieving Net Zero Carbon, the developer is expected to make a cash-in-lieu contribution to the Council's carbon offsetting fund at a price of **£880/tCO₂** per year over a period of 30 years in order to offset any remaining carbon emissions and achieve net zero carbon.

Policy CN2: Energy Infrastructure – no reasonable alternatives identified.

Policy CN3: Reducing Flood Risk – no reasonable alternatives identified.

Policy CN4: Sustainable Drainage – no reasonable alternatives identified.

Policy CN5: Waterway Management – no reasonable alternatives identified.

Chapter 09: Managing Waste and Supporting the Circular Economy

Strategic Policy 09: Managing Waste and Supporting the Circular Economy – no reasonable alternatives identified.

Policy CE1: Reducing and Managing Waste – no reasonable alternatives identified.

Chapter 10: Transport and Movement

Strategic Policy 10: Movement – no reasonable alternatives identified.

Policy M1: Sustainable Transport – no reasonable alternatives identified.

Policy M2: Parking – no reasonable alternatives identified.

Policy M3: Deliveries, Servicing and Construction – reasonable alternatives identified



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