



# London Borough of Harrow Council Local Plan

## Integrated Impact Assessment – Main Modifications Addendum

### London Borough of Harrow Council

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

Prepared by:

**SLR Consulting Limited**

Broadwalk House, Southernhay West, Exeter, EX1  
1GE

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## 1.0 Introduction

This addendum has been produced by SLR Consulting Ltd in relation to the Integrated Impact Assessment (IIA) prepared for the Harrow Local Plan proposed Main Modifications Consultation document (Examination reference LBH/ED30<sup>1</sup>). The Local Plan Main Modifications document, along with the supporting Local Plan IIA documents were subject to a consultation between 10 November 2025 and 23 December 2025.

This addendum sets out housing number updates to the IIA Report (LBH/ED31<sup>2</sup>) and its appendices (LBH/ED31, C, D<sup>3</sup>) and has been prepared for comment before the Inspector finalises her report. The housing number updates were included in the Main Modifications (LBH/ED30), however, the updates were not included in the version of the IIA (including the assessment of the Main Modifications) that was consulted on alongside the Harrow Local Plan proposed Main Modifications Consultation document (LBH/ED30).

The relevant policies (including the updated housing numbers) have been re-assessed against the IIA Framework. The outcomes of this are set out within this addendum report.

## 2.0 Summary of updates to the IIA documents

The IIA Report (LBH/ED31<sup>4</sup>) contained superseded references to the amount of housing proposed to be delivered within the Harrow & Wealdstone Opportunity Area. In the Main Modifications to the Local Plan (LBH/ED30), the housing growth proposed within the Opportunity Area is reduced from 8,750 to 8,300 units, to reflect post hearing housing numbers position. A further amendment relates to the small sites windfall allowance, which increases from 4,125 to 5,250; this reflects the outcomes of discussions during hearing sessions on how the London Plan's target of 375 dwellings per year from small sites is reflected in the five- and twenty-year housing supply position. These were included within the Local Plan Main Modifications document under reference MM19 for Strategic Policy SP3: Meeting Housing Needs. The amended Opportunity Area housing figure of 8,300 was also included within the Spatial Strategy modification (reference MM2), and within the modification to Policy SP05 Harrow & Wealdstone Opportunity Area (reference MM32).

These two errors appear multiple times within the IIA Report, in the following locations:

In the ***Integrated Impact Assessment Report – Main Modifications (7 November 2025)***:

- ***Section 3.3 Plan Vision and Objectives, Table 3-1: Harrow Local Plan Strategic Objectives and Spatial Strategy p.41***, the spatial strategy refers to delivery of circa 8,750 homes within the Harrow & Wealdstone Opportunity Area. The correct figure is 8,300 homes.
- ***Section 6.2.1 Spatial Strategy Alternatives p.63***, the preferred spatial strategy refers to delivery of circa 8,750 homes within the Harrow & Wealdstone Opportunity Area. The correct figure is 8,300 homes.

<sup>1</sup>LBH/ED30: <https://www.harrow.gov.uk/downloads/file/33422/lbh-ed30-main-modifications-schedule>

<sup>2</sup> LBH/ED31: <https://www.harrow.gov.uk/downloads/file/33425/lbh-ed31-harrow-mm-ii-a-report-final>  
and appendices LBH/ED31, C, D: <https://www.harrow.gov.uk/planning-developments/local-plan-examination/3#ED31>

<sup>3</sup> LBH/ED31, C, D: <https://www.harrow.gov.uk/planning-developments/local-plan-examination/3#ED31>

<sup>4</sup> LBH/ED31: <https://www.harrow.gov.uk/downloads/file/33425/lbh-ed31-harrow-mm-ii-a-report-final>  
and appendices LBH/ED31, C, D: <https://www.harrow.gov.uk/planning-developments/local-plan-examination/3#ED31>



- **Section 12 Potential Cumulative Effects, Table 12-1: Potential Cumulative Effects Identified in the Assessment of Local Plan Policies (Intra Plan) p135**, in relation to the Spatial Strategy policy, Strategic Policy 01, Strategic Policy 03 and Strategic Policy 05, the description of potential cumulative effects indicates a minimum of 7,500 homes will be developed within the opportunity area over the plan period. The correct figure is 8,300 homes.

In the **Integrated Impact Assessment Report – Main Modifications, Appendix C Summary of Policy Alternatives Assessment (7 November 2025)**:

- **Section 2 Defining the Spatial Strategy Reasonable Alternatives, Table C2-1: Spatial Strategy Reasonable Alternatives p.3**, the preferred strategy is described as “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”. The correct figures are 8,300 homes for the Opportunity Area and 5,250 homes for small sites.
- **Section 10 Alternatives Assessed p.27**, the description of Policy GR10: Development on Infill and backland sites, garage sites, garden land and non-designated open spaces Alternative 2 - More permissive policy states “within the Harrow & Wealdstone Opportunity Area (a minimum of 7,500 dwellings)”. The correct figure is 8,300 dwellings.

In the **Integrated Impact Assessment Report – Main Modifications, Appendix D Assessment of Local Plan Policies (7 November 2025)**, the assessment tabs for the Spatial Strategy (IIA Objective 5), Policy SP03 Meeting Harrow's Housing Needs (IIA Objective 1) and Policy SP05 Harrow & Wealdstone Opportunity Area (IIA Objective 5) refer to the development of 8,750 new homes within the Opportunity Area. The correct figure is 8,300 new homes.

In order to ensure that up to date information on the performance of the Main Modifications is presented for comment, the assessments (Appendix D) of the Spatial Strategy, Policy SP03 Meeting Harrow's Housing Needs and Policy SP05 Harrow & Wealdstone Opportunity Area, as well as the potential cumulative effects assessment (Section 12 of the Main Report), have been reassessed.

The references to the housing delivery figures in **Section 3.3 Plan Vision and Objectives** and **Section 6.2.1 Spatial Strategy Alternatives** of the main IIA Report and in **Appendix C Summary of Policy Alternatives Assessment** of the IIA Report are descriptions of the preferred spatial strategy and do not require any reassessment.

## 3.0 Reassessment outcome

A further assessment of the three relevant policies has been undertaken, taking into account the revised figures. The updated policies assessments are presented in **Addendum Appendix B Updated Policies Assessment** to this addendum (as a separate Excel file). The previous assessments of these policies appear in Appendix D of the IIA Report (7 November 2025) (LBH/ED31D).

Table 3-1 below outlines the key findings of the updated policies assessment included within **Addendum Appendix B Updated Policies Assessment** This sets out the impact of the



updated housing figures on the performance of the policies against the IIA Framework objectives.

**Table 3-1: Key Findings of the Updated Policies Assessment**

Preferred Policy	IIA objective	Current IIA score	Summary of the update to the assessment (Column K)	Outcome of the revised assessment (Column J)
<b>Spatial Strategy</b>	IIA 5: Housing	Significant positive	The housing delivery figure for the Harrow & Wealdstone Opportunity Area was reduced from 8,750 to 8,300 homes.	The assessment of the spatial strategy against IIA Objective 5 results in a significant positive score.  There is no material change in the assessment.
<b>Strategic Policy SP03: Meeting Harrows housing needs</b>	IIA 1: Economy	Minor positive	The housing delivery figure for the Harrow & Wealdstone Opportunity Area was reduced from 8,750 to 8,300 homes.	The assessment of the Policy SP03 against IIA Objective 1 results in a minor positive score.  There is no material change in the assessment.
<b>Strategic Policy SP03: Meeting Harrows housing needs</b>	IIA 5: Housing	Significant positive	No amends necessary.	Whilst the housing delivery figures are not reproduced in the assessment text, the assessment has been reviewed to take account of the revised figures for housing delivery across the borough, including small sites and the figure for housing delivery in the Opportunity Area.  The assessment of the Policy SP03 against IIA Objective 5 results in a significant positive score. There is no material change in the assessment.
<b>Policy SP05 Harrow &amp; Wealdstone Opportunity Area</b>	IIA 5: Housing	Minor positive	The housing delivery figure for the Harrow & Wealdstone Opportunity Area was reduced from 8,750 to 8,300 homes.	The assessment of the Policy SP05 against IIA Objective 5 results in a minor positive score.  There is no material change in the assessment.



With regards to Potential Cumulative Effects of the Spatial Strategy policy, Strategic Policy 01, Strategic Policy 03 and Strategic Policy 05 against IIA Objective 3 (Accessibility) and IIA Objective 4 (Health and Wellbeing), the table contained within **Addendum Appendix A Updated Cumulative Effects Assessment** presents the updated assessment previously presented in Table 12-1 of the IIA Report (7 November 2025) (LBH/ED31).

Table 3-2 below outlines the key findings of the updated cumulative effects assessment included within **Addendum Appendix A Updated Cumulative Effects Assessment**. This sets out the impact of the updated housing figures on the potential cumulative effects of the Spatial Strategy Policy, Strategic Policy 01, Strategic Policy 03, Strategic Policy 05 against IIA Objective 3 and IIA Objective 4.

**Table 3-2: Key Findings of the Updated Cumulative Effects Assessment**

Preferred Policy	IIA objective	Current IIA score	Summary of the update to the assessment	Outcome of the revised assessment
<b>Spatial Strategy Policy, Strategic Policy 01, Strategic Policy 03, Strategic Policy 05</b>	IIA3 (Accessibility), IIA4 (Health and Wellbeing)	Uncertain cumulative effect	The housing delivery figure for the Harrow & Wealdstone Opportunity Area was amended from a minimum 7,500 to 8,300 homes.	The assessment of the preferred policies against IIA objective 4 and 3 results in an Uncertain cumulative effect.  There is no material change in the assessment.

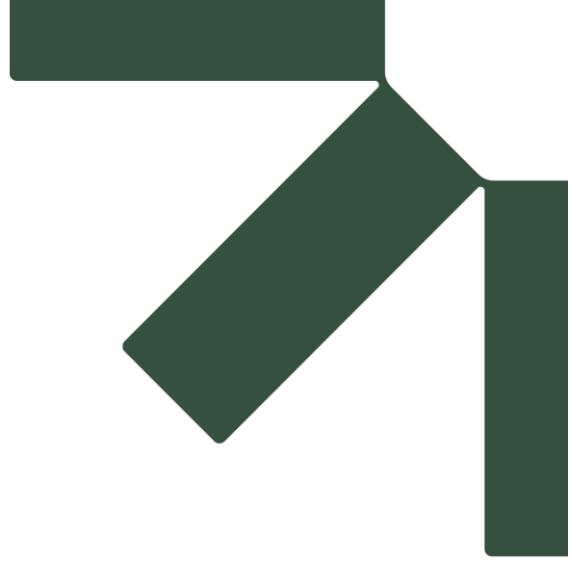
## 4.0 Conclusions

The updates to the IIA in relation to the housing numbers amendment (including re-assessments at Appendices A and B of this addendum) conclude that there are no changes to the sustainability performance of the policies against the IIA Framework or conclusions of the IIA.

In addition, the amendment of the housing delivery figure referenced in the following locations within the IIA Report does not make a difference to the findings or conclusions of the IIA:

- **Main IIA Report Section 3.3 Plan Vision and Objectives, Table 3-1: Harrow Local Plan Strategic Objectives and Spatial Strategy p.41;**
- **Main IIA Report Section 6.2.1 Spatial Strategy Alternatives p.63;**
- **Appendix C Section 2 Defining the Spatial Strategy Reasonable Alternatives, Table C2-1: Spatial Strategy Reasonable Alternatives p.3; and**
- **Appendix C Section 10 Alternatives Assessed p.27.**





# **Appendix A   Updated Cumulative Effects Assessment**

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## A.1 Introduction

This appendix provides an update of the relevant part of Table 12-1 Potential Cumulative Effects Identified in the Assessment of Local Plan Policies (Intra Plan) which appears in Section 12 Potential Cumulative Effects (p135) of the main IIA Report.

**Table A-1: Potential Cumulative Effects Identified in the Assessment of Local Plan Policies (Intra Plan)**

Policy/Chapters	IIA Objective	Potential Cumulative Effect	Description of Potential Cumulative Effects
Spatial Strategy Policy, Strategic Policy 01, Strategic Policy 03, Strategic Policy 05	IIA3 (Accessibility), IIA4 (Health and Wellbeing)	Uncertain cumulative effect	The emphasis of new development requiring access to good public transport (through PTAL scores of 3 or higher) could lead to a focussing of development in limited areas of the Borough, around established town and district centres (which is where PTAL scores of 3 or higher currently exist). This could indirectly increase demand in such locations for local schools, healthcare services and leisure facilities, particularly within the Harrow Weald Opportunity Area – in which a minimum of 8,300 homes will be developed over the plan period. Policies within Chapters 06, 07 and 08 of the Local Plan seek to deliver community infrastructure in tandem with new development in these areas.





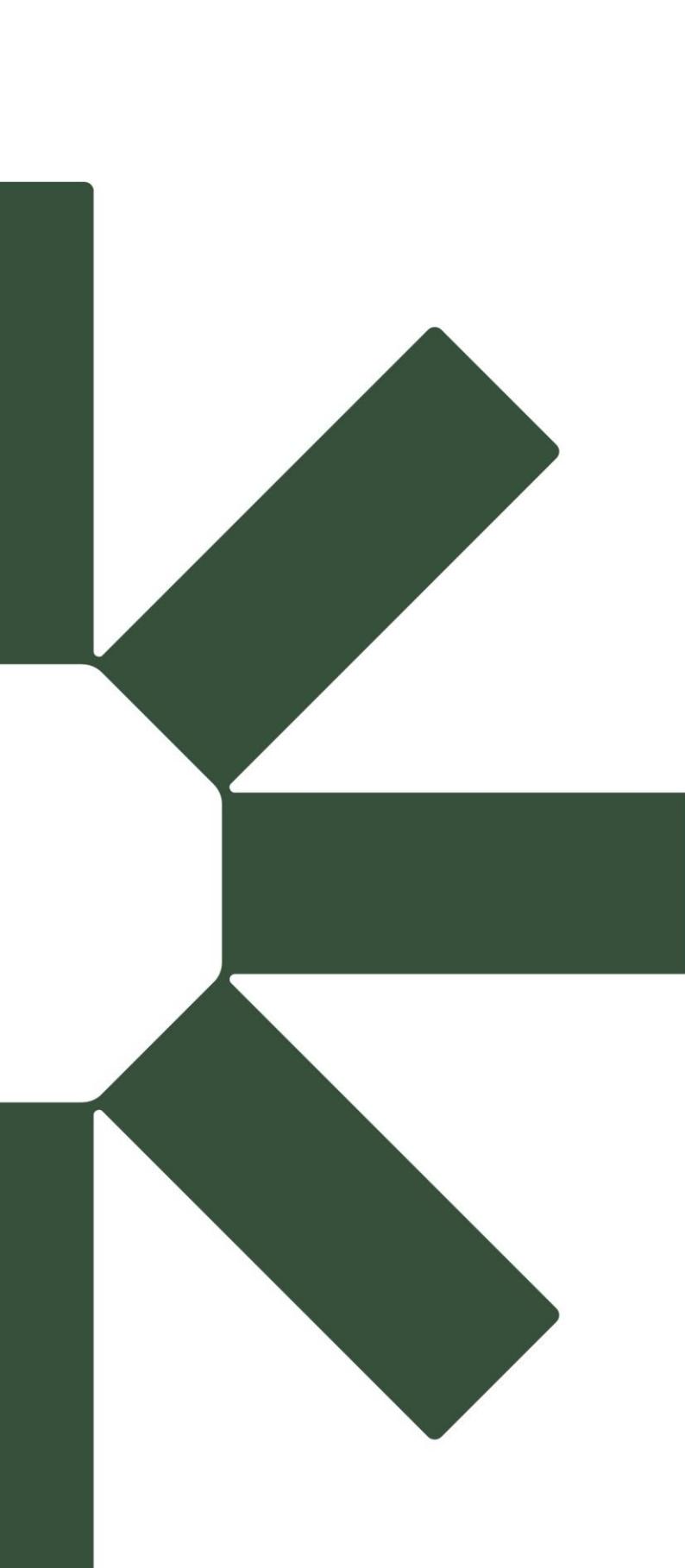
## **Appendix B   Updated Policies Assessment (separate Excel document)**

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