



London Borough of Harrow Council Local Plan

Integrated Impact Assessment Adoption Statement

London Borough of Harrow Council

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Basis of Report

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Table of Contents

Basis of Report	ii
1.0 Introduction	5
1.1 Background	5
1.2 This IIA Adoption Statement	5
2.0 Integration of Sustainability and Environmental Considerations	6
2.1 Introduction	6
2.2 IIA Stage A Scoping	7
2.3 IIA Stage B Options Assessment and Information Provision	8
2.4 Stage C and D Draft Plan Assessment	8
3.0 How the IIA Report and Consultation Informed the Local Plan	10
4.0 The Reasons for Choosing the Local Plan as Adopted	12
4.1 Choice of Spatial Strategy	12
4.2 Choice of Local Plan Policies	12
4.2.1 High Quality Growth Policies Alternatives	12
4.2.2 Housing Policies Alternatives	13
4.2.3 Local Economy Policies Alternatives	19
4.2.4 Green Infrastructure Policies Alternatives	20
4.2.5 Climate and Nature Policies Alternatives	20
4.3 Choice of Local Plan Allocations	21
5.0 Monitoring Significant Effects	22

Tables in Text

Table 2-1 Harrow Local Plan and IIA Timeline	6
Table 4-2: High quality Growth Policy Alternatives	12
Table 4-3: Strategic Policy 03 Alternatives	13
Table 4-4: Policy HO1 Alternatives	13
Table 4-5: Policy HO2 Alternatives	14
Table 4-6: Policy HO4 Alternatives	15
Table 4-7: Policy HO5 Alternatives	15
Table 4-8: Policy HO6 Alternatives	16
Table 4-9: Policy HO7 Alternatives	16
Table 4-10: Policy HO8 Alternatives	17
Table 4-11: Policy HO9 Alternatives	17
Table 4-12: Policy HO10 Alternatives	18



Table 4-13: Policy HO12 Alternatives.....	18
Table 4-14: Policy LE1 Alternatives.....	19
Table 4-15: Policy LE3 Alternatives.....	19
Table 4-16: Policy GI2 Alternatives	20
Table 4-17: Policy GI3 Alternatives	20
Table 4-18: Policy CN1 Alternatives.....	20
Table 5-1: Proposed Monitoring Indicators.....	22

Appendices

Appendix A IIA Framework



1.0 Introduction

1.1 Background

The Harrow Local Plan has been subject to Integrated Impact Assessment (IIA) incorporating a Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA). A parallel Habitats Regulations Assessment was also undertaken and the findings incorporated into the IIA.

This adoption statement has been prepared at the time of adoption of the Local Plan and will be made available alongside the adopted Local Plan, on the London Borough of Harrow Council's (LBHC) website. The Local Plan has been adopted by the Council on 24 March 2026.

The Harrow Local Plan sets out the future development and growth of the local authority area between 2021 and 2041. In particular, the Local Plan makes provision for future housing and employment growth.

IIA is a mechanism for considering and communicating the likely significant sustainability effects of an emerging plan, and the reasonable alternatives considered during the plan-making process. The aim of an IIA is to inform and influence the plan-making process with a view to avoiding or mitigating potential negative effects and maximising positive effects. Through this approach, the IIA seeks to maximise the contribution of the Harrow Local Plan to sustainable development.

1.2 This IIA Adoption Statement

This Adoption Statement is a requirement of the SEA Regulations (Part 4, Regulation 16, (4))¹ which requires that as soon as reasonably practicable, the following information is provided²:

- How sustainability considerations have been integrated into the Local Plan (see **Section 2**);
- How the IIA Report and consultation comments have informed the Local Plan (see **Section 3**);
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with (see **Section 4**); and
- The measures that are to be taken to monitor the significant sustainability effects of the implementation of the plan or programme (see **Section 5**).

¹ The Environmental Assessment of Plans and Programmes Regulations 2004. [Microsoft Word - 040630SEA final draft.doc](#) (Accessed 20/02/2026)

² As a IIA has been undertaken which incorporates SEA, the information required relates to broader sustainability information and not just environmental information



2.0 Integration of Sustainability and Environmental Considerations

2.1 Introduction

During the plan-making process, IIA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The IIA was undertaken in accordance with government guidance as a staged approach that considers the effects of the emerging plan on socio-economic as well as environmental factors.

The timeline for the development of the Local Plan and the parallel IIA is presented in **Table 2-1** below. As demonstrated in **Table 2-1**, the IIA has been undertaken iteratively, at all stages of plan preparation, taking into account comments received from consultees.

The IIA assessed all sites and policies during each iteration of the Local Plan and their reasonable alternatives, including the proposed Main Modifications made to the Local Plan following its submission. The IIA process informed decision making with regards to which options were selected and brought forward.

Table 2-1 Harrow Local Plan and IIA Timeline

Year	Local Plan Activity	IIA Activity
Evidence gathering and IIA Scoping		
2023	Local Plan Evidence Gathering	IIA Stage A Evidence gathering informed the development of the IIA Scoping Report ³ in 2023.
Options Development, Assessment and Information Provision		
2024	Development of spatial strategy options. Regulation 18 consultation on Alternative Spatial Strategy Options and Alternative Policies. Consultation responses informed the Council's decision on a preferred spatial strategy option and policies.	IIA Stage B Reasonable alternatives for the spatial strategy and policies were assessed, and the findings were presented in the LBHC Local Plan IIA Report 2024 ⁴ , alongside the Local Plan consultation document between February and April 2024.
Draft Plan Development and Assessment		
2024	Decision making on spatial strategy and preferred plan. Preparation of the draft Local Plan Regulation 19 Pre-Submission Version ⁵ .	IIA Stage C Between April and October 2024, an IIA Report of the Pre-Submission Local Plan was produced and shared with LBHC prior to consultation. This included the

³ SLR (2023) Local Plan Integrated Impact Assessment – Scoping Report. Available at: https://www.harrow.gov.uk/downloads/file/32730/LPPD06_Lcal_Pln_Pre_Reg_18_IIA_Scoping_Rep.pdf

⁴ SLR (2024) Local Plan Integrated Impact Assessment – Integrated Impact Assessment Report. Available at: https://www.harrow.gov.uk/downloads/file/32721/LPPD03_Local_Plan_Reg_18_IIA_Report.pdf

⁵ London Borough of Harrow Council (2024) Harrow's New Local Plan 2021-2041. Available at: https://www.harrow.gov.uk/downloads/file/32695/CSD01_Harrow_Local_Plan_Regulation_19_version_November_2024_.pdf



Year	Local Plan Activity	IIA Activity
		assessment of site allocations, preferred policies, and preferred spatial options.
2024	Regulation 19 Pre-Submission consultation between November – December 2024. Regulation 22 Submission in February 2025. The Pre-Submission version of the Local Plan was submitted to the Secretary of State, with a set of proposed modifications.	IIA Stage D The LBHC Pre-Submission Local Plan Regulation 19 IIA Report ⁶ was published for consultation from November – December 2024 alongside the Pre-Submission Local Plan.
2025	Local Plan Examination Public Hearing Sessions in June, July and October 2025, following which a programme of additional works was undertaken and Main Modifications identified. Consultation on the Proposed Main Modifications to the Local Plan was undertaken between November-December 2025.	The LBHC Main Modifications Local Plan IIA Report ⁷ was subject to public consultation between November-December 2025. An IIA Main Modifications Addendum ⁸ was produced in January 2026, setting out updated housing number assessments. This was consulted on between January – February 2026.
Local Plan Adoption		
2026	The Planning Inspector has published their report and confirmed the Main Modifications to the Local Plan. The Main Modifications have been made to the Local Plan and the Local Plan adopted.	This IIA Adoption Statement has been prepared to coincide with the adoption of the Local Plan on 24 March 2026.

2.2 IIA Stage A Scoping

The purpose of the Scoping stage is to identify existing and future environmental, social, economic, health, equality issues facing Harrow, based on analysis of baseline data and other relevant Policies, Plans and Programmes (PPP).

This initial stage of the IIA process included developing the IIA Scoping Report. The report presented baseline data, and plans, policies and programmes that may influence the Local Plan, as well as potential sustainability issues within the Borough. This report informed both

⁶ SLR (2025) Local Plan Integrated Impact Assessment – Regulation 19 Integrated Impact Assessment Report. Available at:

https://www.harrow.gov.uk/downloads/file/33200/LBHED15A_and_CSD03ac_Reg_19_IIA_Report_3.pdf

⁷ SLR (2025) Integrated Impact Assessment Report – Main Modifications. Available at:

<https://www.harrow.gov.uk/downloads/file/33425/lbh-ed31-harrow-mm-ia-report-final>

⁸ SLR (2026) Integrated Impact Assessment – Main Modifications Addendum. Available at:

<https://www.harrow.gov.uk/downloads/file/33561/lbh-ed31aa-ia-main-mods-addendum-report-3>



the development of the Local Plan and the development of the IIA Framework (see **Table A 1 in Appendix A**).

The IIA Scoping Report was consulted on for a period of five weeks (October – November 2023) with statutory consultees and key stakeholders. Following consultation, the Scoping Report was updated in line with consultee comments. Further details on consultation can be found in **Section 3**.

The performance of the Local Plan allocation sites, spatial strategy and policies along with their reasonable alternatives have been assessed against the IIA objectives in the IIA Framework. By using the Framework to test the Local Plan throughout the development process, sustainability and environmental considerations have been understood and integrated throughout the IIA.

2.3 IIA Stage B Options Assessment and Information Provision

Stage B of the IIA involved assessing reasonable alternative options, and reporting the assessment outputs. Options assessments were undertaken to inform Local Plan decision making in relation to the spatial strategy and the development of policy wording. Further information on the reasonable alternatives considered can be found in **Section 4** of this report.

An initial set of Local Plan proposed policies were subject to assessment:

- Spatial Strategy Policy;
- High Quality Growth Policies;
- Heritage Policies;
- Housing Policies;
- Local Economy Policies;
- Community Infrastructure Policies;
- Green Infrastructure Policies;
- Climate and Nature Policies;
- Waste and Circular Economy Policies; and
- Movement Policies.

The findings of the assessments at this stage were presented in an IIA Report in February 2024. The Interim IIA Report was consulted on alongside the Regulation 18 Local Plan between February 2024 and April 2024.

2.4 Stage C and D Draft Plan Assessment

The Draft Local Plan policies and site allocations were assessed in 2024 and proposed mitigation measures put forward to address potential significant negative and uncertain effects. Enhancement measures were also recommended in cases where there was the opportunity to improve a neutral or positive performance of the plan.

Mitigation measures were described within the IIA assessments and reported to Council officers at both the Regulation 18 and Regulation 19 stages within IIA reports. These mitigation measures were then responded to by Council officers. Some mitigation measures have since been incorporated in later iterations of the Local Plan through the amendment of policies and policy supporting text. Further details on this can be found in **Section 3** of this adoption statement.



As set out in **Table 2-1**, the IIA Report was consulted on at the Regulation 19 stage. An updated IIA – Main Modifications Report was prepared in November 2025 and sets out the IIA findings of the Inspector’s proposed main modifications version of the Local Plan policies and sites as well as the reasonable alternatives considered. The updated IIA Main Modifications Report was consulted on alongside the Harrow Local Plan proposed Main Modifications Consultation document. Further details on consultation can be found in **Section 3**.

An IIA Main Modifications Addendum was produced by SLR in January 2026. The addendum sets out housing number updates to the IIA Report and was prepared for consultation before the final Inspector’s report was issued. The relevant policies (including the updated housing numbers) were re-assessed against the IIA Framework as part of this Addendum. It was consulted on between 28 January and 11 February 2026.



3.0 How the IIA Report and Consultation Informed the Local Plan

This section describes how consultation and IIA reporting have informed the development of the Local Plan.

The first output of the IIA was the Scoping Report which was consulted on for a five-week period between October – November 2023. Statutory consultees and a range of other key stakeholders were consulted on the Scoping Report.

Comments were received from the following consultees:

- Environment Agency;
- Historic England;
- Natural England;
- Harrow Nature Conservation Forum and Harrow Wildlife Action;
- NHS North East London/NHS London Health Urban Development unit; and
- London Borough of Harrow Council Departments for Culture and Leisure, Transport, Education, Planning, Equalities and the Commercial Safety Team.

The consultee comments suggested changes to the IIA Framework, changes to the baseline data, additional data and additional documents of relevance to the IIA. These actions were included within the final Scoping Report, which was finalised in February 2024.

The Interim IIA Report and draft policy assessment were consulted on between February 2024 and April 2024 with the public and statutory consultees, as well as key stakeholders.

Local residents and key stakeholders were contacted directly as part of this consultation, and advertisements in newspapers and advertising toblorones publicised. A dedicated webpage was made available on the Council website, which was supported by the My Harrow Talk platform.

In total, 1,094 direct comments on the Local Plan were made by a range of respondents including statutory bodies, local groups and individual members of the public.

Responses to the IIA were received from all statutory consultees; Environment Agency, Historic England, and Natural England.

These responses were reviewed and considered within both the draft Local Plan and next iteration of the IIA report.

The IIA Report at this stage also outlined suggested mitigation measures for proposed policies and sites within the Local Plan. These measures were considered by LBHC for inclusion within the next iteration of the Local Plan.

The LBHC Pre-Submission Local Plan (Regulation 19) IIA Report including appendices was published for consultation from November – December 2024 alongside the Pre-Submission (Regulation 19) Local Plan.

Following consultation, respondents' comments and the IIA Report were reviewed and a proposed set of modifications were prepared by the Council prior to submission of the Local Plan.

Following the Examination hearings, the Council prepared a schedule of proposed Main Modifications, some of which responded to mitigation measures suggested in the Regulation 19 IIA Report.



The changes made to the Local Plan in response to suggested mitigation measures include:

- Development requirements of allocation OA3: College Road include re-provision of a place of worship;
- Development requirements of allocation O14: Vernon Lodge were amended to clarify that a travel plan is required to demonstrate sustainable modes of transport to/from the site;
- Development requirements of allocation GB1: Royal National Orthopaedic Hospital regarding sustainable transport accessibility and active travel routes;
- Amendment to clarify that ten homes will be delivered on allocation O15: Belmont Clinic;
- Details of the level of non-employment floor space that will be provided within a number of site allocations was added; and
- Policy SP08 Responding to the Climate and Nature Emergency was amended to refer to groundwater quality and Policy CN4: Sustainable Drainage and the supporting text were amended to ensure the construction of new sites does not result in water pollution, including surface water run-off, in line with existing best practices and guidelines.

The Proposed Main Modifications to the Local Plan and IIA-Main Modifications Report (November 2025) were subject to public consultation between November - December 2025. No further changes were made to the IIA as a result of the consultation comments received at this stage.

An IIA Main Modifications Addendum was produced in January 2026. The addendum sets out housing number updates to the IIA Report. The relevant policies (including the updated housing numbers) were re-assessed against the IIA Framework as part of this Addendum. This was consulted on from January – February 2026. The three statutory consultees (Natural England, Historic England, Environment Agency) responded confirming they had no comments on the IIA Addendum.



4.0 The Reasons for Choosing the Local Plan as Adopted

4.1 Choice of Spatial Strategy

The preferred spatial strategy, which is the evolution of the existing spatial strategy included within the Core Strategy updated to ensure compliance with the London Plan 2021 (e.g. Policies SD1,6,7; HS1,2; GG2, etc), has been selected by LBHC as the preferred policy option. The key reasons are:

- (1) In line with the London Plan (2021) and National Policy, this strategy will enable the Local Plan to identify/allocate a sufficient supply of deliverable previously developed sites within the existing built-up area, to address the Borough’s housing needs, particularly for affordable and family sized housing;
- (2) It will encourage new housing development within the most accessible, sustainable locations of the Borough, such as; the Opportunity Area that is suitable location for high density development; within/edge of Town Centres and transport hubs, where infrastructure capacity exists/or can be increased to accommodate additional demands. This will ensure residents have good accessibility, to local facilities, services, employment opportunities via sustainable modes of transport, to reduce carbon emissions and address the causes/effects of climate change.
- (3) In compliance with the London Plan (2021), this will help maintain and protect the existing supply of employment land, promote the urban regeneration, as well as protect and enhance the Green Belt, MOL, open spaces and the Borough character.
- (4) The IIA assessment indicates that the preferred option generally performs well. It performs similarly to Alternative 1 but better meets the objectives relating to IIA7 (Air, Noise and Light Pollution) and IIA8 (Climate Change Adaptation).

The two identified reasonable alternatives to the preferred spatial strategy were ‘Spatial Strategy Alternative 1’ (retain existing spatial strategy of the Core Strategy (adopted 2012)) and ‘Spatial Strategy Alternative 2’ (a strategy to enable the accommodation of a higher level of growth).

4.2 Choice of Local Plan Policies

4.2.1 High Quality Growth Policies Alternatives

Table 4-1: High quality Growth Policy Alternatives

Policy GR10: Development On Infill and Backland Sites, Garage Sites, Garden Land and Non-Designated Open Spaces: Preferred	Outlines how development proposals on infill and backland sites, garage sites, garden land and non-designated open space will be considered. Proposals will be assessed against a set of criteria, including how the area incorporates appropriate design, as well as supports the delivery of home.
Policy GR10: Alternative 1	No policy option
Policy GR10: Alternative 2	More permissive policy

The Council selected the preferred alternative, as this provides a stronger policy basis to determine applications on different types of sites covered by it, whilst balancing this with the need to enable well designed new housing to be delivered in the most suitable sites, to



address local needs. This is supported by the IIA which indicates that the preferred policy performs more positively than the alternatives.

4.2.2 Housing Policies Alternatives

Table 4-2: Strategic Policy 03 Alternatives

Strategic Policy 03 Meeting Harrow's Housing Needs: Preferred	Meeting Harrow's housing needs: this is rolling forward London Plan housing delivery target of 802 homes per annum for another ten years, so that it totals 16,040 over the plan period (2021-41).
Strategic Policy 03: Alternative 1	High housing growth: include a housing requirement for a total of 24,266 homes (1,213 homes per annum) over the plan period (2021-41) based on demographic led projections considered by the Local Housing Needs Assessment.
Strategic Policy 03: Alternative 2	Low housing growth (12,829): stepped trajectory over a fifteen-year plan period.

The Council selected the preferred alternative which is to include a housing requirement/target of 16,040, which rolls forward the London Plan target of 8,020 homes for another ten years, to cover the Local Plan period (2021-41). The key reasons are; it will ensure a sufficient supply of new housing (including family sized and affordable housing) is delivered to address the Borough's future housing needs, based on housing capacity evidence, in compliance with the London Plan (2021). Further, the preferred alternative will ensure previously developed sites within the most sustainable, accessible locations of the Borough's existing settlement boundary are prioritised to address future housing needs; as well as protect, enhance the Green Belt, Metropolitan Open Land, scarce employment designations and the historic environment; in line with London Plan and National Policy.

Table 4-3: Policy HO1 Alternatives

Policy HO1: Dwelling Size Mix: Preferred	Outlines the approach for ensuring new residential developments deliver a good mix of unit sizes to address needs. It seeks to prioritise the delivery of a higher proportion of family sized housing and ensure 35% (or more) of total units delivered within a scheme are family sized (i.e. 3b/+) and the smallest two bed units are of a sufficient size to accommodate four bed spaces which meets the identified need for family housing.
Policy HO1: Alternative 1	Continue with existing policy DM 24 Housing mix.
Policy HO1: 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).
Policy HO1: Alternative 3	Include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing.
Policy HO1: Alternative 4	Do not apply 25% family housing target to minor development.



Policy HO1 Alternative 5	Include a target of 25% for the proportion of housing on a scheme that should be for family housing.
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The preferred alternative changed between Regulation 19 and the Proposed Main Modifications. The selected policy will provide a strong policy approach for ensuring a good unit size mix of residential units are delivered within new development to address future needs (particularly for families) and deliver balanced mixed, inclusive communities. This will increase the scope to increase the delivery of family sized housing, by requiring 35% (or more) units within a scheme to be three bed (or more) units and the smallest two bed units to be capable of accommodating four bed spaces in order to be used by families. It recognises some sites may not be able to meet these requirements, as well as the need to balance these requirements with the need to optimise housing output to address needs, site constraints and viability Furthermore, the approach is supported by Local Plan evidence such as the Local Housing Needs Assessment.

Table 4-4: Policy HO2 Alternatives

Policy HO2: Conversion and Redevelopment of Dwellings: Preferred	Outlines the approach for assessing proposals for the conversion and redevelopment of larger homes into smaller self-contained residential units (C3). It seeks to protect family sized housing by requiring proposals to have an internal floor area of 130m ² . Development should also re-provide at least one family sized home and be located within an accessible area (PTAL 3+).
Policy HO2: 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).
Policy HO2: Alternative 2	Policy should not include a minimum 130m ² size threshold for the conversion/redevelopment of homes into flats.
Policy HO2: Alternative 3	Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m ² capable of providing a three-bed unit with access to a garden.
Policy HO2: Alternative 4	Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6
Policy HO2: Alternative 5	The proposed housing conversions policy should not apply to demolitions of a larger family sized home.
Policy HO2: 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 Council has selected the preferred alternative as the local housing needs assessment identifies a significant need to increase the provision of family sized housing. This seeks to:

- protect smaller sized family housing that are more affordable from being lost to multiple units (i.e. floor area of 130m²+) and avoids the delivery of poorly designed flats;
- ensure no net loss to stock of family sized housing by requiring the re-provision



- support proposals within locations that have good accessibility (PTAL 3-6) to local facilities, services, to promote sustainable modes of transport and reduce the loss of family housing; and
- achieve a balance between increasing the delivery of housing and addressing the housing needs of families.

Table 4-5: Policy HO4 Alternatives

Policy HO4 Genuinely Affordable Housing: Preferred	Outlines the approach for increasing the provision of genuinely affordable housing and the mix of the right tenure to deliver mixed and inclusive communities. It seeks to prioritise the delivery of a higher proportion (70%) of low cost rented housing.
Policy HO4: Alternative 1	To put a greater emphasis on intermediate products.

The Council has selected the preferred alternative as the Local Housing Needs Assessment indicates there is a significant need to increase the delivery of affordable housing, to deliver mixed and inclusive communities. This prioritises the delivery of a higher levels of low cost rented housing; as this is the most genuinely affordable housing product, based on local incomes and costs. This will help address the housing needs of those who are not catered for by the market, as well as reduce the high levels of homelessness, overcrowding and the need to provide temporary accommodation.

Table 4-6: Policy HO5 Alternatives

Policy HO5 Housing Estate Renewal and Regeneration: Preferred	Outlines the approach to assess and support proposals for the renewal/ regeneration of existing housing estates within the Borough, to address the issues facing them and deliver quality housing, including details of design, housing tenure and size and facilities. It includes criteria to assess proposals that may result in the net loss of external amenity space if it complies with the criteria within the policy.
Policy HO5: Alternative 1	No policy.
Policy HO5: 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).

The Council selected the preferred alternative as this provides a strong basis to consider and support proposals for estate regeneration/renewal, address issues facing them; deliver new homes of the right size, tenure and design to address local needs, as well as a higher quality healthier living environment. Further, it includes criteria for assessing proposals that may result in a net loss of open space, in exceptional circumstances). This may enable; a high-quality open space and a well-designed scheme to be delivered and other planning benefits (e.g. address priority housing/community needs); as well as improve viability.



Table 4-7: Policy HO6 Alternatives

Policy HO6 Meeting the housing needs of Older People: Preferred	Outlines the approach for addressing the accommodations needs of older people. It includes criteria to ensure proposals address identified local need and a mix of older person accommodation is provided, including wheelchair accessible accommodation and affordable housing. Accommodation should also be in an accessible location appropriate to the needs of the intended occupier. In line with policy SP3, it seeks to deliver 980 units of older person accommodation.
Policy HO6: Alternative 1	Continue existing Local Plan policy approach (DM 29).
Policy HO6: Alternative 2	Support proposals within/edge of town centres (excluding neighbourhood centres).
Policy HO6: Alternative 3	Include a higher target to provide 165 units per year/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2,300 units over a 15-year period.

The Council has selected the preferred alternative. The key reasons are; it provides a stronger policy to ensure a sufficient quantity of the right type, tenure of older person accommodation is delivered to address local identified needs, as well as protect the existing stock. It ensures schemes are well designed, managed, staffed and located in an accessible location appropriate to the needs of the intended occupier, so that occupants remain independent, healthy and are not socially isolated.

Table 4-8: Policy HO7 Alternatives

Policy HO7 Supported and Specialist Housing: Preferred	Outlines the approach for delivering specialist accommodation to address the accommodation needs of vulnerable/ disadvantaged individuals or groups and protect existing stock. It includes criteria to ensure proposals address identified local housing needs and are well designed and managed/staffed. Accommodation should also be located in accessible locations (PTAL 3+) with access to public transport and local facilities.
Policy HO7: Alternative 1	Continue existing Local Plan policy approach (DM 29).

The Council has selected the preferred alternative. The key reasons are; it provides a stronger policy to ensure the right type of supported/specialist accommodation is delivered to address local identified needs, as well as protect the existing stock. It ensures schemes are well designed, managed, staffed and located within access distance of local facilities/services to enable occupants to remain independent and healthy.



Table 4-9: Policy HO8 Alternatives

Policy HO8 Purpose Built Student Accommodation: Preferred	Outlines the approach for assessing proposals for Purpose Built Student Accommodation (PBSA). It includes criteria to ensure that proposals address identified local housing need and are well designed and managed/designed. Accommodation should also be located in the Opportunity Area, as well as provide affordable housing contributions. There should also not be an over-concentration of PBSAs in one area.
Policy HO8: Alternative 1	No policy.
Policy HO8: Alternative 2	Allow PBSA schemes within accessible locations with PTAL 3-6.

The key reasons for selecting the preferred alternative are; it provides a stronger policy to ensure PBSA proposals; promote good design, they are located within the most accessible locations to local facilities (i.e. the Opportunity Area); do not result in an over concentration of such uses that may harm the character of an area and availability of family housing. In addition, it will ensure PBSA schemes do not have an adverse impact the delivery of priority housing needs like self-contained and affordable housing.

Table 4-10: Policy HO9 Alternatives

Policy HO9 Large Scale Purpose Built Shared Living (LSPBSL): Preferred	Outlines the approach for assessing proposals for large-scale purpose-built shared living (LSPBSL). It includes criteria to ensure that proposals address identified local housing need, are located within the opportunity area, as well as provides affordable housing contributions. There should also not be an over-concentration of LSPBSLs in one area.
Policy HO9: Alternative 1	No Policy.
Policy HO9: Alternative 2	Do not require applicants to demonstrate a need for LSPBSL.
Policy HO9: 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.
Policy HO9: Alternative 4	Do not include distance test for assessing over concentration of LSPBSL.

The key reasons for selecting the preferred alternative are; it will provide a stronger policy approach to ensure LSPBSL schemes address a local identified need and ensure development does not result in an over concentration of such uses, which can undermine the delivery of mixed and inclusive communities. This will ensure LSPBSL developments do not compromise the delivery of conventional self-contained housing to address local needs, particularly affordable and family sized housing. The Opportunity Area is considered the most suitable and accessible location to accommodate LSPBSL schemes



(i.e. 50 units), which tend to be built at a high density of four (or more) storeys on smaller sites, to ensure development viability. This approach will help minimise any potential adverse effects on the character areas of the Borough, particularly in suburban locations.

Table 4-11: Policy HO10 Alternatives

Policy HO10 housing with shared facilities (Houses in Multiple Occupation): Preferred	Outlines the approach for assessing proposals for Houses in Multiple Occupation (HMO). It includes criteria to ensure that proposals address identified local housing need, do not lead to the loss of family housing, are located within accessible locations (PTAL 4+), as well as deliver well designed accommodation/ a satisfactory living environment. There should also not be an over-concentration of HMOs in one area.
Policy HO10: Alternative 1	Continue to apply existing policy (DM30).
Policy HO10: Alternative 2	Allow conversion of family houses to HMOs (i.e. no consideration of the house's internal floor area (130m ²) and the character of the area).
Policy HO10: Alternative 3	Allow HMOS within accessible locations with a PTAL 3-6.
Policy HO10: Alternative 4	Do not include a specific measure to assess the over concentration of HMO's.

The key reasons for selecting the preferred alternative are it provides a stronger policy basis to:

- protect the existing stock of family housing;
- direct HMO developments to locations with good access to local services/facilities (PTAL 4-6);
- ensure well designed HMO accommodation with satisfactory sized rooms and number of facilities; and
- prevent the potential over concentration of HMO's.

Table 4-12: Policy HO12 Alternatives

Policy HO12 Gypsy and Traveller Accommodation Needs: Preferred	Outlines the approach for addressing the need for gypsy and traveller accommodation. The policy aims to retain the existing site at Watling farm and deliver up to 13 additional pitches on this site to address future traveller needs. The policy will also support proposals for new sites and pitches providing that there is an identified need. It includes criteria to ensure that adequate provision of satisfactory access, basic amenities and measures to minimise environmental impact is made on the site.
Policy HO12: Alternative 1	No policy.



Policy HO12: Alternative 2	Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015).
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The Council has selected the preferred alternative option based on the updated definition in the Planning Policy for Travellers (2023) that seeks to ensure Travellers are treated equally and fairly through the planning process.

4.2.3 Local Economy Policies Alternatives

Table 4-13: Policy LE1 Alternatives

Policy LE1 Development Principles within Centres and Parades: Preferred	Outlines the council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.
Policy LE1: Alternative 1	Less restrictive policy.

The key reasons for selecting the preferred option are that it will provide a stronger policy basis to ensure an appropriate mix of uses are maintained within the town centres and new uses/development does not have a detrimental impact on vitality and viability of town centres. Further, it recognises the introduction of E class uses limits the Council’s ability to control uses within key areas of town centre (e.g. primary frontages) and it is more appropriate for policies to focus on outcomes.

Table 4-14: Policy LE3 Alternatives

Policy LE3 Industrial Land (Preferred at Regulation 18 stage)	Outlines the approach for assessing proposals to intensify, prevent the loss of and/or modernise floorspace and premises for industrial uses, within appropriate locations (Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs)).
Policy LE3: Alternative 1	Allow for the full range of appropriate industrial uses.
Policy LE3: Alternative 2 (preferred at Regulation 19 stage)	Supports the co-location of non-industrial uses on industrial land (e.g. Residential uses on LSISs, as well as mixed use schemes on non-designated industrial land).

Following the Local Plan Regulation 18 consultation process, the Council selected the option to include co-location of residential uses (i.e. Alternative 2 Regulation 18) on LSISs through Plan-led or Masterplan as the preferred alternative. This will enable an increase in the scope to deliver additional housing to address local needs, whilst balancing this with the need to protect and maintain a sufficient supply of employment floor space. It should be emphasised that the preferred policy would also be in conformity with the London Plan (2021).



4.2.4 Green Infrastructure Policies Alternatives

Table 4-15: Policy GI2 Alternatives

Policy GI2 Open Space: Preferred	Outlines the approach to protect, enhance and increase the provision of open spaces. Further, it includes a strict criteria to assess proposals that may result in the potential loss of open space, recreational facilities and playing fields, in exceptional circumstances.
Policy GI2: Alternative 1	More restrictive policy (i.e. not allowing new community infrastructure on open spaces/recreational buildings in exceptional circumstances).

The Council has selected the preferred policy option and recognises that it is important for the plan to protect, maintain, enhance the existing provision of open space provisions, particularly in areas where deficiencies may existing in the level of provision or access. This has positive effects on the health and wellbeing of communities, biodiversity and climate change resilience. Conversely, it recognises there may instances where applicants may need to demonstrate the potential loss of open space and recreational space/buildings, in exceptional circumstances; the delivery of new/enhanced community infrastructure.

Table 4-16: Policy GI3 Alternatives

Policy GI3 Biodiversity: Preferred	Align With the Environment Act (i.e. 10% Biodiversity Net Gain).
Policy GI3: Alternative 1	Including the requirement for 15% biodiversity net gain

The draft Local Plan Policy GI3 was proposing to include a target requiring new developments to achieve a 15% Biodiversity Net Gain target (i.e. Alternative 1), at the Regulation 19 stage. However, the Local Plan Inspector has required a main modification to reduce this target to 10% Biodiversity Net Gain as there were concerns in relation to whether the higher target was justified by evidence. In line with this, the preferred policy selected is to achieve 10% Biodiversity Net Gain.

4.2.5 Climate and Nature Policies Alternatives

Table 4-17: Policy CN1 Alternatives

Policy CN1 Sustainable Design and Retrofitting: Preferred	Outlines that all new buildings should be designed and built to be net zero carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no gas connection, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings.
Policy CN1: Alternative 1	Development size threshold.



Policy CN1: Alternative 2	Approach to measuring zero carbon – Part L, Building Regulations.
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The key reasons for selecting the preferred policy option are that the Alternative 1: threshold approach would only apply to major development proposals (i.e. 10 units +). This would undermine the strategic intent of the policy for all buildings to meet Net zero and result in a large proportion of housing supply that is expected to comprise of small sites (i.e. below 0.25h under London Plan Policy H2) to not meet the net zero development requirement. Hence, the preferred approach ensures all building will be required to achieve net zero development, to minimise carbon emissions and future proof buildings. Alternative 2 would be a continuation of apply London Plan and Part L of the building regulations to define and measure carbon/net zero. The weakness with this approach is that it is a narrow definition of net zero (i.e. 65% offset) and only considers regulated emissions (i.e. excludes equipment/appliances). The key advantages of the preferred policy are it will consider all energy uses in the building and seeks to achieve a balance between energy use and on-site renewable energy generation (i.e. zero carbon), only allowing offsetting to address a potential imbalance. This is more robust, as it sets absolute targets (i.e. absolute energy use) which can be checked and verified against actual (metered) energy usage in the occupied building after completion, compared to Alternative 2.

No reasonable alternatives were identified for 44 of the Local Plan policies. This was because these policies were drafted to be consistent with national policy and in general conformity with the London Plan.

4.3 Choice of Local Plan Allocations

Site allocation options have been identified by LBHC with the intent of meeting the Borough's identified housing requirement over the plan period, including a buffer to accommodate potential under-delivery. Site options have also been identified, where required, to accommodate additional non-residential and infrastructure development to meet identified need.

41 sites were identified through the site selection process and were subject to IIA. One site (Marsh Lane Gasholder site (O19)) was removed from the Local Plan through the Proposed Main Modifications because the Inspector concluded it was not available for housing. All of the remaining 40 reasonable alternative sites have been included within the Local Plan as allocations. The IIA contributed to the wording of the development requirements for some site allocations, as detailed in **Section 3.0**.



5.0 Monitoring Significant Effects

The SEA Regulations require monitoring of the significant environmental effects of the implementation of a plan. IIA monitoring should cover the significant economic and social effects, as well as the environmental effects.

The Local Plan includes a monitoring strategy containing performance indicators and targets by which the progress of the plan will be monitored and which will be reported on through the Local Plan Annual Monitoring Report (AMR).

The final IIA monitoring programme presented in **Table 5-1** has been refined to focus specifically on the monitoring of residual significant negative and uncertain effects of the Local Plan.

Table 5-1: Proposed Monitoring Indicators

IIA Objective	Policy and Site Reference	Proposed Monitoring Indicators
IIA1 and IIA2	Wealdstone Parole Office, Hatch End Telephone Exchange, North Harrow Methodist Church, West Harrow Conservative Association Poet's Corner & Milton Road, Travis Perkins Wealdstone, Havelock Place and 15-29 College Road.	<ul style="list-style-type: none"> Net additional retail, cultural, leisure, visitor and other town centre floorspace provided within town centre boundary. Total amount of office floorspace across the Borough and any change. Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS.
IIA3	Strategic Policy 10: Movement	<ul style="list-style-type: none"> Number of new facilities provided with development. The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development. Number of new disabled parking spaces delivered.
IIA3	Watling Farm	<ul style="list-style-type: none"> Improvements in sustainable transport options accessible from this site. Improvements in access to facilities from this site.
IIA4	15-29 College Road	<ul style="list-style-type: none"> Change in social infrastructure provision or improved access to it.
IIA5	Strategic Policy 04: Local Economy Policy LE1: Development Principles within Centres and Parades	<ul style="list-style-type: none"> Tenure mix of new affordable housing units relative to identified local need. Off-site affordable housing contributions secured in lieu of on-site provision. Net additional dwellings delivered within Harrow and Wealdstone Opportunity Area. Net additional dwellings delivered within rest of Borough.



IIA Objective	Policy and Site Reference	Proposed Monitoring Indicators
		<ul style="list-style-type: none"> • Net additional family sized (3b/+) dwellings delivered.
IIA6	Harrow View Telephone Exchange; Pinner Telephone Exchange; and Watling Farm.	<ul style="list-style-type: none"> • The proportion of new dwellings/ employment uses within PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development.
IIA7	Policy SI3: Sports and Recreation	<ul style="list-style-type: none"> • Number of new noise and light pollution nuisance reports.
IIA12	Harrow School Estate & John Lyon School; Royal National Orthopaedic Hospital; and Watling Farm.	<ul style="list-style-type: none"> • Change in the total amount green belt or metropolitan open land. • No net loss in social and green infrastructure
IIA12	Policy SI3: Sports and Recreation	<ul style="list-style-type: none"> • Proportion of new sports development located on existing Metropolitan Open Land and other open space. • No net loss in social infrastructure
IIA13	Royal National Orthopaedic Hospital; and Watling Farm.	<ul style="list-style-type: none"> • Proportion of new development on Previously Developed Land (PDL).



Appendix A IIA Framework

London Borough of Harrow Council Local Plan

Integrated Impact Assessment Adoption Statement

London Borough of Harrow Council

Project No.: 430.000059.00001 / C0410

26 March 2026



Table A 1: IIA Framework

IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Economy and Employment	IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses	<ul style="list-style-type: none"> • support existing and new businesses within the Borough by encouraging innovation, diversification and good quality economic development? • support the provision of world class infrastructure and connectivity? • support flexible working practices? • protect and retain an adequate supply of employment floor space to address business needs? • enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use? • safeguard existing town centres? • maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment? • improve existing shopping facilities within town centres and neighbourhood parades? • support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space? • support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?
	IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole Borough	<ul style="list-style-type: none"> • create new jobs in high value sectors, including in the green sector? • encourage developers to demonstrate how they are investing in skills and employing local people?
Population and Equalities	IIA3 Accessibility: To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)	<ul style="list-style-type: none"> • ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including: <ul style="list-style-type: none"> • education facilities? • recreation facilities? • health services? • increase the delivery of new or enhanced community and health facilities?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
		<ul style="list-style-type: none"> • help ensure all children have access to a local school within reasonable walking distance? • increase education facility provision for children with learning disabilities? • ensure local facilities have capacity to accommodate proposed development? • ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity? • avoid an adverse/ discriminatory impact on protected characteristics/equality groups? • ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled, elderly, families with children?
Health	IIA4 Health and Wellbeing: Enable residents to lead a healthy, good quality life	<ul style="list-style-type: none"> • use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion? • ensure everyone has access to places to mix and meet such as community facilities (e.g. community halls and places of worship) and recreation facilities? • increase and improve opportunities for active travel including walking and cycling? • increase and improve provision of informal and formal recreation (e.g. swimming pool, sports centre) facilities? • ensure everyone has access to open space to help promote healthy lifestyles and wellbeing? • increase provision of private amenity space? • encourage the protection of allotments and encourage the delivery of new spaces to grow food? • ensure all representative groups will be consulted and engaged with?
Housing	IIA5 Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly,	<ul style="list-style-type: none"> • increase the number of additional homes delivered to meet local needs/targets? • increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)? • provide affordable homes of the tenure and size to meet the identified needs?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
	families with children and other vulnerable groups	<ul style="list-style-type: none"> • increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)? • increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children? • provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?
Transport and Accessibility	IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.	<ul style="list-style-type: none"> • ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport? • encourage intensification in existing residential areas in the most accessible locations within the Borough? • improve existing cycling and walking network and provide new routes? • increase and improve opportunities to access public transport including where there are existing issues (such as steps)? • reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?
Air, Noise & Light	IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions	<ul style="list-style-type: none"> • ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development? • avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?
Climatic Factors	IIA8 Minimising Contributions to Climate Change: To reduce the Borough's contribution towards the emission of climate change gases	<ul style="list-style-type: none"> • support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)? • support the shift towards usage of electric and ultralow emissions vehicles? • promote a low carbon local economy? • ensure new developments are energy efficient? • minimise greenhouse gas emissions?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
	IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability	<ul style="list-style-type: none"> • minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage? • ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity? • encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the Borough and within the wider area?
Biodiversity, Geodiversity, Flora & Fauna	IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	<ul style="list-style-type: none"> • avoid adverse effects on European designated habitats sites? • conserve, enhance and repair nationally and locally designated wildlife sites? • conserve, enhance and repair natural and semi natural habitats? • contribute to the delivery of new or safeguard existing BAP priority species and habitats? • achieve biodiversity net gain (BNG) in new developments? • provide new or improved access to greenspaces? • contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the Borough)? • protect sites of geological importance?
Cultural Heritage	IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings	<ul style="list-style-type: none"> • conserve and/or enhance heritage assets, historic environment, and their settings? • maintain and enhance access to cultural heritage assets? • ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context? • contribute to the better management of heritage assets and contribute to conserving heritage at risk? • improve the condition of the historic environment? • encourage heritage-led regeneration? • help provide solutions to those assets on the Heritage at Risk register?



IIA Topic	IIA Objective	Assessment Question. Does the policy or option...?
Landscape and Townscape	IIA12 Landscape and Townscape: To conserve and enhance the Borough's landscape and townscape character	<ul style="list-style-type: none"> • respect, maintain and strengthen local landscape and townscape character and distinctiveness? • promote high quality and contextually successful design? • avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact? • protect sensitive areas and protected views? • safeguard landscape and townscape features such as trees?
Soils, Water & Minerals	IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources	<ul style="list-style-type: none"> • seek to improve or remediate contaminated land or reuse previously developed land which has not been restored? • avoid development of greenfield land? • promote the efficient use of minerals? • protect soil quality and avoid soil pollution? • ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments? • protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies? • Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?
Waste	IIA14 Waste: To minimise waste	<ul style="list-style-type: none"> • encourage new developments to provide adequate space for waste separation? • encourage the repurposing and refurbishing of buildings, instead of demolition? • ensure waste is dealt with in line with circular economy principles? • safeguard existing waste management sites?



