



Technical Memorandum

To:

London Borough of Harrow Council

cc: Mohammed Azram and David Hughes

From:

SLR Consulting Limited

Date: 19 January 2024

Project No. 430.000059.00001

RE: Local Plan IIA, Preferred Policies and Alternatives Assessment Findings, Draft Technical Note

1.0 Introduction

This memo sets out the methodology and draft findings of the Integrated Impact Assessment (IIA) of the preferred Local Plan policies and their alternatives. The IIA is a combination of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) requirements. It identifies potential impacts on protected groups and health outcomes and helps to identify opportunities within the power of the Local Plan for more positive outcomes for protected groups and health. In addition, the Habitats Regulation Assessment (HRA) screening will be reflected in the IIA Report and in a separate HRA Screening Statement.

An IIA Framework (see Appendix 1) was developed in the first stage of the IIA (Stage A: Scoping) to provide a set of objectives against which to identify the potential positive, negative, health, equalities, environmental, economic and social effects of the Local Plan policies and their alternatives. The overall aim of the IIA is to maximise the potential positive effects; minimise or mitigate potential negative effects and uncertainty; and to promote sustainable development.

This memo provides a summary and commentary of the relative performance of the preferred policies and their alternatives, providing information to London Borough of Harrow Council (LBHC) officers to inform discussions with Members. The assessments have been undertaken in detailed excel spreadsheets which will be provided to officers for review, at a future date. The IIA findings will therefore be refined over the coming weeks as the detailed assessment is reviewed and finalised with officers.

2.0 Methodology

The IIA is now in the second stage (Stage B: Options Assessment). Preferred policies for the Local Plan were provided to SLR in chapters. Reasonable alternatives to the draft Local Plan policies have also been assessed, where they have been identified in discussion between SLR and Council officers. 60 policies and 43 alternatives have been assessed in total. There may be ongoing amendments to the policies prior to consultation. These are likely to be related to clarity around drafting, factual updates and supporting text but not the policy positions themselves.

All policies and alternatives have been subject to assessment against the IIA Framework which can be found in Appendix 1. Assessments have been undertaken using detailed assessment matrices in Excel format. One matrix has been completed per policy. Where an alternative is sufficiently different to the preferred policy, it has been assessed using an assessment matrix in the same way as the preferred policy and to the same level of detail. Where an alternative is not sufficiently different to the preferred policy and an assessment would result in the same performance against the IIA Framework, a commentary has been provided by the assessors to explain this and discuss the differences between the preferred policy and the alternative.

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The assessments of the policies and any alternatives have been undertaken by skilled and experienced assessors, using their professional judgement and with reference to baseline data from the Borough. The assessors consider specific requirements of the SEA Regulations including whether a potential effect could be indirect/direct, permanent or temporary, replaceable/irreplaceable, and the potential magnitude and duration. Table 2.1 explains how this is considered and how significance has been determined within the assessments by the assessors.

Mitigation measures have been put forward within the assessment tables to address potential negative and uncertain effects. These measures are intended to either offset a potential negative effect, reduce uncertainty or reduce the significance of a potential negative effect. Enhancement measures have also been put forward within the assessment tables to improve performance where either neutral or positive effects have been identified. Mitigation and enhancement measures will be provided to officers within the assessment tables and will also be presented within the IIA Report which is being prepared for consultation.

The IIA findings will continue to be refined as policies are amended as a result of consultation, further evidence and feedback within the IIA process.

Table 2.1: Significance definitions		
Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
++	Significant Positive Effect: the option or policy supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> enhance and redefine a location in a positive manner, making a contribution at a national or international scale; enhance and redefine a location in a positive manner; repair or restore receptors badly damaged or degraded through previous uses; and/or improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	Minor Positive Effect: the option or policy supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could: <ul style="list-style-type: none"> improve undesignated yet recognised receptor qualities at the neighbourhood scale; fit into or with the existing location and existing receptor qualities; affect a localised receptor; and/or enable the restoration of valued characteristic features partially lost through other land uses.
0	Neutral Effect: the option or policy has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A

Table 2.1: Significance definitions		
Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
?	Uncertain Effect: Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	Minor Negative Effect: the option of policy appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects	<p>Reversible</p> <p>Infrequent or intermittent</p> <p>Magnitude: Low 20-40% of receptor or capacity affected.</p> <p>The size, nature and location of a proposed scheme could:</p> <ul style="list-style-type: none"> • be out of scale with the location; • affect a localised receptor; and/or • leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	Significant Negative Effect: the option or policy works against the achievement of this objective; it does not address relevant assessment questions; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	<p>Permanent</p> <p>Irreversible</p> <p>Continual</p> <p>Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected</p> <p>The effect could be:</p> <ul style="list-style-type: none"> • to permanently degrade, diminish or destroy the integrity of the receptor; • to cause a very high-quality receptor to be permanently changed and its quality diminished; • not fully mitigable and may cumulatively amount to a severe adverse effect; • at a considerable variance to the location, degrading the integrity of the receptor; and/or • substantially damaging to a high-quality receptor such as a specific regional or national designation.

2.1 Assessment Assumptions

Assumptions made have been recorded within the detailed assessment matrices. For example, for some alternatives, it has been assumed that the preferred policy forms the basis of the alternative policy wording, with only limited amends to certain parts of a policy or additional criteria being added.

A general assumption made during the assessments is that all of the preferred policies would be taken forward as proposed and that the policies within the Local Plan will not be considered on their own. More detail on the assumptions made in the assessments will be included within the IIA Report currently being prepared for consultation.

2.2 Assessment Limitations

No site allocation options or preferred site options are available at the time of writing. Therefore, the preferred policies and any reasonable alternatives have been assessed using strategic spatial information (such as set out within the Spatial Strategy policy) and in the absence of any locally specific information on site allocations. This has limited the identification of the potential full effects of policies relating to the spatial strategy, housing and economic growth. Site allocation options and preferred options will be subject to IIA later in 2024.

3.0 Assessment Findings

The summary tables in this section present the sustainability performance of the 103 policies and alternatives of the draft Local Plan. The policies are arranged within the following chapters and this section uses the same structure:

- Spatial Vision
- High Quality Growth
- Heritage
- Housing
- Local Economy
- Community Infrastructure
- Green Infrastructure
- Climate and Nature
- Waste and Circular Economy
- Movement

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 3.1.

Table 3.1: Key to Sustainability Significance Scores	
Potential Sustainability Effect	Symbol
Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	--

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.

A discussion of the performance of the policies within each chapter is provided under each summary table. The discussion also compares the performance of any reasonable alternatives identified and assessed.

Details of the policies and alternatives included within this memo can be found in Appendix B.

3.1 Performance of Spatial Strategy Policy and Alternatives

The Spatial Vision chapter includes one Spatial Strategy policy, as shown in the summary table below. Two alternatives to the spatial strategy have also been assessed.

Table 3.2: Summary of Spatial Strategy Policy and 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	+	+	+	+	0
<i>Spatial Strategy: Alternative 1</i>	++	+	+	+	++	++	0	0	0	+	+	++	+	+
<i>Spatial Strategy: Alternative 2</i>	++	+	+	+	++	++	+	+	0	--	--	--	--	0

The Spatial Strategy policy generally performs well, with potential significant positive effects being identified in relation to IIA1 (Economy), IIA5 (Housing) and IIA6 (Sustainable Travel) for both the policy and its two alternatives. Potential significant positive effects have also been identified in relation to IIA4 (Health and Wellbeing) and IIA12 (Landscape and Townscape) for Spatial Strategy Alternative 1. Spatial Strategy Alternative 1 may have a more significant positive effect on IIA12 (Landscape and Townscape) as the policy text is more restrictive than the preferred policy text in terms of safeguarding vulnerable areas from development. For example, the text of Spatial Strategy Alternative 1 safeguards suburban areas as areas of low density, family housing in order to protect suburban character, as well as protects the Borough's Metropolitan Open Land, Green Belt and other open space (including gardens) from development. This has resulted in a more positive performance of the Spatial Strategy Alternative 1 in relation to IIA12 (Landscape and Townscape) compared to the preferred policy. Although the rest of the preferred Local Plan policies do place restrictions on these matters it is not reflected so clearly within the preferred Spatial Strategy Policy text. It is therefore suggested

that should the text of the preferred Spatial Strategy Policy be amended and more detail on restrictions added, the policy could perform more positively in relation to IIA12 (Landscape and Townscape).

Four potential significant negative effects were identified for Spatial Strategy Alternative 2 in relation to IIA10 (Biodiversity and Geodiversity), IIA11 (Historic Environment), IIA12 (Landscape and Townscape) and IIA13 (Water and Soil). This alternative seeks to go beyond the level of development identified in the proposed strategy and provide more employment, retail and cultural / leisure floorspace. As a result, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact efforts to conserve and enhance biodiversity and the historic environment, as well as protection of landscape/townscape character and natural resources.

3.2 Performance of High Quality Growth Policies

The High Quality Growth chapter includes twelve preferred policies, as shown in the summary table below. Three alternatives to the preferred policies have also been assessed.

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 01: High Quality Growth	++	0	0	+	0	+	0	0	?	0	+	++	0	0
GR1 Delivering High Quality Design	0	0	+	+	0	?	++	?	?	+	+	+	?	?
GR2 Inclusive Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0

Table 3.3: Summary of High Quality Growth Policies Assessments														
GR3 Public Realm and Connecting Places	0	0	+	+	0	+	+	+	+	0	+	+	0	0
GR4 Building Heights	+	0	0	+	+	0	0	0	0	0	+	++	0	0
GR5 View Management	0	0	+	0	0	0	0	0	0	0	0	++	0	0
GR6 Areas of Special Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
<i>GR6 Areas of Special Character: Alternative 1</i>	0	0	0	?	0	0	0	0	0	-	-	-	0	0
GR7 External Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0
GR8 Shopfronts and Forecourts	+	0	+	+	0	0	0	0	0	0	+	+	0	0
GR9 Outdoor Advertisement, Digital Display and Hoardings	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10 Infill and Backland Sites, Back Gardens and Amenity Areas	0	0	+	+	+	+	0	0	0	+	0	+	0	+
<i>GR10 Infill and Backland Sites, Back Gardens</i>	0	0	0	-	-	0	0	0	0	0	0	-	0	0

Table 3.3: Summary of High Quality Growth Policies Assessments

<i>and Amenity Areas: Alternative 1</i>														
<i>GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 2</i>	0	0	?	+	?	?	0	0	0	+	0	?	0	+
GR11 Planning Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA1 (Economy) for Strategic Policy 01: High Quality Growth, IIA7 (Air, Light and Noise Pollution) for Policy GR1 Delivering High Quality Design and Policy GR9 Outdoor Advertisement, Digital Display and Hoardings and IIA12 (Landscape and Townscape) for Strategic Policy 01: High Quality Growth, Policy GR4 Building Heights and Policy GR5 View Management.

A number of uncertain effects have been identified in relation to Strategic Policy 01 High Quality Growth, Policy GR1 Delivering High Quality Design, GR6 Alternative 1, and GR10 Alternative 2. Mitigation measures have been identified for these uncertain effects; these are listed in the detailed appraisal matrices.

3.3 Performance of Heritage Policies

The Heritage chapter includes three preferred policies, shown in the summary table below.

Table 3.4: Summary of Heritage Policies 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 02: Harrow Heritage Assets	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1 Heritage Assets	+	0	0	0	0	0	0	+	+	+	++	++	0	0
HE2 Enabling Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA11 (Historic Environment) for Strategic Policy 02 Harrow Heritage Assets and Policy HE1 Heritage Assets and IIA12 (Landscape and Townscape) for Policy HE1 Heritage Assets.

3.4 Performance of Housing Policies

The Housing Policies includes thirteen preferred policies and thirty-one alternative policies. Due to the number of policies and alternatives for Chapter 4, the results are presented per policy below.

Table 3.5: Summary of Strategic Policy 03 and 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	+	+	0
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 1</i>	?	0	+	0	?	+	?	+	-	--	?	--	--	0
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 2</i>	0	0	+	0	-	+	0	0	0	0	0	0	0	0

Strategic Policy 03 performs well, particularly with regards to the provision of housing (IIA5), for which a potential significant positive effect has been identified. The inclusion of reference to the scale of development sites could further enhance this policy. The potential effect for IIA13 (Water and Soil) could be enhanced with the explicit mention of avoiding greenfield land where possible for future development within the policy.

Conversely, Strategic Policy 03 Alternatives 1 and 2 do not perform as positively as the preferred policy, as Strategic Policy 03 Alternative 2 may not meet the identified need and Strategic Policy 03 Alternative 1 could be undeliverable due to the greater levels of development required.

Table 3.6: Summary of Policy HO1 and 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
<i>HO1 Dwelling Size Mix: Alternative 1</i>	0	0	+	+	--	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 2</i>	0	0	+	+	-	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 3</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 4</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0

Policy HO1 Dwelling Mix is a generally positively performing policy which will help to ensure a mix of dwellings sizes are created to meet the needs of Harrow's residents. Therefore, a potential significant positive effect has been identified for IIA5 (Housing). There is potential to enhance the minor positive effects identified for IIA3 (Accessibility) and IIA4 (Health) through the inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties.

The alternatives to this policy perform similarly, except for the housing objective (IIA5) due to the nuances between them. Whilst an uncertain effect has been recorded for HO1 Alternatives 3 and 4, and a potential significant negative for Alternative 1, a minor negative effect has been identified for HO1 Alternative 2.

Table 3.7: Summary of Policy HO2 and 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	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</i>	0	0	+	?	?	+	+	0	0	0	+	?	+	+

Table 3.7: Summary of Policy HO2 and Alternatives Assessments														
<i>of Larger Dwellings: Alternative 2</i>														
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 3</i>	0	0	+	-	?	+	+	0	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 4</i>	0	0	-	+	++	-	+	?	0	0	+	+	+	+
<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	+	+	+	+

Policy HO2 Conversion and Redevelopment of larger dwellings seeks to control the redevelopment of larger dwellings into small flats and ensure family sized homes are retained and when conversions are permitted there is no net loss in family housing, therefore a potential significant positive effect has been identified for IIA5 (Housing). The minor positive effect identified for IIA4 (Health) could be enhanced through wording

within criterion 3e which requires development to achieve excellent environment in relation to privacy, daylight, sunlight, outlook and exposure to external noise.

HO2 Alternatives 1-5 do not perform as positively as the preferred policy option. There is potential for HO2 Alternative 6 to result in potentially positive effects, as this would target redevelopment in appropriate locations and protect family sized dwellings in areas which need them most. However, further investigation is needed in order to understand the precise locations for the application of HO2 Alternative 6.

Table 3.8: Summary of Policy HO3 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
Policy HO3 Optimising the Use of Small Housing Sites	0	0	+	+	+	+	0	0	0	+	0	+	0	0

Policy HO3 Optimising the use of small housing sites performs positively across all IIA objectives, with no significant positive or negative effects identified. A potential enhancement measure has been identified in relation to IIA10 (Biodiversity and Geodiversity; the expansion of criterion 3e to consider connections with adjoining sites or expansion of existing GI on those sites, which could help to increase the network of habitats within the Borough.

Table 3.9: Summary of Policy HO4 and 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

Policy HO4 Genuinely Affordable Housing aims to increase the affordable housing available within the Borough, therefore there is potential for a significant positive effect to occur in relation to IIA5 (Housing). There is some uncertainty regarding total provision of affordable housing as Policy HO4 contains some criteria which allow for affordable housing not to be provided when this is unviable. However, in such a case, market housing would be provided which will still support housing provision across the Borough and therefore an overall potential significant effect is identified. It is noted that the alternative to the proposed policy does not perform as favourably, as this option puts a greater emphasis on intermediate products rather than low-cost rental affordable housing for which there is a greater need in Harrow.

Table 3.10: Summary of Policy HO5 and 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
<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

Policy HO5 Housing Estate Renewal and Regeneration sets out the criteria for regeneration of estates within the Borough. The proposed policy has potential for a significant positive effect on IIA6 (Sustainable Travel) due to the need for good active and public transport links and IIA4 (Health) through providing a healthy living environment and better quality housing. However, a potential minor negative effect has been identified in relation to IIA3 (Accessibility) as the proposed policy allows for the loss of some external amenity space. Such loss is allowed, however, in order to ensure that redevelopments can work in practice. It is recommended that the policy should make it clearer that quality improvements would be sought to remaining amenity space.

An uncertain effect has been identified for IIA5 (Housing) this because further clarity is needed regarding the rights of returning residents and potential net affordable dwelling loss. Several potential effects could also be enhanced – IIA6 (Sustainable Travel), IIA8 (Climate Change Adaption) and IIA10 (Biodiversity and Geodiversity). Measures include the addition of public transport access within estates, the inclusion of low carbon and energy efficient design within dwellings and a new criterion requiring the maintenance of existing (and creation of new) biodiversity and green infrastructure, particularly where this connects to neighbouring sites.

HO5 Alternative 1 is not to have a specific policy on housing estate renewal and regeneration, which does not perform as favourably. HO5 Alternative 2 requires the re-provision of external amenity space and this is the primary reason why it performs more favourably than the proposed policy. However, it could result in a lower level of provision of affordable housing, hence an uncertain effect is identified for IIA5 (Housing).

Table 3.11: Summary of Policy HO6 and 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 HO6 Accommodation for Older People	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</i>	0	0	+	+	?	+	0	+	0	0	0	0	0	0

Table 3.11: Summary of Policy HO6 and Alternatives Assessments

*for Older People:
Alternative 3*

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Policy HO6 Accommodation for Older People has performed positively. A potential significant positive effect has been identified for IIA5 (Housing) as accommodation for older people will be created within the Borough – a key issue for the lifetime of the Local Plan. The inclusion of wording within this policy to maintaining existing (or the creation of new) links to public transport could help to further the positive effect identified. None of the three alternative policy options perform as positively as the proposed policy.

Table 3.12: Summary of HO7 and 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	+	+
<i>Policy HO7: Supported and Sheltered Housing: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0

Policy HO7 Supported and Sheltered Housing makes provision for supported and sheltered housing across the Borough, including provision for the adaptation of existing dwellings. A potential significant positive effect has been identified in relation to IIA3 (Accessibility), as it makes provision for accessible housing of the right size and type for the intended user, such as by adapting homes for those with specific needs. This policy has also performed positively against several other objectives, although it is noted that there is potential for enhancement of the positive effects for IIA4 (Health) and IIA5 (Housing) with the inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing. Policy HO7 Alternative 1 performs similarly.

Table 3.13: Summary of Policy HO8 and 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

Policy HO8 Purpose Built Student Accommodation sets out requirements for purpose-built student accommodation (PBSA). The performance of this policy and the alternatives are mixed, as there is a lack of clarity surrounding the need for PBSA within Harrow. Further discussion with the planning officers into this need is required to mitigate the uncertain effects identified in relation to IIA5 (Housing). Potential minor negative effects have been identified for IIA4 (Housing) and IIA14 (Waste) for the preferred policy and both alternative policies. The policies do not provide for access to open space or green infrastructure, which could inhibit wellbeing as not all students will be able to afford paid-for recreation facilities to maintain physical and mental health.

Two reasonable alternatives to Policy HO8 Purpose Built Student Accommodation have been identified and assessed. HO8 Alternative 1 performs more negatively than the preferred policy, with potential minor negative effects being identified in relation to IIA3 (Accessibility), IIA4 (Health and Wellbeing), and IIA6 (Sustainable Travel). HO8 Alternative 2 performs only slightly more negatively, with a potential minor negative effect being identified in relation to IIA7 (Air, Light and Noise Pollution).

Table 3.14: Summary of Policy HO9 and 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	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 1</i>	-	-	0	-	-	-	0	0	0	0	0	-	0	-

Table 3.14: Summary of Policy HO9 and Alternatives Assessment

<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	+

Policy HO9 Large Scale Purpose Built Shared Living outlines how large-scale purpose-built shared living (LSPBSL) will be considered in development proposals. The preferred policy and HO9 Alternative 2 both perform well relative to the other alternatives, with the least amount of negative or uncertain effects being identified.

A number of uncertain effects were identified across the policies and alternatives for IIA3 (Accessibility) for HO9 Alternative 4, and IIA5 (Housing) for the preferred policy and HO9 Alternatives 2, 3 and 4. HO9 Alternative 1 which is for no policy option to be implemented, performs the worst with a number of potential minor negative effects being identified.

Table 3.15: Summary of Policy HO10 and 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	+	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1</i>	0	0	+	0	-	+	0	0	+	+	0	+	0	-
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2</i>	0	0	+	+	-	+	0	0	+	+	0	-	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3</i>	0	0	+	+	-	+	0	0	+	+	0	-	0	+

Table 3.15: Summary of Policy HO10 and Alternatives Assessments

<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 4</i>	0	0	-	+	-	+	0	0	+	+	0	-	0	+
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Policy HO10 Housing with shared facilities (Houses in Multiple Occupation) sets out how Houses of Multiple Occupancy (HMOs) will be considered in development proposals. The preferred policy performs the most positively out of all of the policies/alternatives suggested for HO10, with no potential negative or uncertain effects being identified.

Table 3.16: Summary of Policy HO11 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
HO11 Self-build and Custom-build Housing	0	0	+	0	+	0	0	0	0	0	0	0	0	0

Policy HO11_Self-build and Custom-build Housing outlines how self- and custom-Build development proposals are considered for development across the Borough. The policy generally performs well, with a mixture of neutral and potential minor positive effects being identified.

Table 3.17: Summary of Policy HO12 and 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 1</i>	0	0	--	--	--	?	0	0	--	?	0	-	0	0
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 2</i>	0	0	--	--	--	+	0	0	+	?	0	+	?	+

Policy HO12 Gypsy and Traveller Accommodation Needs outlines how Gypsy and Traveller Accommodation needs are considered across the Borough. In the preferred policy, the Council aims to retain the existing site at Watling Farm but will support proposals for new sites and pitches providing that there is an identified need. The preferred policy generally performs well, with only two uncertain effects being identified for IIA10 (Biodiversity and Geodiversity) and IIA13 (Water and Soils). Although the preferred policy does not encourage development on Green Belt/Metropolitan Open Land or Sites of Importance for Nature Conservation, uncertain effects have been identified in relation to IIA10 and IIA13 as development on these areas is allowed in exceptional circumstances under the National Planning Policy Framework (NPPF). The precise nature of potential effects for IIA10 and IIA13 cannot be determined without details of the design and location of sites this policy could apply to.

The alternatives to Policy HO12 perform poorly in comparison to the preferred policy, with potential significant negative effects being identified for IIA3 (Accessibility), IIA4 (Health and Wellbeing) and IIA5 (Housing) for both alternatives. The assessment of HO12 Alternative 1 also identified a potential significant negative effect for IIA9 (Climate Change Mitigation). A number of uncertain effects were also identified for IIA6 (Sustainable Transport), IIA10 (Biodiversity and Geodiversity), and IIA13 (Water and Soil).

3.5 Performance of Local Economy Policies

The Local Economy chapter includes seven preferred policies, as shown in the summary table below. Three alternatives to the preferred policies have also been assessed.

Table 3.18: Summary of Local Economy Policies 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 04: Local Economy	++	++	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Policy 05: Harrow & Wealdstone Opportunity Area	++	+	+	+	+	++	0	+	+	+	+	+	0	0
LE1 Development Principles and	++	+	+	+	0	+	+	0	0	0	0	+	0	+

Table 3.18: Summary of Local Economy Policies Assessments														
Town Centre Hierarchy														
<i>LE1 Development Principles and Town Centre Hierarchy: Alternative 1</i>	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE2 Night-time and Evening Economy	++	+	0	0	0	0	+	0	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	+
LE 4 Culture and Creative Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5 Tourism and Visitor Accommodation	++	+	+	+	0	+	+	0	0	0	+	+	0	+

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA1 (Economy) for five of the policies. Potential significant positive effects have also been identified in relation to IIA2 (Employment) for Strategic Policy 04: Local Economy and IIA6 (Sustainable Travel) for Strategic Policy 05: Harrow & Wealdstone Opportunity Area.

The reasonable alternative to Policy LE1 Development Principles and Town Centre Hierarchy performs similarly to the preferred policy, however a potential minor positive effect for IIA1 (Economy) is identified instead of a potential significant positive effect, as a less restrictive alternative would not control or protect main centre uses, which may impact on the vitality and vibrancy of town centres.

Two reasonable alternatives to policy LE3 Industrial Land have been identified and assessed. LE3 Alternative 1 performs the same as the preferred policy. One uncertain effect was identified in relation to IIA1 (Economy) for LE3 Alternative 2. This alternative policy allows for the co-location of housing on Local Strategic Industrial Sites. It is uncertain what impact this may have on the economy as it is dependent on where the housing is located, the magnitude of impact this may have on industrial floorspace, and the types of industry impacted.

3.6 Performance of Community Infrastructure Policies

The Community Infrastructure chapter includes five preferred policies, as shown in the summary table below.

Table 3.19: Summary of Community Infrastructure Policies 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 06: Social and Community Infrastructure	+	+	+	+	0	0	0	0	+	+	0	0	0	0
C11 Safeguarding and Securing Social Infrastructure	+	+	+	++	0	+	+	0	0	0	0	0	0	+
C12 Play and Informal Recreation	0	0	+	++	0	0	0	0	+	+	0	0	0	0

Table 3.19: Summary of Community Infrastructure Policies Assessments

CI3 Sport and Recreation	+	+	+	++	0	+	+	0	0	+	+	+	+	0
CI4 Digital and Communications Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to the health IIA objective for three of the policies relating to social infrastructure, play and informal recreation and sports and recreation.

3.7 Performance of Green Infrastructure Policies

The Green Infrastructure chapter includes six preferred policies, as shown in the summary table below. Two alternatives to the preferred policies have also been assessed.

Table 3.20: Summary of Green Infrastructure Policies 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 07: Green Infrastructure	0	0	0	+	0	0	+	0	+	+	0	+	+	0

Table 3.20: Summary of Green Infrastructure Policies Assessments

GI1 Green Belt and Metropolitan Open Land	0	0	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
GI4 Urban Greening, Landscaping and Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
GI5 Food Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0

The policies within the Green Infrastructure chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA10 (Biodiversity and Geodiversity).

An uncertain effect has also been identified for GI2 Open Space, for IIA10 (Biodiversity and Geodiversity). This is because the requirements of the policy enhance biodiversity and natural capital, as well as access to biodiversity, whilst ensuring that there is no loss of access to natural greenspace from development. However, as the policy allows for the development of community infrastructure in exceptional circumstances, this could also cause harm to existing biodiversity. In order to mitigate for this uncertain effect, the policy should state that in circumstances where the development of community infrastructure is allowed for on Open Space, there must be no loss/harm to biodiversity, and that the development must meet the Biodiversity Net Gain of 20% as set out in Policy GI3.

Policy G12 Open Space performs well and could result in a number of minor positive effects. The reasonable alternative to Policy G12 performs slightly better than the preferred policy, as the preferred policy identified uncertainty in relation to IIA10 (Biodiversity and Geodiversity). This outcome is due to the alternative policy being more restrictive than the preferred policy; this restriction removes the uncertainty identified in the preferred policy relating to potential harm to existing biodiversity as a result of the development of community infrastructure in exceptional circumstances. However, the preferred policy G12 performs more positively with regards to community infrastructure provision.

Policy G13 Biodiversity performs well and could result in a significant positive effect for IIA10 (Biodiversity and Geodiversity). The reasonable alternative to policy G13 has been identified and assessed. G13 Alternative 1 performs the same as the preferred policy. The assessment notes that although both requirements will result in a significant positive result for IIA10 (Biodiversity and Geodiversity), G13 Alternative 1 is unlikely to benefit biodiversity to the same extent as the preferred option policy due to the requirement of a smaller biodiversity net gain for developments.

3.8 Performance of Climate and Nature Policies

The Climate and Nature chapter includes six preferred policies, as shown in the summary table below. Two alternatives to the preferred policies have also been assessed.

Table 3.21: Summary of Climate and Nature Policies 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 08: Responding to the Climate and Nature Emergency	0	+	0	+	?	++	+	++	+	+	0	0	+	+

Table 3.21: Summary of Climate and Nature Policies Assessments														
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
CN2 Energy Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0
CN3 Reducing Flood Risk	+	0	0	+	0	0	0	0	++	+	0	0	+	0
CN4 Sustainable Drainage	+	0	0	+	0	0	0	0	++	+	0	0	++	0
CN5 Waterway Management	0	+	0	0	0	0	0	0	+	+	0	0	+	0

The policies within the Climate and Nature chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA6 (Sustainable Travel), IIA8 (Climate Change Adaptation), IIA9 (Climate Change Mitigation) and (IIA13 Soil and Water).

An uncertain effect is identified for Strategic Policy 08 Responding to the Climate and Nature Emergency and CN1 Alternative 1 in relation to IIA5 which relates to housing. This is because the requirements of the policy might lead to increased developer costs and therefore affect delivery. To mitigate the uncertain effect, a viability assessment should be undertaken to ensure that the policy is deliverable.

Policy CN1 Sustainable Design and Retrofitting performs well and could result in a potential significant positive effect in relation to IIA8 (Climate Change Adaptation). Two reasonable alternatives to Policy CN1 have been identified and assessed. CN1 Alternative 1 would just focus on major applications / development proposals, (i.e. 10+ units) or the small site threshold (sites less than 0.25 ha in size). The assessment of CN1 Alternative 1 identified uncertainty in relation to IIA5 which relates to housing. The alternative may result in smaller site developments but there is uncertainty over how many smaller site development proposal may come forward within the Borough, hence the uncertain effect is identified. CN1 Alternative 2 requires all developments to achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions. CN1 Alternative 2 uses a different definition to the preferred policy approach and is therefore less stringent. It therefore performs less well with regards IIA8 (Climate Change Adaptation). Neither CN1 alternative performs as well as the preferred policy.

3.9 Performance of Waste and Circular Economy Policies

The Waste and Circular Economy chapter includes three preferred policies, as shown in the summary table below.

Table 3.22: Summary of Waste and Circular Economy Policies 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 09: Managing Waste and Supporting the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1 Reducing and Managing Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++
CE2 Design to Support the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	0	0	++

The policies within the waste chapter generally perform fairly well against the IIA objectives, although most potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. As would be expected, all three of the policies should result in potential significant positive effects with regards to IIA14 (Waste).

3.10 Performance of Movement Policies

The Movement chapter includes four preferred policies, as shown in the summary table below.

Table 3.23: Summary of Movement Policies 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 10: Movement	+	0	+	+	0	++	+	+	0	0	0	0	0	0
M1 Sustainable Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2 Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0
M3 Deliveries, Servicing	0	0	0	+	0	+	+	+	0	0	0	0	0	0

Table 3.23: Summary of Movement Policies Assessments

and Construction														
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All of the policies within this chapter of the Local Plan generally perform well, although many potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. Potential significant positive effects have been identified in relation to IIA6 (Sustainable Travel) resulting from Strategic Policy 10: Movement, Policy M1 Sustainable Transport and Policy M2 Parking.

4.0 Habitats Regulations Assessment

At this early stage in the IIA, Habitats Regulations Assessment (HRA) is integrated within the wider integrated assessment. The scope of the HRA was included within the IIA Scoping Report (Appendix B)(i.e. the Habitats Sites which will be considered in the HRA). The preferred policies within the draft Local Plan will be screened to identify whether the preferred policies could result in Likely Significant Effects (LSE) on the integrity of any of the Habitat Sites, in terms of its conservation objectives and qualifying interests.

The HRA process requires close working with Natural England in order to agree the process and outcomes and, if necessary, obtain information and agree mitigation proposals.

Each preferred policy will be screened to identify LSEs which could arise resulting from the policies in isolation and/or in combination with other plans or projects. The screening process is currently ongoing and will be discussed with officers over the coming weeks.

Details on the results of HRA screening will be presented in the IIA Report and in a separate HRA Screening Statement. Natural England will be consulted on the findings of the screening exercise presented within the IIA Report.

5.0 Next Steps

Detailed assessment matrices in an Excel format will be provided to officers for their comment after which amendments may be made to the assessments by SLR. Once agreed, the assessment findings will be presented within an IIA Report which will accompany the Regulation 18 draft Local Plan when it is consulted on.

Natural England will specifically be consulted on the findings of the HRA Screening.

Appendix A Agreed IIA Framework (for reference only, not for amendment)

Proposed IIA Objective	Assessment Question. Does the policy or option...?
<p>IIA1 Economy: To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses</p>	<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?
<p>IIA2 Employment: To create greater employment opportunities and higher value jobs for all ages across the whole borough</p>	<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?
<p>IIA3 Accessibility:</p>	<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:

Proposed IIA Objective	Assessment Question. Does the policy or option...?
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"> ○ education facilities? ○ recreation facilities? ○ health services? ● increase the delivery of new or enhanced community and health facilities? ● 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?
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?
IIA5 Housing:	<ul style="list-style-type: none"> ● increase the number of additional homes delivered to meet local needs/targets?

Proposed IIA Objective	Assessment Question. Does the policy or option...?
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, families with children and other vulnerable groups	<ul style="list-style-type: none"> • 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? • 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?
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?
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?

Proposed IIA Objective	Assessment Question. Does the policy or option...?
<p>IIA8 Minimising Contributions to Climate Change: To reduce the borough's contribution towards the emission of climate change gases</p>	<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?
<p>IIA9 Adaptation to Climate Change: Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</p>	<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?
<p>IIA10 Biodiversity: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.</p>	<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?
<p>IIA11 Historic Environment: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their</p>	<ul style="list-style-type: none"> • Conserve and/or enhance heritage assets, cultural and archaeological assets and features, 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?

Proposed IIA Objective	Assessment Question. Does the policy or option...?
settings and where appropriate improve the quality of the built environment	<ul style="list-style-type: none"> • contribute to the better management of heritage assets and contribute to conserving heritage at risk? • improve the quality and condition of the historic environment? • encourage heritage-led regeneration? • help provide solutions to those assets on the Heritage at Risk register?
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?
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?
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?

Appendix B Local Plan Policies and Alternatives

1.1 Introduction

This appendix sets out the alternatives considered as part of the Integrated Impact Assessment (IIA) undertaken on the Harrow Local Plan, as part of Stage B – Options assessment in the IIA. Not all policies have an identified alternative/s. Where a policy has an identified alternative/s, the preferred policy is reproduced below (at the time of writing 18/01/24) and the alternative/s are provided below it. Since undergoing assessment, minor grammatical amendments to policies and alternative/s have been undertaken; the policy positions have not changed, however.

1.2 Chapter 01: Spatial Vision and Strategy and Strategic Objectives

Spatial Vision

In the year 2041 Harrow will continue to be a thriving outer London Borough, helping London to grow sustainably while maintaining its own identity. There will be a resounding sense of pride in Harrow, it is a place that people want to live, work and visit.

Development will respect the character of the borough and its capacity to evolve over time.

The diverse Harrow community will benefit from an ever-improving quality of life, having a well-connected borough that provides excellent local access to a range of facilities, services, housing, employment, and nature.

Harrow will be a clean and safe borough where residents can settle in homes that suit the needs of their household and lifestyle.

Residents and businesses will benefit from the creation of sustainable neighbourhoods where housing, local services, employment, and facilities are within walking and cycling distance. Residents will be healthier and happier due to localised provision of goods and services.

Town centres will be revitalised through innovative measures adapting to their changing roles as places of leisure, arts and culture, in addition to work and retail hubs. Town centres will be exciting places for people to live should they choose.

The borough has been responding to the climate emergency and seeing the benefits of taking early action to improve our environment. New developments are energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents have cheap, clean energy.

Air quality will have significantly improved through shifts to sustainable transport and electric cars. Active transport and EV infrastructure has been bolstered to facilitate the transition. Recycling rates will be some of the best in London.

The borough will see increased rates of biodiversity through the protection and enhancement of existing green spaces, and the provision of additional spaces alongside development. The green belt and metropolitan open land will continue to be the lungs of the borough through enhancement projects.

Spatial Strategy: (note, quantum of development subject to ongoing evidence base work)

By 2041, new development and economic growth will provide 16,040 new low-carbon homes, create over X,XXX additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.

The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.

Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 5,000 additional new homes, and 1,000 additional new jobs.

Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.

Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates.

The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.

Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.

The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.

The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.

The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and playspace will have been made.

Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected.

North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

The vitality and character of Pinner High Street will have been preserved and enhanced.



In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.

Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres, and will have provided improved connectivity between Kenton Station and Northwick Park Station.

Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.

The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.

Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.

Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.

Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs.

Reasonable Alternatives

Alternative 1: Retain existing spatial strategy – the proposed spatial strategy is considered an evolution of the existing strategy, in that it directs the majority of growth to the Harrow and Wealdstone Opportunity Area. It is however considered that the current strategy needs updating to respond to increased housing targets in the London Plan and changes in the economy and broader society since the current the Core Strategy was adopted in 2012. It also needs to respond to environmental issues such as climate change and biodiversity.

Alternative 2: Seek to go beyond the level of development identified in the proposed strategy – such an approach would go beyond the minimum housing targets set for Harrow in the London Plan, and beyond the objectively assessed need for employment, retail and cultural / leisure floorspace. Such an approach would meet a greater proportion of the Borough's Objectively Assessed Housing Need (as calculated by the Government's Standard Methodology) for housing. To do so however would 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 / Metropolitan Open Land). It would however contribute to closing the gap between minimum London Plan housing targets for the borough and actual objectively assessed need and is considered a reasonable alternative, but not the Council's preferred option when the NPPF and London Plan are considered in their entirety.

Appendix C 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 GR4: Building Heights – no reasonable alternatives identified.

Policy GR5 View Management – no reasonable alternatives identified.

Policy GR6: Areas of Special Character – one reasonable alternative identified

- A. Proposals affecting an area of special character will be assessed regarding:
- a. The impact of the proposal upon the strategic value of the area of special character;
 - b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and
 - c. The protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

Reasonable Alternative 1: No Policy Option:

The draft policy seeks to protect the contribution that the elevated parts of the borough make to the distinctive local character of the borough. There is however no formal obligation under the NPPF nor the London Plan to include such a policy nor designate such areas on the Policies Map. It would therefore be a reasonable alternative not to include a policy / designation. Such an alternative would however impact on the Council's ability to set out expectations for development and protect the areas that have been identified within the borough as having special character, and by reason of their elevated nature, harm by new development is likely to be exacerbated over a wider area. Such an option is therefore not the Council's preferred option.

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.



Reasonable Alternatives:

Policy GR10: Infill and backland sites, back gardens and amenity areas- two reasonable alternatives identified

General

- A. Proposals on Infill, backland sites, [non-designated] open space, garden land and garage sites will only be acceptable where;
 - a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in;
 - b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].
 - c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1
 - d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.
 - e. Appropriate levels of car parking is provided commensurate to the scale of development, with servicing and refuse collection adequately addressed.
 - f. The proposal is accessible to all; and
 - g. Addresses any relevant supplementary guidance.

Infill Sites

- A. Proposals for gap sites located in an established street scene will be supported where they:
 - a. Demonstrate compliance with A (a-g) above;
 - b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and
 - c. Satisfactory servicing, waste and cycle storage is provided.

Backland Development

- B. Proposals that are located on backland sites will be supported where they;
 - a. Demonstrate compliance with A (a-g) above;
 - b. Provide satisfactory access to the development;
 - c. Ensure appropriate waste servicing can be provided; and
 - d. Ensure secure by design measures have been addressed.

Non-designated open space

- A. Proposals for new housing on non-designated open space will be supported where they;
 - a. Demonstrate compliance with A (a-g) above;
 - b. Ensure highway safety is maintained; and
 - c. Address any relevant supplementary guidance.

Garden land

- B. Proposals for new housing on rear gardens will be resisted unless they;
 - a. Demonstrate compliance with A (a-g) above; and
 - b. Form part of the comprehensive development of a number of plots.

E.1 Housing on individual rear gardens will not be supported.



Garage sites

- A. Proposals that seek to redevelop garage sites within a development will be supported where they:
- a. Demonstrate compliance with A (a-g) above; and
 - b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.

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.

1.3 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.



1.4 Chapter 04: Meeting Harrow's Housing Needs

Strategic Policy 03: Meeting Harrow's Housing Needs– two reasonable alternatives identified.

Housing delivery:

- 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2019/20 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough. Based on current estimates of Borough housing capacity from all sources, the 10-year housing delivery target will be met; and there may be a potential shortfall in the final phase of the Plan (.i.e. 10-15 yrs), but this will be fully addressed by the end of Plan period.
- 2 The London Plan (2021) includes a target to deliver a minimum of 3,750 (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029.
- 3 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations;
 - A Harrow and Wealdstone Opportunity Area: A minimum of 7,500 will be delivered through extant permissions and on allocated sites within the opportunity area.
 - B Rest of the Borough: A minimum of 2,500 will be delivered through extant permissions and on allocated sites across the rest of the Borough.
 - C Small Sites: A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.
 - D Windfall sites: Development of new housing on suitable sites (below/above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.
- 4 New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the Borough will change over time. Development within suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations.



Housing Choice

- 1 Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the Borough. This will be achieved through;
 - A Genuinely Affordable housing: Over the plan period the Council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be affordable to low-income groups. At least 70% of all these will be low cost rented housing and the remainder will be Intermediate products which will be genuinely affordable based on lower quartile/median housing costs and incomes of Harrow residents.
 - B Mix of Housing by size: A strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.
 - C Specialist older people housing:
 - (a) The housing needs of older people will be met through:
 - (i) Prioritising the delivery of new conventional residential accommodation in C3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.
 - (ii) The delivery of specialist older persons accommodation (C3) with different levels of support, and care home accommodation (C2). These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time
 - (iii) The delivery of low-cost rented extra care housing within older person accommodation schemes,
 - b) The Council will work positively with providers, to support the delivery of a minimum 980 units of specialist older person accommodation, comprising of 660 retirement housing units and 320 extra care housing units between 2022-32, to address the future needs of an ageing population. A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32.
 - D. Supported and specialist Accommodation: The Council will work positively with the relevant authorities such as the NHS and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The Council will seek to resist the loss of existing accommodation to other uses, unless the proposal is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the Plan.
 - E. Non-self-contained accommodation: The Council will support the provision of non-self-contained housing such as Houses in multiple occupancy (HMOs), Hostels, Large Scale Purpose-Built Shared Living (LSPBSL) or Purpose-Built Student Accommodation (PBSA). This is providing;
 - a. A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing
 - b. Proposals make a positive contribution to housing choice and create mixed and balanced communities.



- c. The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future Borough needs and support mixed inclusive communities.
- F. Self-build and custom build housing: The Council will support proposals, for self-build and Custom build housing, particularly community led schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovate design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the Development Plan, particularly in relation to the provision of affordable and family sized housing.
- G. Gypsy and Traveller accommodation: The Council will maintain the existing provision of Gypsy and Traveller pitches. A total of three additional pitches will be delivered between 2016 – 41. The existing identified needs, and if any additional needs arise, will be addressed within an existing site.

Estate regeneration

- 2 The Council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the Plan period. This will play an important role to :
 - a. Increase the provision of the right type., size, tenure of housing to address local needs and meet the strategic targets
 - b. Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents
 - c. Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme)
 - d. Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well- being of communities.
 - e. Ensure existing and new residential units achieve high quality design standards
 - f. Promote social interaction, cohesion between the residents to support mixed and inclusive communities.
 - g. Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life
- 3 The Council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm Estate regeneration scheme during the life of the Plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and Development Plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.

Safeguarding the existing housing stock

- 4 Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where:



- A. Sub-standard dwellings would be brought in line with London Plan space standards;
- B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of Local Plan policy H8;
- C. De-conversion of flats would create a family size home (3 bed or more)
- D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere.
- E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted.
- F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.

Implementation:

- 5 The Council will monitor the implementation of the Plan against the above targets, including through the use of the housing trajectory (Appendix XX) and the monitoring implementation framework (Appendix XX), to address future housing needs and maintain a five-land supply of deliverable sites.

Reasonable Alternatives:

Alternative 1: High housing growth

This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2020-41 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– two reasonable alternatives identified.

A. Dwelling size mix priorities

- 1 All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough’s housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities:
 - A. i) Ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites;
 - B. ii) the remaining dwelling size mix will be determined on a case-by-case basis having regard to:
 - a. Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (or successor documents) and local housing register;
 - b. Site size and its physical characteristics (including any identified constraints on the preferred housing mix);
 - c. Location of the site, the surrounding context, character (including town centre location) and the Public Transport Accessibility Levels;
 - d. Need to optimise housing output on previously developed land;
 - e. The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and
 - f. Potential for custom-build and community led schemes.



2 Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.

3 The smallest 2-bedroom dwellings for both market and affordable homes provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding.

B. Flatted developments

4 Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family members who may be disabled and elderly. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the scheme would result in a poor-quality living environment for families; based on the above criteria.

C. Housing schemes solely comprising of smaller units

5 Development proposals comprising solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site, will be resisted unless it can be suitably demonstrated that the housing provision:

- a. Is in an area with higher Public Transport Access Levels (i.e. PTAL 3-6); and
- b. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, which includes provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or
- c. Provides for a balance in the mix of unit sizes in the area; or
- d. Is the only housing format deliverable by reason of site size, site configuration or other development constraints, and where a studio unit is proposed.

6 An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.

D. Monitoring

7 The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned.

F. Through the Authorities Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will assist in informing the Council's consideration of dwelling mix on a site-by-site basis.



Reasonable Alternatives:

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.



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

- 1 To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of larger homes into smaller self-contained residential units (C3) where the criteria below are met:
 - a. The internal floor area of the existing dwelling should exceed 130m² (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed.
 - b. The conversion should provide at least one larger family sized home with a gross internal floor area of at least 74 m² and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home.
 - c. The site is within area of PTAL 3-6
- 2 Exceptions to criteria 1a and 1b will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely, and it could not reasonably be changed to overcome such deficiencies
- 3 Proposals will be required to;
 - a. Comply with the minimum internal space standards of the London Plan
 - b. Ensure the converted flat on ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities.
 - c. Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes;
 - e. Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise;
 - f. Make adequate arrangements for the provision of amenity space for future occupiers of the development;
 - g. Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers;
 - h. Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;
 - i. Ensure that the balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) does not detract from the appearance of the property or the street scene;
 - j. Make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access; , including safe and accessible cycle storage



- k. Ensure that levels of external activity would not be detrimental to residential amenity and character.
- l. Demonstrates compliance with any relevant supporting guidance
- 4 Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
- 5 Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused.
- 6 The Council will also apply the above criteria to any proposals for the demolition and redevelopment of a larger home to provide 2 flats and the housing mix policy will apply to proposals will result in three (or more) residential units

Reasonable Alternatives: .

Option 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.

Option 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..

Option 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.

Option 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.

Option 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.

Option 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 alternatives identified.

Targets

- 1 Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (E) below).
- 2 Proposals for major residential and mixed-use development (10 units or more) must demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing, as well as demonstrate all options have been explored to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Subject to the threshold approach, public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites, will all be required to deliver at least 50 per cent affordable housing on each site.
- 3 The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered:
 - a. Their contribution to the Borough’s strategic affordable housing target, subject to viability and application of the threshold approach.



- b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing.
 - c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, in line with the table below.
- 4 Development proposals will carry greater planning benefit ,where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan),
 - 5 Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.
 - 6 The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more dwelling units will be delivered taking into account of the following:
 - a. New residential units that are proposed which would result in an uplift in the overall number of units on the site;
 - b. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites; and
 - c. Exception to the above applies, if the applicant demonstrates ownership has changed and no relations with the original landowner/developer.

B. Tenure mix (see tenure products definitions in Appendix YY)

- 7 Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.

Reasonable Alternatives:

Table XXY: Identified needs by affordable housing tenure

Tenure of housing	% required
Low cost rented (Social rented or as per London Plan)	70%
Intermediate: Affordable home ownership and / or London Living Rent	30%
Total	100%

- 1 The Council will prioritise the delivery of social rented housing over other affordable housing products as these are most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix:



- a. The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing;
 - b. Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality;
 - c. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;
 - d. Evidence of meaningful discussions with Registered Providers which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing; and
 - e. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a range of household incomes to address local needs.
1. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and allocated to those on the waiting list in accordance with a local eligibility criteria.
 2. The affordable housing Community-led housing scheme products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.

C. Viability tested route

3. Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.
4. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance.

D. Offsite contributions

5. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
 - a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and
 - b. where off-site provision is proposed:
 - i. A higher level of affordable housing can be secured through provision on an alternative site;



- ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and
- iii. The provision will better support inclusive and mixed communities.

E. Vacant building Credit

1. The application of the Vacant Building Credit (VBC) is not appropriate in Harrow. The use of VBC will only be considered in limited circumstances, where applicants address the criteria below :
 - a. The building is not in use at the time the application is submitted;
 - b. The building is not covered by an extant or recently expired permission;
 - c. The site is not protected for an alternative land use; and
 - d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.
2. The affordable housing policy will apply to any net increase in the floor space of the vacant building.

F. Mixed and inclusive communities.

3. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).
4. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be 'tenure neutral' in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces.

Reasonable Alternatives:

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.

Development proposals involving the renewal and regeneration of the Borough's Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor's Good Practice Guide to Estate Regeneration. Proposals must ensure;

- A. There is no net loss of affordable housing floorspace, and
 - a). replaces like for like tenure and size; or
 - b). meets the needs of returning residents (subject to a decant strategy); or
 - c). complies with the Council's latest housing needs assessment; and
 - d). where developments seek to introduce market sale housing to enable the estate regeneration, any further uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan
- B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6).
- C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely Affordable housing; prioritising the need to deliver additional social rented housing.
- D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing
- E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities.
- F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land.
- G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan.
- H. Where a net loss of external amenity space is proposed, on a case by basis, consideration will be given in relation to;
 - a) The existing quantum/quality of external amenity space
 - b) Proposed quantum/quality of external amenity space
 - c) Other planning benefits arising as a result of the loss of external amenity space
- I. A sufficient level of play and informal recreation space is provided in line with the approach set out in London Plan policy S4 and local Plan policies
- J. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate.



- K. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living
- L. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated
 - 2 Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits.
 - 3 Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan
 - 4 The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate.
 - 5 The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme

Reasonable Alternatives:

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.

1. Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:
 - a) It is demonstrated they would meet an identified local need, particularly to enable older people to live independently
 - b) It would deliver specialist older people accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation
 - c) Affordable housing is provided in line with Policy HO5
 - d) it has adequately considered and addressed all design issues in Part 3 or Part 4 to ensure the accommodation is suitable for the intended occupiers;
 - e) it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement;
 - f) it is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers
 - g) it contributes to mixed and balanced communities.
 - h) Proposals consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies
2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
 - a) The proposal is for provision of self-contained units which address requirements for private internal space;
 - b) There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.
 - c) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
 - d) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
 - e) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
 - f) Appropriate wheelchair accessibility is provided. At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
 - g) Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities.



- h) The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community
 - i) Demonstrate how the range of type of units and their design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies
 - j) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles
 - k) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings¹
3. Care homes must demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- a) There is an appropriate balance of private residential space and ancillary space associated with the care required for the use
 - b) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
 - c) 100% of all habitable rooms are wheelchair accessible;
 - d) Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission;
 - e) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off;
 - f) Provision of accessible communal outdoor space for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
 - g) Adequate level and range of care facilities and support, communal areas/facilities (.i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site
4. The Council will resist development proposals which involves the loss of floorspace in specialist older peoples and care home accommodation unless:
- a) It can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow.; or
 - b) adequate replacement on-site accommodation will be provided that satisfies Part 3 or Part 4 or
 - c) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 3 or Part 4; or
 - d) It can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose



Reasonable Alternatives:

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 alternatives identified.

1. The Council will support proposals for the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups of the population; providing;
 - a. It is demonstrated the scheme will adequately address a specific local need
 - b. it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence,
 - c. It provides the necessary level of supervision, management and care/support, security and community safety (where necessary)
 - d. it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
 - e. Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted to
 - f. Proposals must consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies



- g. It contributes to creation of balanced, mixed and inclusive communities and would not result in the over concentration of supported and sheltered housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area.
 - h. . It complies with other relevant policies within the Development Plan
2. The Council will resist the loss of supported and sheltered housing unless:
 - (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group; or
 - (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and
 - (iii) it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard
 3. The Council will support proposals for; the alteration, adaptation, extension of dwellings to address the specific needs of household's members with a range of disabilities or specific housing needs (including to provide accommodation for carers or support workers) in order to enable an independent, healthy living environment and promote social inclusion. This is providing proposals shall also comply with other policies in the Development Plan.

Reasonable Alternatives:

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.

- 1 Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation (PBSA) will be supported providing:
 - a. It is demonstrated there is a local or strategic need for the proposal
 - b. Proposals for PBSA must be appropriately located:
 - i. on well-connected sites that are easy to access by walking, cycling and public transport;
 - ii. Within or at the edge (300m) of town centres¹, which benefit from good provision of shops, services, leisure and community facilities appropriate to the student population,
 - iii. Priority is given to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions



- c. The majority of the bedrooms in the accommodation are secured for use by students over the lifetime of the PBSA, via a nomination agreement with one or more specific higher education provider (HEP). This evidence must include confirmation the proposed rental levels for PBSA are supported by the linked HEP(s)
 - d. A range of accommodation types, including cluster flats with shared kitchen and bathroom facilities, unless it is demonstrated this would be inappropriate
 - e. h. It is well-designed, providing appropriate space standards and facilities and it is sustainable by virtue of being adaptable to alternative residential use or other appropriate town centre uses
 - f. A satisfactory site management and maintenance plan (secured by planning condition) covering the lifetime of the accommodation is agreed by the Council, to demonstrate an acceptable level of amenity and access to facilities for its occupiers and not give rise to unacceptable impacts on the amenities of the occupants of the accommodations and existing residents, neighbouring uses in the surrounding areas.
 - g. The level of PBSA proposals (individually or cumulatively) in a location should not;
 - i) result in the harmful overconcentration of PBSA within a given location and undermine mixed and inclusive neighbourhoods. This will have regard to the character of the area, mix of uses, potential impacts on neighbouring properties and residents within the surrounding area.
 - ii) compromise the delivery of conventional self-contained housing, particularly family and affordable housing to meet the Borough needs, in line with Strategic Policy HO3:
 - h. The maximum level accommodation is secured as affordable student accommodation on-site in line with Policy H15.
2. Proposals for any potential ancillary or temporary use of the accommodation during vacation periods should be designed at the outset of the scheme and should ensure;
- i. There is no adverse impacts or risks to the safety, welfare and amenities of the existing students and staff occupying the student accommodation, in compliance with any FE or Council policy/regulations
 - ii. There are adequate design measures to limit/restrict the movement of occupants of the PBSA, temporary /ancillary uses and distinguish between the permanent use
 - iii. There is not an over concentration of similar uses, which can impact the balance and mix of uses that can result in potential harmful amenity impacts
3. The loss of existing PBSA will be resisted unless it is demonstrated:
- (a) It no longer caters for current or future needs,
 - (b) It is unsuitable and unviable for operating within the existing use;
 - (c) the floorspace is replaced by another form of residential accommodation that meets other priority Local Plan housing requirements
 - (d) Exception to the above is if the scheme is proposing to replace an existing accommodation with equivalent floor space that meets modern standards .



Reasonable Alternatives:

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.

- 1 Proposals for large-scale purpose-built shared living (LSPBSL) will be supported where they comply with London Plan Policy H16 and the following requirements:
 - a) Proposal will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough
 - b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,
 - c) Proposals should be located within the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 5-6) that form part of the Opportunity Area
 - d) There must not be two LSPBSL schemes within a 250m walking distance of each other, to; avoid an over-concentration of similar uses. To justify a departure from this requirement, applicants will be required to demonstrate exceptional circumstances. Robust evidence will be required to demonstrate:
 - i) There is no appropriate alternative town centre use such as offices, and C1 hotels or mixed-use schemes (where relevant) that would be suitable and viable on the application site
 - ii) There is no appropriate alternative use for the site that would be suitable and viable (including C3 residential or a mixed-use scheme) and
 - iii) It would be unviable, unsuitable to have a LSPBSL scheme developed at a lower scale via multiple uses (preferably in two separate blocks of development) that incorporates part of a site/development for LSPBSL the remainder for alternative uses in line with criteria (i) and (ii) above
 - e) The LSPBSL scheme should not have a detrimental impact to;
 - i) Residential amenity of the neighbouring properties and surrounding area
 - ii) The character of the area
 - iii) The need to support and maintain mixed and inclusive communities
 - f) Proposal on sites with extant permission or allocated for self-contained dwellings will not be supported, to avoid compromise the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues



- g) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It must include;
 - i) Flexible workspaces,
 - ii) Public amenities (e.g. restaurants, cafes , leisure facilities) that are accessible to the wider public, to integrated it into the surroundings area, as well as develop inclusive and sustainable communities.
 - h) To support a circular economy, proposals must demonstrate a flexible design and layout, to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses without the need for demolition and rebuild
 - i) Proposal must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies
 - j) The applicant must provide a management plan , to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL . This will be secured by way of a S106 agreement.
- 2 The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)
 - 3 Affordable housing contributions will be required, in accordance with London Plan Policy H16
 - 4 The Council will resist any proposals that seek to reduce the quantity, type or access of amenity provisions included within LSPBSL, after permission has been granted.

Reasonable Alternatives:

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.

Development proposals for Houses in Multiple Occupation (HMO)^{1/} and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply criteria below:

- (1) It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities.
- (2) It does not result in the loss housing suitable for accommodation by families based on following:

A: Internal floor area should exceed 130m² (as originally built) and

B: It should not be located within a residential street or area that is characterised by family housing

- (3) There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area.
- (4) Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas.
- (5) It is well-designed, with appropriate number of rooms of an adequate size, facilities that provides a high-quality accommodation that satisfies the relevant standards for HMOs in the licencing regime¹, including the provision of adequate functional living spaces and layouts.
- (6) Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape.
- (7) It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise.



- (8) .It ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene;
- (9) Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.
- (10) It contributes to creating an inclusive community and would not result in the over concentration of HMO's/Hostels within a neighbourhood that would harm the mix, balance and well-being of communities. For HMO's, an over concentration is defined as an instance where three or more of the nearest ten properties are HMO's,(.i.e. 5 on each side of an application site, on the same side of the highway).
- (11) .The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members section of the community, unless
 - A. It is demonstrated there is no local need for the type of accommodation.
 - B. it is for a for a replacement provision at an equivalent or better standard
 - C. It is demonstrated to be unviable or unsuitable for addressing the needs of its users.
 - D. The replacement provision is addressing a more acute local need (e.g. affordable housing)

Large Purpose-built HMO developments

- (12) The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the best approach to meeting housing needs in the borough, and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must:
 - a) located within an accessible location to local facilities, services, transport in accordance with criteria 1
 - b) not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria 2 above .
 - b) prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area (in accordance with criteria 3). A sufficient evidence – including a detailed management plan – must be provided demonstrate this.
 - c) Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-9 above
 - d) A sufficient level, type, of communal facilities and spaces should be provided to adequately address the needs of the expected level of number occupants. These should not be located in too few locations, conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents, to foster friendships and a sense of community.
 - e) Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria 10.



Reasonable Alternatives:

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.

- 1 The Council seek to retain the existing Gypsy and Traveller site, at Watling Farm (0.5ha) to provide three additional pitches, to address future traveller needs, unless evidence shows it is no longer required.
- 2 The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout, design and contribute to meeting identified local needs and there is no capacity at the existing site at Watling Farm.
- 3 Proposals for new and replacement accommodation must make adequate provision for:
 - a). A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles
 - b). Satisfactory access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services
 - c) basic amenities, including as running water, sewerage/ drainage and waste management
 - d) A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health, public transport
 - e) Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas
 - f) Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.
 - g) Measures to minimise any potential impacts on the local environment, including any relevant policy designations for or adjacent to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations
- 4 Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a sites,
- 5 Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties

Reasonable Alternatives:

Alternative 1: Alternative approach would be 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)



The definition of Gypsy and Travellers (G & T) included within the PPTS (2015) excludes those who have ceased travelling permanently. Based on this definition, the West London Alliance GTANA (2018) identified no need to provide additional pitches during the period between 2016 -2033/41. The PPTS definition was subsequently successfully legally challenged based equality and discrimination grounds (2022), as it excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. In this context, identifying needs based on the PPTS definition is not the preferred option, but the Council will monitor any Government response to the successful challenge and adjust the approach to the definition and need figure used in the draft Local Plan policy..

The Council is still awaiting the publications of the GLA London wide GTANA and the findings of this in relation to future G & T pitches need, before determining which definition to utilise and need figure to include in the Plan, to address the accommodation needs of the Traveller community. This may result in additional reasonable alternatives.

1.6 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 alternatives identified.

Proposals for new retail, leisure and cultural development in out of centre locations will be resisted. Any such out of centre developments must;

- a. Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites;
 - b. Be supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment.
 - c. Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network
- H. The release of office floorspace will be supported where the sequential approach below has been followed:
- a. Vacant floorspace outside of designated town centres;
 - b. Vacant floorspace within designated Major, District or Local Town Centres.
 - c. Poor quality floorspace within designated Major, District or Local Town Centres; and
 - d. Floorspace within the Harrow Metropolitan Town Centre;
- H.1 Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12 month period for office use or other appropriate employment or community uses.



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

Policy LE3 Industrial Land – two reasonable alternatives identified.

The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan.

A. Strategic Industrial Locations (SIL)

- a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below;
 - 1) General Industry (B2) and similar Sui Generis uses
 - 2) Storage and logistics/distribution (Use Class B8)
 - 3) Secondary materials, waste management and aggregates
 - 4) Utilities infrastructure (such as energy and water)
 - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
 - 6) Wholesale markets
 - 7) Emerging industrial-related sectors
 - 8) Flexible (B2/B8) hybrid space to accommodate services
 - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the wider SIL.
- c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
- d. Any net loss of industrial floorspace and premises within a SIL will not be supported, and
- e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.

A.1 Co-location of residential within a SIL will not be supported.

B. Locally Significant Industrial Sites (LSIS)

- a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below;
 - 1) General Industry (B2) and similar Sui Generis uses
 - 2) Storage and logistics/distribution (Use Class B8)
 - 3) Secondary materials, waste management and aggregates



- 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
 - 6) Wholesale markets
 - 7) Emerging industrial-related sectors
 - 8) Flexible (B2/B8) hybrid space to accommodate services
 - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the LSIS.
 - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
 - d. Any net loss of industrial floorspace and premises within a LSIS will not be supported;
 - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- B.1 Co-location of residential within a LSIS will not be supported.
- C. Non-designated Industrial Land**
- a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan;
 - b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.
- D. Non-industrial uses on industrial land.**
- a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development.
 - b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.



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.

- A. The Council will support town centre developments that;
- a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade;
 - b. Are of a scale and intensity commensurate to the size and role of the centre or parade it is located within;
 - c. Provides an appropriate mix of uses within a shopping area or parade, ensuring an over proliferation of Sui Generis uses does not occur;
 - d. The ground floor would have an accessible and active frontage; and
 - e. Community facilities in town centres are able to be supported by the Council where compliant with Policy CI1.
- B. The Council will support mixed-use developments in town centres and parades where;
- a. The ground floor element complies with A;
 - b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between the two uses; and
 - c. Satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)).
- C. Residential uses on the ground floor in any town centres or neighbourhood parades will not be supported.
- D. The loss of appropriate town centre uses, community facilities and infrastructure from town centres will not be supported unless compliance with policy CI1 is demonstrated.
- E. Temporary events such as markets and entertainment uses will be supported where;
- a. They are supported with a management plan agreed by the Council; and
 - b. They do not impact on residential amenity or highway safety.

The Council will resist the loss of any employment, leisure or cultural uses within a neighbourhood parade that provides essential day to day amenities. The loss of such uses will only be accepted where adequate marketing has been undertaken.

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, this is not the preferred option.



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

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

1.7 Chapter 06: Community Infrastructure

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

Policy CI1: Safeguarding and Securing Social Infrastructure – no reasonable alternatives identified.

Policy CI2: Play and Informal Leisure – no reasonable alternatives identified.

Policy CI3: Sport and Recreation – no reasonable alternatives identified.

Policy CI4: Digital and Communications Infrastructure – no reasonable alternatives identified.

1.8 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 alternatives identified

- A. Development proposals must:
 - a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space, particularly in areas of deficiency;
 - b. Not result in the net-loss of publicly accessible open space;
 - c. Improve access to green space where possible, particularly in areas where deficiencies in access have been identified; and
 - d. Enhance biodiversity and improve access to biodiversity and natural capital.
- B. Major development proposals must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required.
- C. Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless:
 - a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
 - b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
 - c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
 - d. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.

Alternative 1:

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

Protection of Biodiversity & Natural Capital

- A. Biodiversity and natural capital must be protected and enhanced. Development proposals must be adequately evidenced and follow the Ecological Mitigation Hierarchy.
- B. Development proposals must not result in loss of, or pose direct or indirect negative impacts to:
 - a. Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees)
 - b. Sites nationally or internationally designated for nature conservation or geodiversity
 - c. Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire
 - d. Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to:
 - 1. LNRS areas;
 - 2. Sites of Importance for Nature Conservation/ Regionally Important Geological Sites;
 - 3. Areas of priority habitat;
 - 4. Populations of protected, priority or locally notable species;
 - 5. Important features (e.g. historic hedgerows);
 - 6. Green or blue corridors or other functional linkages within the local ecological network; and
 - 7. Ecosystem function or resilience.
- C. Development proposals that would increase deficiencies in access to nature will be resisted.

Biodiversity and nature recovery

- D. Development proposals should:
 - a. Conserve and enhance Harrow's biodiversity;
 - b. Utilise nature-based solutions to manage environmental pressures;
 - c. Strengthen the Borough's natural capital;
 - d. Improve access to nature where practicable; (link to deficiency in access)
- E. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:
 - a. A minimum of 2 biodiversity units per hectare;
 - b. A minimum net uplift in biodiversity unit value of 20%;
 - c. A minimum of one wildlife shelter (i.e swift box/bee brick etc.) per residential unit; and
 - d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).



Alternative 1:

One reasonable alternative to this policy is proposed. This policy requires a Biodiversity Net Gain of 20%. A reasonable alternative would be to align with the Environment Act and stipulate that a Biodiversity Net Gain of only 10% is required, this is the status quo for all local authorities. The Biodiversity evidence base shows that a Biodiversity Net Gain of 20% would be achievable for most developments without being too onerous or disproportionately impacting viability.

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

Policy GI5: Food Growing – no reasonable alternatives identified.

1.9 Chapter 08: Climate and Nature

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

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

New Buildings

- A. 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, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon.
- B. All new buildings should meet the following standards:

Space Heating Demand

- a. All dwellings should achieve a space heating demand of less than 15 kWh/m² GIA/yr; and
- b. All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m² GIA/yr;

Energy Use Intensity (EUI)

- c. Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m²GIA/yr;
- d. Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:



Building Typology	EUI Standard
Student or keyworker accommodation, care homes, extra care homes	35 kWh/m ² GIA/yr
Warehouses and light industrial units	35 kWh/m ² GIA/yr
Schools	65 kWh/m ² GIA/yr
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m ² GIA/yr
Hotels	160 kWh/m ² GIA/yr

Offsetting (as last resort)

- e. Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council’s offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.

Retrofit of Existing Buildings

- C. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use.
- D. Development proposals for major residential domestic refurbishment must achieve a certified ‘Excellent’ rating under the BREEAM Domestic Refurbishment 2014 scheme¹. or future equivalent, unless it can be demonstrated that it is not feasible.
- E. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified ‘Excellent’ rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible.
- F. Proposals for retrofit of existing buildings must consider impacts on the historic environment, heritage assets, and amenity of the building’s users and neighbours.

Alternative 1: Development size threshold (not the preferred option)

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 Regulations 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.

1.10 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.

Policy CE2: Design to Support the Circular Economy – no reasonable alternatives identified.

1.11 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 – no reasonable alternatives identified.

