

**Strategic Environmental
Assessment Statement
for
Harrow
Transport Local Implementation Plan
2019/20 – 2021/22**

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1. Introduction

- 1.1 This Strategic Environmental Assessment (SEA) statement is being produced to accompany the London Borough of Harrow's third Transport Local Implementation Plan 2019/20 – 2021/22 (LIP3).
- 1.2 The following reports provide the background to this statement:
- LIP3 Strategic Environmental Assessment scoping report
 - LIP3 Environment Report
 - Draft Harrow Transport LIP3
 - Adopted and final Transport LIP3
- 1.3 The *Local Implementation Plan* is a statutory document required by the Mayor of London. All boroughs are required to produce a Local Implementation Plan which demonstrates how each borough is implementing the Mayor of London's Transport strategy. In line with the regulations, LIP3 sets out all of the following:
- Harrow transport objectives
 - Harrow transport policies
 - Initial three-year programme of investment to be delivered over 2019/20 – 2021/22
 - How Harrow will work to deliver each of the Mayoral outcomes
 - How Harrow will work towards achieving the MTS priorities which are:
 - Healthy Streets and healthy people
 - A good public transport experience
 - New homes and jobs
- 1.4 statement.
- 1.5 This statement is being produced to show the reasons for the decisions made in the final transport LIP3 and thereby making this process more transparent.
- 1.6 The entire SEA process has ensured transparency in the environmental decisions made as well as ensuring that the full environmental impact of all options have been considered during the development of LIP3 and not just considered as an afterthought.

- 1.7 Table 1 shows the reports that have been prepared in advance of preparing this environmental statement.
- 1.8 This statement is being produced to show the reasons for the decisions made in the final transport LIP3 and thereby making this process more transparent.
- 1.9 The entire SEA process has ensured transparency in the environmental decisions made as well as ensuring that the full environmental impact of all options have been considered during the development of LIP3 and not just considered as an afterthought.

Table 1: Contents, purpose and timetable for SEA reports

Report	Purpose	Contents
LIP3 SEA screening	To determine whether or not the LIP3 required a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.	Description of geographical area, borough environmental issues and LIP3 possible environmental impacts and extent of impacts and environmental links with draft LIP3 objectives.
LIP3 SEA scoping	To ensure that the issues referred to in the SEA regulations as the 'significant environmental effects' are identified. The report sets out the context and objectives, establishes an environmental baseline and the scope of the assessment including consideration of alternative ways to deliver LIP3.	Reviews links with other plans and programmes relevant to producing LIP3, further identifies local environmental issues, identifies draft SEA environmental objectives, identifies baseline environmental data sources for objectives, tests links between LIP3 draft objectives and the SEA objectives and considers alternative objectives for delivering LIP3.
LIP3 SEA environmental report	Enables improved and effective consultation on the environmental components of LIP3. This also illustrated compliance with the SEA regulations.	Includes non-technical summary of the environmental report, considers environmental impact of not delivering LIP3, environmental impact of not receiving additional TfL funding, improves the baseline data identified in the scoping report, includes baseline data, considers and assesses alternative ways to deliver LIP3 draft objectives, assesses the significance of a selection of alternative ways to deliver LIP3 on population and human health and on air quality and the cumulative effects of the plan and also summaries changes made following scoping consultation.

2. The SEA process

- 2.1 The SEA has been designed to promote the consideration of environmental issues into every stage of the decision making processes. The SEA is an iterative process, thereby influencing and informing each stage of LIP3 development. In this instance, this was easily enabled because both the SEA and LIP3 documents were managed, prepared and overseen by the same people.
- 2.2 Table 2 shows the stages of the SEA process and timetable.

Table 2: SEA process and timetable

Process	Sent to:	Consultation Dates
SEA Scoping report The scoping report for the SEA for LIP3 was started at the same time as LIP3.	Statutory environmental consultees and all local environmental and heritage groups	6th July 2018 and 10th August 2018.
SEA Environmental Report Consultation took place alongside draft LIP3 consultation	Statutory environmental consultees and local environmental and heritage groups as well as transport consultees	17th September to 26th October 2018
SEA statement	Published on website	May 2019

- 2.3 Consultation on the draft LIP3 and the SEA Environmental Report took place together.
- 2.4 Statutory Consultees for the SEA were:
- The Environmental Agency
 - Natural England
 - Historic England
- 2.5 Other environmental groups consulted on the scoping report were as follows:
- Harrow in Leaf
 - Harrow Friends of the Earth
 - Harrow Natural History Society
 - Harrow Nature Conservation Forum
 - Pinner Local History Society
 - Herts and Middlesex Wildlife Trust
 - Harrow Heritage Trust
 - TfL

- 2.6 The results from the LIP3 scoping consultation were fed into the next stage of LIP3 and also into the environmental report and appropriate changes were made to various sections of both documents.
- 2.7 Consultation on the draft LIP3 was carried out using the Harrow consultation portal. This consultation included the SEA Environmental Report. Invites to participate were sent to the following organisations:

Government / statutory bodies

- Transport for London
- WestTrans
- Metropolitan Police Service
- London Borough of Hillingdon
- London Borough of Barnet
- London Borough of Brent
- London Borough of Ealing
- Three Rivers District Council
- Hertsmere Borough Council
- Hertfordshire County Council

Environmental organisations

- Historic England
- The Environment Agency
- Natural England
- Pinner Local History Society
- Harrow Friends of the Earth
- Harrow Heritage Trust
- Harrow in Leaf
- Harrow Natural History Society
- Harrow Nature Conservation Forum
- Herts and Middlesex Wildlife Trust

User groups and organisations

- Harrow Association of Disabled People
- Harrow Public Transport Users Association
- Voluntary Action Harrow
- London Travel Watch
- Freight Transport Association
- Harrow Cyclists
- The RAC
- The AA
- Road Haulage Association
- Brent and Harrow chamber of commerce
- Living Streets
- London cycling campaign
- London First
- London Taxi Drivers Association

- Sustrans
- Harrow BID
- Shopmobility
- British Motorcycle Federation
- Motorcycle Action Group
- ROSPA

Internal to Harrow Council

- Councillors
- Environmental Services
- Planning Services
- Regeneration
- Public Health
- Economic Development
- Housing
- Education
- Children Services
- Adult Services

- 2.8 Because the main focus of LIP3 is to implement the Mayor’s Transport Strategy, which itself has undergone a SEA and as a result of previous LIP documents, minimal environmental effects were identified in preparing the SEA.
- 2.9 The environmental report showed that there would be no significant adverse effects from introducing LIP3. It also showed that there were likely to be positive impacts on air quality and on human health and population.

3. Environmental changes made as a result of consultation

- 3.1 Because both of Harrow’s previous LIPs had undergone an SEA and both of these significantly influenced the development of LIP3, there were less significant changes to be made to LIP3.
- 3.2 Table 4 shows the environmental changes made to the SEA following the scoping report consultation.

Table 3: Environmental changes made to the SEA following scoping report consultation

Organisation	Comment / Change recommended	Change made in response / Officer response
The Environmental Agency	No comment	
Natural England	No comment	
Historic England	Suggested monitoring impact on historic environment	Added objective to address impact on the historic environment
TfL	Add information about recycling	Added to SEA objective: Promote recycling by encouraging responsible sourcing of materials as well as BES 6001 accreditation for appropriate suppliers
Harrow Nature Conservation Forum	Stress the importance of protecting local green spaces from development. Cycling should be supported for all the reasons outlined in the report.	Added the following from Harrow’s core strategy: Protect the Green Belt, Metropolitan Open Land, and Areas of Special Character And also added overarching policy objectives include: Resist any loss of Green Belt. Safeguard and enhance Metropolitan Open Land. Resist any net loss of open space and where possible seek to increase provision
Internal Harrow consultation	Not possible to measure m ² of increased grass verge and suggested an alternative	Changed to Square meterage of removed hard paving to introduce soft landscaping such as grass verges

3.3 Table 4 shows the environmental changes made to LIP3 following the LIP3 and scoping report consultation.

Table 4: Changes made to LIP3 following scoping report consultation

Organisation	Comment / Change recommended	Change made in response / Officer response
The Environmental Agency	No comment	No comment
Natural England	Does not consider that the plan poses any likely risk or opportunity in relation to statutory purpose, and so does not wish to comment on this consultation.	No change
Historic England	Advise that all proposals take into account their impact on heritage assets and archaeological potential. Importance in considering the environmental issues relating to pollution and emissions on those experiencing the historic environment, particularly the increase in environmental aggressors deriving from emissions.	New policy added: Ensure that all new public realm improvements and neighbourhood schemes consider their impact on heritage assets and their setting alongside the local archaeological potential as well as designated and non-designated assets. Included information on damage to enjoyment from emissions.
Other	Encourage more cycling, more modal shift, provide more cycle parking, do more to reduce road casualties, consider reallocation of road space, consider noise more, consider other types of freight delivery services	Included all these changes.

3.4 **Error! Reference source not found.** provides more information on consultation responses to the final LIP3 which contain an environmental aspect.

4. Alternative options and their significance

4.1 The significance of alternatives options was considered for all environmental aspects. However, because the impact of alternative options was considered not to be significant for

Biodiversity, flora and fauna, Water, Soil, Climate factors, Material assets, Cultural heritage and Landscape, only Population and Human Health and Air Quality were assessed further regarding their significance.

4.2 Alternative options were therefore considered in the environmental report for their impact on population and human health and on air quality. The alternative options considered were:

- Continue with the current approach and continue to deliver the current policy outlined in LIP2
- Only promote sustainable forms of transport
- Only deliver infrastructure management
- Only increase capacity for sustainable forms of transport
- Do nothing

4.2.1 Only promoting sustainable forms of transport includes:

- Increase cycle training
- Increase school road safety training
- Increased motorcycle safety training
- Increase school travel awareness training
- Provide dockless cycle hire facilities

4.2.2 Only delivering infrastructure management includes:

- Extend and increase 20mph zones around schools
- More neighbourhoods of the future
- More liveable neighbourhoods
- Increased healthy streets
- Provide additional freight loading facilities
- Increase hours for freight loading
- Bus stop accessibility improvements
- Bus priority measures
- Extend borough cycle routes
- Increase cycle parking facilities
- Controlled parking zones
- Improved lighting
- Extend Shopmobility facilities
- Increased blue badge parking
- More dropped kerbs
- Legible London

4.2.3 Only increasing capacity for sustainable forms of transport includes:

- Extend borough cycle routes
- Increase cycle parking facilities
- Increase bus priority measures
- Increase provision of electric vehicle charging points
- Increased cycle facilities in developments
- Electric vehicle charging in developments
- Shared vehicle charging for developments

- 4.3 The cost of cars, fuel, air flights, healthy food, air flight paths, the cleanliness of water supplies, the local doctor and hospital facilities, how close we live to main roads, our working location and environment also greatly affect all of our health as well as our surrounding air quality and will most likely have a greater impact on all individuals than the programmes included in LIP3. However small changes particularly around schools and for children can make long term improvements.
- 4.4 It is a requirement of the SEA regulations to evaluate the cumulative effects of the plan and thereby to enable them to be avoided or at least minimised. Many of the proposals in LIP3 have a number of inter-related environmental effects.
- 4.5 All schemes which improve road safety such as 20mph extensions improve human health by reducing accident levels. At such locations, more people tend to walk and cycle more thereby also improving human health. As speeds slow down and drivers' journeys are smoother, less pollutants are emitted and noise and community severance is reduced. As people walk and cycle more, their health improves through a reduced risk of obesity and diabetes and improvements to their overall fitness levels.
- 4.6 Slower traffic speeds across the network improve human health as accident numbers reduce. However, where congestion is associated with the slower traffic, air pollution can increase as can community severance. Areas with low traffic volumes can also act as an inducement to increased traffic levels thereby increasing air pollution.
- 4.7 Increasing awareness of biodiversity, fauna and flora tends to increase how much people care about the issue. However large visitor numbers can also destroy such environments and therefore increasing visitor numbers needs to be managed carefully. In addition, when schemes are introduced, materials used need to be sensitive to the environment and can provide greater protection for some species.
- 4.8 All impacts of climate change are likely to be cumulative and permanent and are considerably impacted by traffic levels.
- 4.9 During all works implemented as a result of LIP3 the environment is considered during all stages. This is monitored through Harrow's Environmental Management System. Where necessary, materials will be changed and schemes revised to minimise the cumulative environmental impact.
- 4.10 From completing the SEA, it was determined that there are no significant adverse effects from the proposals outlined in LIP3.
- 4.11 The option selected for implementation in LIP3 was influenced by the analysis in the Environmental Report and the results of the consultation. However, the major influence on the final option selected was the obligation to implement the Mayor's Transport Strategy and the financial constraints which limit borough choices. The final option to be implemented will be a combination of all of the alternatives considered with the exception of the Do Nothing option.

5. Environmental benefits from LIP3

- 5.1 The findings of the Environmental Report are that no significant environmental impacts resulting from implementation of LIP3. The greatest environmental benefits resulting from implementing the initiatives in LIP3 will be on human health and air quality, however these

impacts although positive are also not significant. These issues are both more affected by issues beyond the control of the council.

5.2 The likely environmental benefits as a result of implementing LIP3 will be as follows:

- Increased trees planted as part of various schemes
- Location specific improvements to air quality
- Less car pollution as cars get cleaner and as a result of incentives to use greener vehicles particularly electric vehicles
- Reduced road casualties
- Better life expectancy as a result of less air pollution and more active travel
- Increase in cycling – particularly cycling to school
- Modal shift away from motorised vehicles towards walking and cycling improving local air quality
- Healthier lifestyles from increased walking and cycling
- Reduced congestion at specific locations – partly also as a result of economic issues
- Less traffic dominance improving air quality
- Reduced CO2 emissions from modal shift
- Improved condition of material assets where schemes take place
- Some areas regenerated
- In some areas reduced pollution will cause less damage to heritage buildings

6. Monitoring the environmental impact

6.1 To ensure that the council takes full consideration of unforeseen changes as a result of implementing LIP3, the council will monitor the impacts on human health and air quality.

6.2 Programmes that impact on human health include all those that encourage walking, cycling, reduce accidents, increase road safety and improve air quality either through modal shift or using greener vehicles. This is the vast majority of programmes included in LIP3.

6.3 Programmes that impact on air quality include all those that reduce congestion, encourage use of sustainable transport, modal shift and encourage change of vehicle type to greener vehicles. This is also the vast majority of programmes included in LIP3.

6.4 Table 5 shows possible measures for monitoring impacts on air quality and human health:

Table 5: Measures for monitoring environmental impact of LIP3

SEA Issue	LIP3 environmental impact	Existing possible measures for monitoring
Air Quality	<ol style="list-style-type: none"> 1. Less traffic 2. Less school run traffic 3. Modal shift towards cycling 4. Increased use of <i>greener</i> vehicles 5. Reduced vehicle idling 	<ol style="list-style-type: none"> 1. Not easily measurable 2. Results of school hands up survey for car use 3. Cycle counters introduced across the borough 4. Number of <i>greener</i> vehicle parking permits issued and use of new electric charging infrastructure 5. Anti-idling campaigns

Population and Human Health	<ol style="list-style-type: none"> 1. Less road accidents 2. Increased school travel plans 3. Participation in Harrow Health Walks 4. Reduced level of diabetes and depression 5. Less respiratory illness as a result of better air quality 	<ol style="list-style-type: none"> 1. Measured by police through STATS19 2. Number of accredited school travel plans 3. Numbers participating in Harrow Health Walks 4. Impact will be over a longer time period 5. Impact will be over a longer time period
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6.5 Based on the information in Table 5 and on the available resources for measuring the environmental impact of LIP3, it is recommended that the following monitoring takes place:

For air quality: Results of school hands up survey for car use and cycle count data
 For population and human health: Total KSIs on Harrow roads, number of accredited school travel plans

6.6 The environmental impact of introducing LIP3 will be significantly influenced by many other issues and these other issues are likely to be greater than the impact of LIP3. These wider issues include the following:

- Impact of Brexit
- Possible impact of no deal Brexit
- State of the economy and employment levels
- Changing attitudes to car ownership
- National investment in public infrastructure and in particular rail infrastructure

6.7 The environmental data will be reported as shown in Table 6.

Table 6: Reporting of environmental impact of LIP3

Measure	Unit	Data Source	Frequency of reporting
School hands up survey	% of children using sustainable transport to get to school	School travel plan officer	Annual
Cycle count data	Total average daily cyclists passing all Council cycle counters	Traffic engineering	Annual
Total KSIs	Number of people killed and seriously injured on Harrow roads	STATS19	Annual – to be reviewed annually but reported on a 3 yearly basis
School STARS accreditation	Number of silver, bronze and gold accredited travel plans	School travel plan officer	Annual

6.8 The monitoring information for the environmental impact will be publicly available on request only.

7. Conclusion

- 7.1 The evidence base generated from the previous SEAs prepared for previous Harrow LIPs greatly helped the production of this SEA and statement for LIP3. It is likely that future SEAs in transport will also benefit from this.

Appendix A

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
Air quality related		
Suggest rewrite to: Improve freight servicing and delivery arrangements to reduce congestion and delays on the network, including encouraging consolidation centres and last-mile cargo-cycle or walking delivery of small orders, by limiting motor vehicle access to minor streets and pedestrianised areas.	Improve freight servicing and delivery arrangements to reduce congestion and delays on the network.	Improve freight servicing and delivery arrangements to reduce congestion and delays on the network and consider other types of freight delivery options that could reduce traffic congestion.
Population and human health related		
Policies should enable and encourage walking and cycling amongst disabled people, by providing wide, uncluttered footways, places to stop and sit, convenient and safe pedestrian crossings, parking for tricycles and other non-standard bikes, and a good quality cycling network.	Encourage the uptake of more sustainable modes of travel through active travel initiatives, delivering additional healthy routes to school, promotion of cycle hire schemes, the use of parking and permit policies and prioritising road space to walking and cycling to improve the environment.	Encourage the uptake of more sustainable modes of travel including travel for those with mobility difficulties and dissuade use of private cars through active travel initiatives, delivering additional healthy routes to school, promotion of cycle hire schemes, the use of parking and permit policies and prioritising road space to walking and cycling to improve the environment.

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
<p>Borough should introduce street play time - after school where children can go out and play with friends without the risk of any cars driving by - this will prevent them sitting in front of the TV as an alternative.</p>	<p>As 'Liveable Neighbourhoods' and healthy streets are introduced, increased planting and street greening will be introduced and issues of severance caused by high traffic flow will be addressed.</p>	<p>As 'Liveable Neighbourhoods' and healthy streets are introduced, increased planting and street greening will be introduced, issues of severance caused by high traffic flow will be addressed, potential reallocation of road space to benefit sustainable transport, as well as road traffic restrictions and the possible introduction of play streets.</p>
<p>Encourage BAME members to cycle more</p>	<p>Not previously included</p>	<p>Introduce measures and programmes to encourage persons from BAME and other statistically cycling adverse groups to take up cycling and to cycle more often</p>
<p>Suggest rewriting as "Prioritise in all new schemes the needs of those with mobility difficulties who need to walk, cycle or drive to work, shops or other facilities</p>	<p>Prioritise in all new schemes the needs of those with mobility difficulties who need to drive to work, shops or other facilities</p>	<p>Prioritise in all new schemes the needs of those with mobility difficulties who need to walk, cycle or drive to work, shops or other facilities and local amenities</p>
<p>Educate motorised road users on the shared responsibility for safer cycle and motorcycle journeys, through driver and motorcyclist skills training and communications.</p>	<p>Educate road users on the shared responsibility for safer motorcycle journeys, through driver and motorcyclist skills training and communications</p>	<p>Educate road users on the shared responsibility for safer cycle and motorcycle journeys, through driver and motorcyclist/cyclist skills training and communications</p>

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
<p>Would like to see improving road safety for horse riders</p>	<p>Ensure that the safety concerns of all road users are considered in traffic schemes</p>	<p>Ensure that the safety concerns of all road users, including pedestrians, cyclists, horse riders and those in motorised vehicles are considered when developing any traffic scheme</p>
<p>Encourage the uptake of cargo bikes and electric bikes to replace van journeys.</p> <p>Add a policy of supporting businesses in switching from vans to cargo bikes.</p>	<p>Encourage modal shift towards more sustainable forms of transport</p>	<p>Encourage modal shift towards more sustainable forms of transport and in developing travel plans work with businesses to give consideration to support switching deliveries from vans to sustainable travel modes including cargo bikes</p>
<p>No mention of noise pollution, especially motorbikes and cars that are modified to make noise.</p>	<p>Not previously included</p>	<p>Work with schools and police with regard to issues of traffic noise pollution, particularly from motorcycles</p>
<p>Review cycle parking at all stations across the borough and ensure that provision meets likely demand</p>	<p>Review cycle parking at stations, particularly at Wealdstone, Harrow on the Hill, Stanmore and Rayners Lane stations</p>	<p>Review cycle parking at stations, particularly at Wealdstone, Harrow on the Hill, Stanmore and Rayners Lane stations and work towards cycling provision meeting likely demand at these stations and further afield</p>

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
<p>The amount of anti-social behaviour displayed by teenagers on buses and in particular, recently, in the vicinity of Harrow Bus Station, is frightening people from using public transport and involving a lot of police resources, which could be better utilised elsewhere.</p>	<p>Not previously included</p>	<p>Support the police to address anti-social behaviour around Harrow bus station</p>
<p>Material Assets related</p>		
<p>All Bus stop clearways to be properly marked with cage painted on road</p>	<p>Not previously included</p>	<p>Ensure that road markings to better enable bus priority enforcement are prioritised in all schemes</p>
<p>Ensure growth and development conserve and enhance the borough's heritage assets</p>	<p>Ensure that all schemes implemented follow the Harrow public realm design guides ensuring best practice for materials and reducing street clutter</p>	<p>Ensure that all schemes implemented follow the Harrow public realm design guides ensuring best practice for materials, reducing street clutter and conserving the local environment</p>
<p>Cultural heritage related</p>		

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
<p>The wider context within which the historic environment is experienced is an important aspect of its settings and therefore its significance. Settings go beyond visual links to include atmospheric factors such as</p> <p>The increase in environmental aggressors deriving from emissions that could accelerate the erosion and decline of the historic fabric are an issue.</p>	Not previously included	<p>The development of enhanced public realm throughout the borough also needs to consider the impact of noise, dust, vibrations, pollution and vehicle emissions in the locality as these can detract from the enjoyment of any environment. Damage can occur through vehicle emissions which can accelerate the erosion and decline of an area’s historic fabric. The siting of signage, road markings, pavement works and crossings can all impact on the visual aesthetic of an area and their locations must be sensitively considered.</p>
<p>Measuring success which improve, enhance or better reveal the significance of heritage assets and their setting.</p> <p>Consideration should be given to the impact of proposals upon the setting of both the designated and non-designated assets together with the potential for unknown archaeology.</p>	Not previously included	<p>Ensure that all new public realm improvements and neighbourhood schemes consider their impact on heritage assets and their setting alongside the local archaeological potential as well as designated and non-designated assets</p>
Landscape	No comments received	
Biodiversity, Fauna and Flora	No comments received	
Soil	No comments received	

Consultation Comment	Pre-consultation LIP3 content	Revised LIP3 content (changed wording shown in bold)
Water	No comments received	
Climatic Factors	No comments received	