

Harrow Local Plan 2021–2041: Main Modifications Consultation Representation Form

**Please return your representation to the Planning Policy Team by:
12:01pm on Tuesday 23 December 2025**

About this consultation

The London Borough of Harrow is consulting on the proposed Main Modifications to the Harrow Local Plan 2021–2041. These are changes the independent Planning Inspector examining the draft plan has identified as being necessary to make the Plan sound and legally compliant. This consultation is not a repeat of earlier consultations, and it is not an opportunity to comment on parts of the Plan that are not proposed to be modified.

Comments are therefore only invited on:

- the published Schedule of Main Modifications,
- any related changes to the updated Policies Map / Atlas of Change, which are limited to those needed to give effect to the Main Modifications, and
- the updated Integrated Impact Assessment (including Sustainability Appraisal and Habitats Regulations Assessment) and Non-Technical Summary.

All representations made on these documents will be sent to the Inspector for consideration.

What to consider when making a representation

When you comment at this stage, please focus on whether the specific modification you are commenting on would make the Plan:

1. Legally compliant

Has the modification and any related material been prepared and consulted on in line with the legal requirements?

2. Sound

If you think the modification would leave the Plan unsound tell us which test it fails:

- (a) positively prepared,
- (b) justified,
- (c) effective,
- (d) consistent with national policy.

3. What appropriate change is needed

If you think the wording should be different set out the precise change you want the Inspector to recommend.

Please do not use this form to raise new site proposals or to revisit objections to parts of the submitted Plan that are not proposed for modification.

Alongside the Main Modifications the Council is also publishing a schedule of Additional Modifications. These are changes that taken together the Council considers do not materially affect the Plan and which it can therefore make when the Plan is adopted. These Additional Modifications are not required to make the Plan sound, and they do not form part of the formal examination. Should you wish to make any comments on the Additional Modifications, these will be considered by the Council rather than the Inspector.

Full details of the Examination of the Harrow Local Plan and this consultation can be found at: <https://www.harrow.gov.uk/localplanexamination>.

**London Borough of Harrow New Local Plan
Consultation on Main Modifications
Representation Form**

Ref:

(For official use only)

Please return to London Borough of Harrow, New Local Plan, Planning Policy Team, Forward Drive, Harrow, HA3 8FL / local.plan@harrow.gov.uk by 12:01pm on Tuesday 23 December 2025.

For further information regarding how we store and process your data, please visit the New Local Plan webpages at www.harrow.gov.uk/newlocalplan. Please also see the Harrow Council Privacy Notice: <https://www.harrow.gov.uk/privacy>. We process data in line with GDPR and UK privacy laws. For more information, contact our Data Protection Officer at: DPO@harrow.gov.uk

This form has three parts:

Part A – Personal Details (Please complete once)

Part B – Your Representation/s (Please complete a separate sheet for each representation you are making)

Part C – Demographic Details (Please complete once)

Please go to the next page.

Part A

1. Personal Details***2. Agent's Details (if applicable)**

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
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First Name	John	
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Last Name	Cutler	
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Job Title	Design & Planning Manager	
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(where relevant)

Organisation	L&Q	
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(where relevant)

Address Line 1	29-35 West Ham Lane	
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Line 2	Stratford	
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Line 3	London	
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Line 4		
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Post Code	E15 4PH	
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Telephone Number		
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E-mail Address		
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Part B: Section 1: Your Representation

Please complete a separate Section B for every modification you wish to comment on.

Which document are you commenting on?

- Schedule of Main Modifications
- Policies Map / Atlas of Change
- Updated Integrated Impact Assessment (including SA and HRA)
- Schedule of Additional Modifications (for consideration by the Council only)

Modification / reference you are commenting on? (e.g. MM01, Map change LE10)

Ref: MM77

Does this modification make the Plan legally compliant?

- Yes
- No
- Don't know

Does this modification make the Plan sound?

- Yes
- No

If you think it is not sound tell us which test(s) it fails?

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Your comments

Please set out clearly why the MM, map change or updated IIA is or is not legally compliant and/or sound. Say if your view is based on the wording, evidence, or how it will work in practice. Continue on a separate sheet if needed.

These representations are prepared in the context that L&Q broadly supports the draft new Harrow Local Plan, subject to previous comments provided in representations and our Hearing Statement.

Our comments are provided in respect of MM77 regarding the draft revised allocation for the former Kodak factory site (OA16).

Whilst we support the change from the housing numbers being a 'minimum' to an 'indicative', to reflect a justified and effective policy, L&Q feel there is some confusion over how the number of dwellings is presented. Whilst it is helpful that the number of homes (minimum 2,388) is clarified as being from April 2024, the reference to 452 homes being delivered before the plan period is confusing:

- Firstly, the former Kodak site is a large multi-phase development within numerous ownerships, which first gained outline planning permission in 2015, and where far more than 452 homes have been delivered prior to the plan period.
- Secondly, no homes are shown as being delivered for the site allocation OA16 in the 'pre-adoption' dates in the table at Page 123 (MM61), which is inconsistent with the alleged 452 figure.

These inaccuracies and inconsistencies need to be addressed for the plan to be justified and effective.

(Continue on a separate sheet if needed)

PART B CONTINUED ON NEXT PAGE

Part B Continued.....

What change do you want the Inspector to recommend?

(Please be as precise as possible. If you are asking for wording please supply it.)

Confirm the correct number of homes delivered on the OA16 former Kodak site pre-plan period at the table on Page 123 (MM61).

(Continue on separate sheet if needed)

Part B: Section 2: Participation at any further hearings

The Inspector will only hold further hearings if needed for the Main Modifications. **Do you wish to participate at a further hearing session if one is held on this issue?**

Yes No

If yes, please briefly say why appearance is needed (The Inspector will decide who appears.)

Part B: Section 3: Data protection

Representations will be published with your name. Contact details will be held by the Council in line with its privacy notice and will be provided to the Programme Officer and the Planning Inspectorate so they can contact you about the examination.

- I understand my representation will be made public.**
- I wish to be informed of the progress of the examination, including publication of the Inspector's report and adoption of the plan.**

Privacy notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the consultation database. If added to the database, you can be removed upon request.

This data is collected, collated, and then used only in relation to the independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation. Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Local Plan.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential. Further details harrow.gov.uk/newlocalplan.

Part B: Section 1: Your Representation

Please complete a separate Section B for every modification you wish to comment on.

Which document are you commenting on?

- Schedule of Main Modifications
- Policies Map / Atlas of Change
- Updated Integrated Impact Assessment (including SA and HRA)
- Schedule of Additional Modifications (for consideration by the Council only)

Modification / reference you are commenting on? (e.g. MM01, Map change LE10)

Ref: MM19 (Policy SP03(5)B), MM20 (Policy HO1.A(1))

Does this modification make the Plan legally compliant?

- Yes
- No
- Don't know

Does this modification make the Plan sound?

- Yes
- No

If you think it is not sound tell us which test(s) it fails?

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Your comments

Please set out clearly why the MM, map change or updated IIA is or is not legally compliant and/or sound. Say if your view is based on the wording, evidence, or how it will work in practice. Continue on a separate sheet if needed.

These representations are prepared in the context that L&Q broadly supports the draft new Harrow Local Plan, subject to previous comments provided in representations and our Hearing Statement.

The proposed modification to MM19 (draft Policy SP03(5)B) states that the strategic target is for 35% of all new dwellings delivered to be family sized dwellings (3 bed +) across the Borough over the plan period, up from 25% in the submission version of the draft Local Plan.

Whilst Policy SP03(5)B can reasonably be read as a strategic target (with variations for individual schemes), amended draft Policy HO1(A).1 states that a minimum of 35% of

all units within a scheme should be family sized dwellings, again, up from 25% in the submission version of the draft Local Plan.

L&Q understands and supports the need for family sized accommodation, and recognises that the need may be greater than 25% in the borough. However, there must be a recognition that provision of greater levels of family housing can significantly affect scheme viability (and therefore overall housing delivery), primarily through reduced efficiencies and increased construction costs and market forces. Therefore, increasing the family housing can clearly impact on the delivery of the Local Plan.

The Reason for Modification for MM20 refers to the amended requirement reflecting the evidence base. The Council's evidence base includes a Viability Assessment undertaken by BNP Paribas Real Estate (October 2024) which is based on the assumption that 25% of new homes are provided as family housing. However, the 35% requirement appears to not have been viability tested through the evidence base, which runs contrary to national planning practice guidance ('PPG'):

- PPG makes clear that the role for viability assessment is primarily at the plan making stage, and that viability assessments should be used to ensure that policies are **realistic**, and that the total cumulative cost of **all relevant policies** (for instance, including those relating to unit mix) **will not undermine deliverability of the plan**. It goes on to state that it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to **create realistic, deliverable policies**. It goes on to state that policy requirements should be set at a level that **allows for the planned types of sites and development to be deliverable**, without the need for further viability assessment at the decision making stage (Paragraph: 002 Reference ID: 10-002-20251216). [our emphasis]
- PPG also makes clear that plan making authorities should **prepare a viability assessment** in accordance with guidance to **ensure that policies are realistic** and the total cost of all relevant policies is not of a scale that will make the plan **undeliverable** (Paragraph: 039 Reference ID: 61-039-20190315). [our emphasis]

In light of the above, it is clear that national planning practice guidance requires a viability assessment of all policies, including those relating to unit mix. Whilst a viability assessment was carried out based on the previous 25% requirement, no assessment of the 35% requirement appears to have been undertaken, contrary to national policy and guidance. As such, there is no certainty that this updated requirement would be deliverable, and would likely result in more planning applications going through the viability tested route.

In light of the above it is considered that in the absence of a viability assessment, the minimum 35% family home requirement as set out at draft Policy HO1(A).1 is not sound as it is not justified, or proven to be effective, in accordance with national planning guidance.

(Continue on a separate sheet if needed)

PART B CONTINUED ON NEXT PAGE

Part B Continued.....

What change do you want the Inspector to recommend?

(Please be as precise as possible. If you are asking for wording please supply it.)

The relevant proposed changes at MM19 (draft Policy SP03(5)B) and MM20 (draft Policy HO1.A(1)) should be discounted, with the family housing requirement reverting back to 25%, unless viability evidence is provided to demonstrate that such policies would not result in significant impacts on delivery of development in the borough.

(Continue on separate sheet if needed)

Part B: Section 2: Participation at any further hearings

The Inspector will only hold further hearings if needed for the Main Modifications. **Do you wish to participate at a further hearing session if one is held on this issue?**

Yes No

If yes, please briefly say why appearance is needed (The Inspector will decide who appears.)

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