

## 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](mailto: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](http://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](mailto: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 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\_\_\_\_\_

**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.

Please see the enclosed representations on MM19.

*(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.)

Please see the enclosed representations on MM19.

*(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](http://harrow.gov.uk/newlocalplan).

**Please return this form to London Borough of Harrow by 12:01pm on**  
**Tuesday 23 December 2025.**

**Thank you for your participation.**

# Harrow Local Plan 2021-2041: Main Modifications Consultation

## MM19 - Strategic Policy 03: Meeting Harrow's Housing Needs

### Representations on behalf of Taylor Wimpey Strategic Land (December 2025)

#### Introduction

1. On behalf of Taylor Wimpey Strategic Land ("Taylor Wimpey"), please find enclosed representations in response to the emerging Harrow Local Plan ("the Plan") Main Modifications consultation in relation to Main Modification MM19.
2. Taylor Wimpey has an interest in all strategic and non-strategic matters informing the preparation of the Plan. These representations are made specifically in the context of Taylor Wimpey's interests in land at Pinnerwood Farm, which it has promoted through the Call for Sites process. Taylor Wimpey has also submitted representations to the relevant stages of the plan-making process and participated at the Examination Hearing sessions during June and July 2025.
3. These representations respond to Main Modification MM19 relating to Strategic Policy 03, supplementing the detailed evidence and reasoning set out in our Regulation 19 submissions.
4. They focus on the key issues that remain unresolved and explain why MM19 fails to remedy the fundamental shortcomings of Strategic Policy 03. As drafted and modified, the policy is not sound in accordance with the requirements of paragraph 35 of the December 2023 National Planning Policy Framework ("the Framework")<sup>1</sup>.

#### Housing Delivery

5. Criterion 1 of the modified Strategic Policy 03 continues to set a housing requirement of 16,040 dwellings over the Plan period (2021/22 – 2040/41), which is derived from the London Plan housing target of 802 dwellings per annum ("dpa") and also indicates that the Plan seeks to adopt this requirement/target for the full 20-year Plan period (i.e. up to 2041).
6. It is critical to recognise that the London Plan does not identify housing needs for each London Borough. It identifies housing targets that are based on land availability as opposed to needs; this is set out clearly at paragraph 4.1.7 of the London Plan, with the relevant extract quoted at paragraph 13 of our Regulation 19 representations to Strategic Policy 03.
7. Notwithstanding this, the London Borough of Harrow ("LBH") is seeking to rely on the London Plan housing target for the Plan. Whilst Taylor Wimpey maintains the position that the Plan does not set out to meet the actual housing needs of the Borough, it does acknowledge that paragraph 17b) of the Framework does facilitate strategic policies being set by spatial development strategies produced by an elected mayor where plan-making powers have been conferred.
8. For the LBH, the London Plan represents the spatial development strategy, and this sets out strategic policies that are relevant to each London Borough.

---

<sup>1</sup> Under which the Plan is to be examined in accordance with paragraph 234b) of the December 2024 version of the Framework

9. It is critical to note that paragraph 33 of the Framework, which identifies that policies should be reviewed at least once every five years and updated if necessary<sup>2</sup>, applies to spatial development strategies. The London Plan was adopted in March 2021, and it will reach five-years of age in March 2026.
10. Considering this, the Greater London Authority (“GLA”) undertook a consultation on the ‘Next London Plan’ during May and June 2025. Paragraph 1.3 of the Next London Plan identifies a housing need in London of 87,992 new homes per year, which dwarfs the adopted London Plan annual housing target of 52,287.
11. This clearly demonstrates that the GLA has reviewed the London Plan and considered that it does need updating with respect to its housing policies. As such, it acknowledges that, as of March 2026, its strategic policies, including the housing targets set under Policy H1, will be out-of-date. This has material implications with respect to a range of planning matters, including the establishment of a requirement for the purposes of calculating the housing land supply position for each of the London Boroughs, and this is highly likely to be the position prior to the adoption of the LBH Plan.
12. Criterion 1 of Strategic Policy 03 of the Plan refers to the housing target set by the London Plan with respect to its intended housing supply. This in itself does not render the Plan unsound, but any reference to this representing the ‘future needs’ of the Borough is factually incorrect and misleading, as identified within our Regulation 19 representations and examination submissions.
13. Paragraph 4.0.1 of the supporting text to Strategic Policy 03 sets out that the Plan proposes to adopt a housing requirement / target of 16,040 homes between 2021-41 in compliance with the London Plan. However, the LBH cannot rely on a strategic policy from a spatial development strategy to justify a reduced housing supply figure as opposed to meeting its minimum Local Housing Need (“LHN”) (as would otherwise be required under paragraph 61 of the Framework) and then also ‘adopt’ this as its own housing requirement without scrutiny of whether this is sufficient to meet identified needs. Such an approach is inconsistent with paragraph 16f) of the Framework with respect to duplicating policy requirements and paragraph 61, to meet the minimum LHN of an area.
14. The potential implications of the proposed approach of the Plan are severe with respect to housing delivery and housing affordability within the LBH. Should the existing policy wording be retained, this significantly suppressed housing requirement would be allowed to be rolled forward for a further five years for the purposes of assessing the LBH’s housing land supply<sup>3</sup>, despite this figure likely being out-of-date before the Plan is even adopted. This would set a planning policy framework that would suppress housing delivery to an out-of-date target and where the minimum LHN (i.e. the actual housing need) is 286% greater.
15. From March 2026, every other Borough in London will be planning positively with respect to housing delivery to meet the Government’s aims of delivering 300,000 homes per year. Based on the wording of Strategic Policy 03, the LBH would be able to resist development proposals that would be acceptable in other London Boroughs, such as on grey belt land. Such an approach would result in a significant further worsening of housing affordability within the LBH<sup>4</sup>.
16. Further adverse impacts, such as unsustainable commuting patterns, are set out within our Regulation 19 representations.
17. As a consequence, the current wording of Strategic Policy 03 is fundamentally unsound and would set a concerning and unjustified planning policy framework for the LBH that is inconsistent with the Framework, the Government’s aspirations to tackle the housing crisis facing England, the Mayor of London’s aspirations to boost housing delivery across London, and the delivery of sustainable development within the LBH.
18. Proposed further essential modifications to Strategic Policy 03 to avoid such issues are set out at the end of these representations.

---

<sup>2</sup> This requirement is also set by Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>3</sup> PPG Paragraph: 005 Reference ID: 68-005-20190722 and Paragraph: 006 Reference ID: 68-006-20190722

<sup>4</sup> PPG paragraph: 006 Reference ID: 2a-006-20241212

## Windfall Delivery

19. A notable amendment introduced by MM19 is the significant reduction of dwellings to be delivered via commitments and existing allocations and the consequential significant increasing of the required supply from windfall development to offset this and ensure that the Plan provides a housing supply to meet the London Plan housing target. This is a modification to criterion 3 of Strategic Policy 03.
20. No assessment of this appears to have been undertaken as part of the Integrated Impact Assessment relating to the Main Modifications (examination document ref. LBH\_ED31).
21. It is imperative that the LBH justifies its proposed reliance on windfall development based on the requirements of the Framework. Notably, reliance on windfall requires "*compelling evidence*" that this would provide a reliable source of supply<sup>5</sup>. This is required to have regard to each of the following factors:
  - i. The Strategic Housing Land Availability Assessment;
  - ii. Historic Windfall Rates; and
  - iii. Expected future trends.
22. Paragraphs 4.3.8 – 4.3.10 of the Plan, that support the revised Policy H1, refer principally to historic delivery rates, which are only one of (and, potentially, the least relevant) of the considerations outlined within the Framework.
23. In this context, it is important to note that the Plan is requiring the delivery of very high-density developments on allocated brownfield sites to meet the housing target set by the London Plan, and the Plan is only just able to meet this target. This strongly indicates that there is limited land available within the existing urban area to be delivered as windfall development to meet the figure within the submission version of the Plan, let alone the significantly increased windfall requirement proposed via MM19.
24. With the Plan resisting the release of land from the Green Belt<sup>6</sup>, as discussed in detail within our Regulation 19 representations and during the Hearing sessions, there is a significant restriction on the ability for new homes to come forward under the provisions of the Plan to meet the windfall figure.
25. With respect to the 'Small Sites Capacity Study (2022)', it is notable that paragraphs 3.1 and 3.2 indicate that not all sites that have informed the capacity have been made available by the respective landowners, with it likely that some of these sites are occupied by another use (with limited information available regarding the small sites subject to the capacity study). Accordingly, this does not provide 'compelling' evidence with respect to future sources of windfall supply.
26. Further, the comments in relation to an amendment to supporting paragraph 5.0.28 under MM32 suggests that the increased windfall requirement is in response an ability for windfall delivery to come forward within the Harrow & Wealdstone Opportunity Area; however, it is not clear whether the significant increase to the windfall requirement reflects the opportunities for windfall development within the Opportunity Area with no evidence provided to justify this.
27. On this basis, the LBH has not provided the required 'compelling' evidence to justify the windfall figure set out within Strategic Policy 03.

## Mix of Housing by Size

28. Criterion 5B of Strategic Policy 03 identifies a strategic target with respect to family sized homes. The amendments outlined under MM19 propose to increase this target from 25% to 35%.

---

<sup>5</sup> Paragraph 72

<sup>6</sup> As set out at paragraph 7.0.3 of the Plan

29. However, this remains entirely inconsistent with the identified need set out at Figure 5 of the LBH February 2024 Updated Local Housing Needs Assessment (examination document ref. EBH02), which requires 80% of the new homes delivered to meet the London Plan housing target to comprise 3 and 4 bedroom dwellings. This equates to 12,552 homes, which is the more appropriate metric to assess the effectiveness of the Plan.
30. Paragraph 63 of the Framework sets a clear requirement that planning policies reflect the identified need for housing to be reflected within planning policies. Strategic Policy 03 of the Plan does not conform to this, and the Plan does not set a framework that would facilitate the delivery of the 12,552 family homes that are identified to be needed.
31. The LBH failed to address this matter during the Examination Hearing sessions, and it is clear that the Plan fails fundamentally with respect to the delivery of family homes, even based on a significantly suppressed housing supply target (that relies on the soon-to-be out-of-date existing strategic policy of the London Plan – see the previous section of these representations).
32. This clearly points to a predetermined spatial strategy informing the housing needs of the Plan, as opposed to the housing needs informing the preparation of a sustainable spatial strategy. This is inconsistent with paragraph 31 of the Framework and highlights that the Plan is not justified, as required to be concluded sound in accordance with paragraph 35b of the Framework. The Plan also fails the test of being effective with respect to the delivery of family homes (paragraph 35c).
33. The scope of MM19 is not sufficient to comprehensively address this issue, but as a starting point to ensure alignment with its own evidence base, Criterion 5B of Strategic Policy 03 should be amended to reflect the actual need for family homes within the LBH.
34. This matter is discussed further in our representations to Main Modification MM20.

## Required Modifications

35. To ensure that Strategic Policy 03 can meet the test of soundness, subject to further amendments to the Plan, we propose that the following further modifications in relation to the matters raised within these representations are essential (modifications in red and green font):
  - i. Criterion 1:

*The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22 – 2040/41), to meet the London Plan housing target for the 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 the Borough housing capacity from all sources, the 10-year housing delivery target will be met.*
  - ii. Criterion 5B:

*Mix of Housing by size: To meet the identified need for family homes, as identified by the February 2024 Updated Local Housing Needs Assessment, a-A strategic target has been set to ensure a minimum 8035% (12,5524,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.*
  - iii. Supporting text paragraph 4.0.1:

*The Draft Local Plan proposes to provide a supply of new homes to meet the London Plan housing target adopt a housing requirement/target of 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan. The*

*~~proposed target~~ This includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for students and older people*

36. Moreover, the LBH needs to provide compelling evidence to justify the significantly increased windfall delivery requirement.