

## 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)**

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**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.**

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*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)*

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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)**

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**Please go to the next page.**

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## Part B: Section 1: Your Representation

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**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\_\_MM20\_\_\_\_\_

**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 MM20.

*(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 MM20.

*(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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## **Part B: Section 3: Data protection**

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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

## MM20 - Policy HO1: Dwelling Size Mix

### 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 MM20.
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 MM20 relating to Policy HO1, 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 MM20 fails to remedy the fundamental shortcomings of Policy HO1. 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>.

#### General Housing Development

5. MM20 proposes to increase in the borough-wide family housing requirement from 25% to 35% (Part A1i). However, this remains wholly inadequate when set against the Council’s own evidence.
6. The Council’s own Local Housing Needs Assessment (“LHNA”)<sup>2</sup> (February 2024) demonstrates a substantially higher evidenced requirement for family housing – 54.5% for 3-bed dwellings and 23.7% 4<sup>+</sup> bed dwellings based on a total provision of 16,040 homes, over the period up to 2041. Notwithstanding the points raised in our representations to MM19 with respect to the overall housing figures, this equates to an actual combined need of 12,552 family homes.
7. The Hearing Statement of London Borough of Harrow (“LBH”) with respect to Matter 5 of the Hearing sessions that took place in the summer of 2025 acknowledges this need stating:

*“The Local Housing Needs Assessment (EBH02) indicates there is a significant need to increase the provision of family sized housing, to address the needs of existing and future households, reduce overcrowding and provide more housing options for younger families that are more suitable for addressing their needs. For example, figure 54 indicates that circa 80% of all new housing should be family sized housing. The significant level of need for family sized housing is also supported by the Council’s housing register that suggests significant unmet needs,*

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

<sup>2</sup> Figure 4 and 5 of the Local Housing Needs Assessment February 2024

*census data and the increase in the homeless families that are being housed in unsuitable temporary accommodation”.*

(Emphasis added)

8. Despite the significant level of need identified for family housing by the evidence, and the LBH's identification that many families are being housed in unsuitable accommodation, MM20 only proposes a minimum of 35% of family sized homes, which is significantly below the family housing need identified by the LBH's own evidence.
9. Furthermore, as set out at paragraph 10 and 11 in our Regulation 19 representations in response to Policy HO1, it was recognised more than five years ago (including by the Secretary of State) that the suppressed London Plan housing targets do not facilitate delivery of the size, type and tenure of housing required in London, particularly family housing.
10. The Hearing Statement of LBH for Matter 5 seeks to justify not conforming to the needs set out within the LBH's evidence by stating:

*“This approach seeks to ensure an appropriate balance is achieved between the need to increase the provision of family housing and a competing set of factors, such as increasing the delivery of units to address overall housing needs by optimising the output of sites; the need to consider the site size, constraints, location, an area's character and viability (in line with H10 of the London Plan)”.*

11. This statement clearly indicates that the LBH has predetermined a spatial strategy and has then reviewed what can be delivered within this. Such an approach is in complete contrast with paragraph 31 of the Framework, which states that the preparation of policies should be informed and guided by relevant and up-to-date evidence, and paragraph 35b), which requires the strategy to be based on proportionate evidence.
12. The reference in supporting text paragraph 4.1.4 to a 2017 London Plan evidence base document is concerning as this is not up-to-date evidence, with this having been superseded by LBH specific evidence set out by its own LHNA.
13. A spatial strategy focused entirely on the delivery of high-density development on brownfield land is clearly not conducive to the delivery of family homes. In forming this spatial strategy – as demonstrated by our Regulation 19 representations – the LBH chose to disregard available, suitable and achievable greenfield sites within the Borough that were promoted through the Plan-process – including Land at Pinnerwood Farm – that would be able to deliver a substantial amount of new housing as family homes.
14. The Framework sets out in paragraphs 8a and 60 the requirement to ensure that sufficient land for the right types of housing is provided, as opposed to simply meeting the minimum housing requirement, and paragraph 63 states that the type of housing need should be reflected in planning policies. It is evidence that these requirements have been ignored in the preparation of spatial strategy that underpins the Plan. Such an approach means that it cannot be concluded that the Plan is justified, and it is consequently fundamentally unsound.
15. Moreover, the proposed modification at Part A1i does not adequately reflect family housing need identified in the Council's LHNA, nor do they provide the policy tools to deliver them therefore fails to comply with the paragraph 63 of the Framework Plan and cannot be found sound.
16. Notwithstanding the above, there is no updated viability testing, no site-level assessment demonstrating how each allocation will contribute to family housing, and no implementation/monitoring framework with clear triggers for remedial action or early review.
17. The deleted Part A3 provision that *“Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrate it would be unsuitable due to site/design considerations or be financially unviable”* was a crucial delivery mechanism within the policy.

18. Notwithstanding the point that we make that the modification to policy HO1 does not adequately address family housing need, the removal of Part A3 means there is no clear policy mechanism to ensure developers actually provide the family homes that the Plan's supporting evidence demonstrates is required. The modification therefore renders the policy ineffective — it sets a target but provides no enforceable means to achieve it, monitor compliance or refuse schemes that would undermine the objective.
19. The deleted wording at Part A1i, "*higher proportion will be required on suitable sites*" recognised that some sites (e.g. greenfield/grey belt sites where appropriate) are demonstrably more suitable for delivering family housing.
20. The proposed removal of the above phrase at Part A1i eliminates any expectation that the Council will direct family housing to those sites where it is most deliverable. That will make achieving the borough-wide target far less likely, especially given the Plan's heavy reliance on small-site and flatted brownfield delivery (which historically yields few family homes).
21. In addition, the proposed modification under MM20 includes the removal of Part D7 which stated:

*"The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned. Through the Annual Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for next generation. The AMR will assist in informing the Council's consideration of dwelling mix on site by site basis."*
22. The removal of the proposed commitment for a periodic review further undermines the policy's effectiveness.

## Required Modifications

23. Given that the housing mix requirements of Policy HO1 are informed by the LBH's aim to fit these into the predetermined spatial strategy, the scope of MM20 is not alone sufficient to address this fundamental soundness failure and deliver the evidenced 12,552 family homes.
24. However, to start to unpick the fundamental soundness issues regarding housing mix, we propose that the following further modifications top Policy HO1 in relation to the matters raised within these representations are essential (modifications in red and green font):
  - i. Criterion A1i):

*A Borough-wide family housing target of 80% of new dwellings shall be delivered as ~~A minimum of 35% of all units within a scheme are should be~~ family sized dwellings (three bedrooms or more). ~~The remaining dwelling size mix will be determined having regard to the following: and~~ This will require a higher proportion ~~will be required on suitable~~ to be delivered on some sites;*
  - ii. Criterion A3 – reinstate deleted text
25. Further modifications may be required to the supporting text to align with the above.