

**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 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_Map changes OSO1-OSO11 and Polices Map_____

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 Representation on enclosed sheet

(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 Representation on enclosed sheet

(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.)

The previous Examination Hearings showed that many aspects of the Reg 19 Document were weak and the LPA's approach needed justification and debate. The same is true of the Major Modifications and appearance at the Examination is necessary to ensure that the LPA's changes are robust. Absence of debate will allow weak policies to survive when they should not.

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.

Atlas of Change and Changes to the Policy Map OSO1-OSO11

1 Introduction

The Hive Football Centre is currently subject to an allocation as open space under the adopted Development Plan. The emerging local plan also proposes to designate the site as open space. The site may have operated as open space in the past this is no longer the case as the site is dominated by the Hive Football Centre.

Para 3.8 of the Examination in Public Note to Inspector – Open Space Evidence 3 July 2025 states that the

“...current policy framework sets a presumption against the loss of open space.”

This means that for as long as The Hive remains designated as Open Space on the Policy Map, open space policy G12 will be applied to it before policy CL13 relating to Sport and Recreation. Policy G12 A b will prevent any form of indoor sports provision from coming forward if it results in the net loss of open space, even though such provision would be encouraged by Policy CI 13. No expansion of the built facilities over those already existing will be possible in the future if this designation remains, as this cannot be achieved without a net loss of open space, as things presently stand.

2 The Hive Football Centre

The purpose and function of The Hive is to be a centre of excellence for the coaching, training and playing of football. It is the home to Barnet FC, a professional football club that competes in the Football League, and The London Bees, a semi-professional women's team playing in the Women's National League.

The site also regularly hosts international teams preparing to play matches and tournaments in England as well as a full programme of activities for community and schools, playing, training and competing in tournaments. The Hive is acknowledged as providing the best quality professional sports facilities in the Borough.

The site has changed in character quite considerably over the past 15 years or so. It has changed from a small stadium surrounded by playing fields to a sporting campus. In particular the amount of development that has occurred on the southern end of the site is substantial and this part of the site no longer meets any reasonable definition of public open space. It has evolved into an important sports venue.

For the purpose of management, the Hive Football Centre is divided into areas identified as Areas A to D respectively. These reflect the order in which work has historically been undertaken on site but have been retained for consistency and clarity. These Areas are shown on the plan below and are as follows:

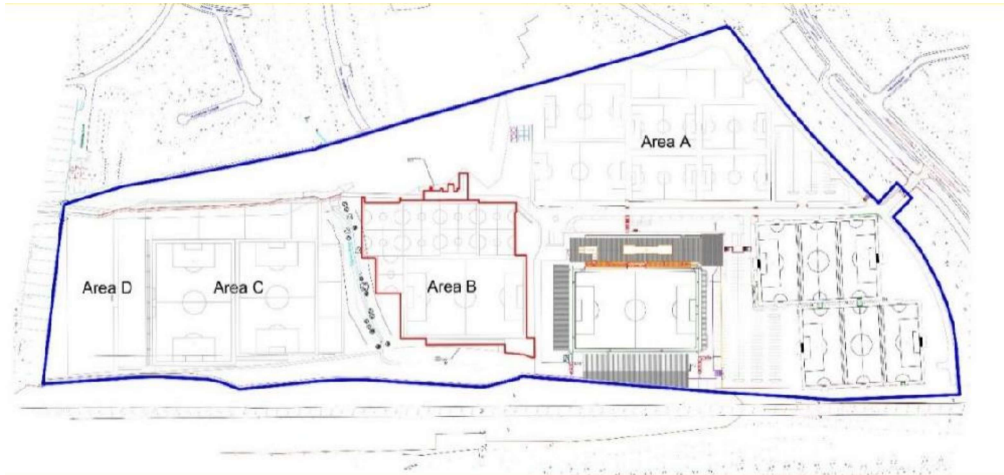


Figure 1: Plan of The Hive Showing Areas A-D

Area A occupies approximately the southern 40% of the site and contains the majority of facilities associated with the Football Centre. It contains the main football pitch and stadium for the men's professional team, two full size grass training pitches for use by the professional team, and two artificial turf pitches (ATPs) that can be used as two full size pitches or six seven-a-side pitches or eight 5-a-side pitches for use by the community. Consent has been granted to build over one of these pitches to provide an indoor pitch for use by Barnet FC's academy and the community.

It also contains the main stadium building which provides office space for the club, a reception venue, an independent diagnostic health centre, clubhouse, and café. In addition, parking for over 400 vehicles is provided in this area.

Photographs of Area A accompany this statement and demonstrate the compact, urban, developed nature of this part of the site. As a minimum the area around the stadium and the car park should be removed from the open space designation because this part of the site functions as a sports stadium not open space, and consent has been granted to build over one of the ATP's. The Hive Football Centre should be designated as a Sports Venue.

The western portion of Area A is fully developed and does not look like, or function, as open space. In addition, the remainder of Area A along with Areas B and C should also be excluded from the open space designation because of the fencing, lighting and hard surfaces and uniform design treatment which gives them the character and appearance of a sports campus, sports complex, sports centre or sports venue, rather than open space.

This is certainly how it has been treated by the LPA and the Planning Inspectorate. In the officers delegated report in respect of Appeal APP/M5450/W/24/3357455, the site is described in the following terms:

"1.1 The Hive Football Centre (formerly Prince Edward Playing Fields) comprises former educational sports grounds, designated as Open Space and allocated for Community Outdoor Sports Use. It is now occupied by a football stadium with ancillary facilities and open-air grass and synthetic football pitches."

Similarly, the Inspector in respect of appeal APP/M5450/W/24/3357455 described the site as follows:

“4. The Hive is a complex of just over 17 hectares and accommodates a sports stadium home to Barnet and London Bees football clubs, a number of grass and artificial grass training pitches, as well as a fitness centre, medical centre, banqueting suite and other ancillary facilities. The appeal site, known as Site C1, is currently unused land within The Hive. It acts as a flood water reservoir basin, is within flood zones 2 and 3 for fluvial flooding, and Zones 3a and 3b for pluvial flooding.”

Finally, the London Borough of Harrow Indoor and Outdoor Sports Facilities Strategy 2024-2037 refers to the site as “The Hive Football Complex” at section 2.4, p.29. It does not refer to it as open space.

This is the common denominator in all these site descriptions. The Hive is never referred to as open space and it is common ground that it is substantially developed and has the character of a sports venue.

In failing to identify sports venues as a category to plan for, and in failing to distinguish between sports venues and open space, the emerging plan does not plan positively for the provision and use of shared spaces, and community facilities. It therefore conflicts with paragraph 98 of the NPPF, and the emerging plan is not positively prepared.

3 The Present Position

The present position therefore is as follows:

1. Up to date evidence in the form of the Indoor and Outdoor Sports Facilities Strategy 2024-2037 demonstrates that there is a need for such facilities;
2. There is no up to date evidence in the form of an Open Space Assessment indicating that the Hive is required to remain designated as Open Space;
3. The pattern of development at the Hive is such that it no longer performs an open space function. The NPPF defines this as follows:

“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.” (Emphasis added).

4. While the Hive is of public value because it offers opportunities for sport it does not, and is unable to, provide the required visual amenity. The characteristic of open space is that it is unbuilt and contains no development, and this is the source of its value for sport and amenity.
5. The Hive is characterised by an extensive collection of buildings, hardstanding, fixed surface infrastructure, fencing and lighting. It is a developed site, and so does not provide the amenity associated with unbuilt land which is provided by open space.

6. Instead, the Hive fulfils the function of developed land. It comprises extant or approved permanent structures and large areas of fixed surface infrastructure including artificial pitches, car parks and pedestrian access routes, fencing and lighting. The Hive has the character and appearance of a sports campus, not of playing fields.

5 Conclusions

So far as the Main Modifications are concerned, this element of the Plan remains unsound and not legally compliant. This is for the following reasons:

- a) The Hive makes an extremely valuable contribution to sports provision in the Brough, and is the premier professional sports venue. It has the potential to continue to do this to the benefit of the wider community, but only if it is not designated as Open Space. The Open Space designation is fundamentally at odds with the objective of expanding sporting provision and facilities on site, especially if they are indoor facilities.
- b) In resisting this, the LPA wish to use an out of date Open Space Assessment justify retaining the site in an outdated designation which no longer reflects the character and function of the site. This will have the effect of preventing new sports facilities being provided on site for which an up to date Indoor and Outdoor Sports Facilities Strategy demonstrates that there is a need.

6 Proposed Changes to make the Plan Sound

In order to make the Plan sound, the following changes should be made:

1. Identify The Hive Football Centre as a sports venue and remove the open space designation from the site; and
2. Amend the Policy Map to remove the Open Space designation from the Hive Football Centre;
3. Amend incidental maps within the Development Plan which show The Hive Football Centre as open space and show it as a sports venue instead