

**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__MM41 Sport and Recreation_____

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.

Policy CI 3 Sport and Recreation MM41

Parts a and b of policy CI 3 B remove the ability for indoor sport and recreation facilities to be effectively promoted in the Borough.

The policy is underpinned by an unjustified assumption that the only sports worthy of promotion are outdoor pitch-based sports. This is not true and does not reflect Government policy in the NPPF, nor the evidence produced in the London Borough of Harrow Indoor and Outdoor Sports Facilities Strategy 2024-2037.

All sport is a good thing for people's health and well-being and for the wider benefits it provides to both society, such as reducing the load on the NHS. If those important outcomes can be better achieved through indoor sport than outdoor sport, then that is to be encouraged. It is not for the LPA to seek to limit indoor sports provision if it provides these health and wider benefits.

The requirements in CI 3 B a for indoor sports facilities to be ancillary in terms of size, frequency, use, and capacity simply removes flexibility and will prevent indoor sports facilities coming forward. It ignores the emergence of new sports and recreation activities which have not yet been identified but which can emerge at very short notice and create very great demand. The new sport of Paddle is a prime example of this.

C I3 B a will prevent new emerging sports facilities from coming forward. The policy is inflexible and takes no account of future provision or requirements. In addition it will not serve to either enhance or increase sporting provision in the Borough which will be to the detriment of its population.

Policy CI3 B b also unreasonably restricts indoor sports facilities from coming forward. If the Council's health and sports objectives can be fulfilled equally through indoor facilities as outdoor, then there should be no reason why outdoor sports and recreational facilities cannot be replaced by indoor ones.

Open Space is dealt with now in a separate policy and is a separate matter. If there are Open Space objections to the loss of those facilities they can be dealt with under policy G 12. However, policy CI 3 deals with sport and recreation and should be flexible and neutral as to the form in which that those facilities are provided.

The only reason the Council could maintain this position is if they were of the view that sports such as football, rugby, hockey and cricket were better than weight training in gyms, basketball, badminton, table tennis or martial arts for instance. This also is not what the evidence in the London Borough of Harrow Indoor and Outdoor Sports Facilities Strategy 2024-2037 demonstrates.

Such an approach is mistaken and the LPA should not seek to impose their choices upon, and restrict demand for, other forms of sporting provision and prevent them from coming forward. There's no reason why indoor sports facilities need to be ancillary to outdoor sports facilities. If indoor facilities can provide equally good access for Harrow's population and facilitate increased participation in sporting

activity (which is an overarching objective of Council policy) then this should be actively encouraged. The approach in parts a and b of policy CI 3 B are unnecessarily restrictive, will hamper indoor sports provision and will prevent the Council's duties in respect of health and equality from being met.

Change Sought

The changes required to make the Policy sound are as follows:

1. Parts a and b of policy CL I3 B should be deleted and the policy should read as follows:

"Proposals for uses that would support existing or proposed indoor and outdoor sport and recreational facilities will be supported."

2. The following text should be deleted;

~~"...where they are:~~

~~a. Ancillary in terms of size, frequency, use, and capacity; and~~

~~b. B. Do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sport and recreational uses."~~