

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__MM44_____

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 G12 Open Space MM44.

1 Introduction

The Council has always intended to produce proper evidence for the open space matter. This is clear from section 12.1 of the IDP which states that:

“A new open space strategy is in progress as the council has recently appointed a resource to drive this forward. The previous open space strategy was published in more than 10 years ago.”

It is also been clear from an early point in this Examination process from the Inspector's preliminary questions, that the matter of an up-to-date evidence base was an issue and that this was unresolved.

For some reason this evidence has never been produced. The matter was raised at the Examination in Public in June 2025 in respect of Matter 4, Issue 5, and the LPA produced a response suggesting three ways in which the absence of the evidence could be mitigated. These approaches were unconvincing on the day and the LPA were asked to provide further justification in the form of a Note. This is the Note dated 3 July 2025 .

There was time from July to November to have produced the open space assessment, even if starting from scratch. The LPA have either failed or chosen not to do this and have provided no explanation why.

2 Response to Note to Inspector – Open Space Evidence 3 July 2025

Examination in Public Note to Inspector – Open Space Evidence 3 July 2025	Objector's Response
6.1 The change in open space across the borough since the production of the last Local Plan amounts to addition of 1.613 hectares and is minimal.	It is clear from paragraph 3.6 of the Note that the Council were unaware of the degree of change to open space until they undertook the exercise. The benefit of this is that if The Hive is removed from the Open Space designation as requested, the resulting shortfall will be less than would otherwise be the case.
6.2 The limited changes in open space indicate that development plan policies to protect open space across the borough are working well. The current	Paragraph 2 of the PPG17 Study Final Report now submitted as part of the evidence base states:

Examination in Public Note to Inspector – Open Space Evidence 3 July 2025	Objector's Response
<p>evidence continues to provide an accurate picture of areas of open space deficiency and is therefore sufficient to support the implementation of policy GI2.</p>	<p><i>“2. The study provides the Council with an understanding of the quantity, quality and accessibility of local open spaces available for public use, and recommends standards of provision. It applies these standards to indicate how well current provision meets current demand, and also compares results across different areas of the Borough and thus looks at how even the provision of each type of open space is.”</i></p> <p>While the Council has produced evidence of quantity it has not in respect of quality or accessibility and therefore the change in open space across the borough does not justify or make good the absence of a properly up to date study.</p>
<p>6.3 The Council's evidence is broadly consistent with that produced by other west London boroughs and reflects that the pattern and amount of open space is not subject to significant change. The IDP is an appropriate location for evidence on open space as a source of green infrastructure.</p>	<p>The amount of open space is not the sole criterion of the missing open space assessment. Quality and accessibility should also be assessed, and neither of these criteria are dealt with in the IDP Summary.</p> <p>It is not clear why the IDP might be an appropriate location for evidence. The correct location is as an independent document in the Evidence Base as the Indoor and Outdoor Sports Facilities Strategy 2024 In any event the evidence on open space is not reliable and does not exist and the Gap Analysis in Chapter 12 of the IDP states:</p> <p><i>“There is a significant gap in the currently published evidence base as the latest open space strategy was published more than 10 years ago.”</i></p> <p>It appears therefore that the LPA's evidence that it has an up to date Open</p>

Examination in Public Note to Inspector – Open Space Evidence 3 July 2025	Objector's Response
	Space Assessment is that it has an out of date open space strategy.
6.4 The Council will update the IDP to reflect the latest position on open space outlined in the Atlas of Change document and take account of population changes that have occurred since 2011. In addition, it is suggested that part A of GI 2 could be modified to note that identified deficiencies should reflect the findings of the latest available evidence.	<p>It is noted that the reason for modification MM44 states</p> <p>If this part of the policy were amended in respect to the now acknowledged point that there is no up to date evidence base, then why are the other points that flow from this also acknowledged and addressed. The LPA concedes that the evidence base is flawed and the corollary or this is that the plan is be neither well founded nor consistent with national policy.</p>
6.5 The Council notes the provisions of policy G4 in the London Plan, which sets out the key content of open space assessments. The policy allows for these assessments to be undertaken at any time.	<p>No it does not, and if it did the policy would say this.</p> <p>To interpret the policy in this way and allow the evidence for the policy to be provided after the policy the evidence justifies is just illogical. If that were the case why is any evidence needed for any planning policy if they can all be created from thin air. This approach is also contrary to all accepted planning practice for the past 78 years since the introduction of the 1947 Town and Country Planning Act.</p> <p>This statement is confirmation that the necessary evidence still does not exist and that the policies that rely on it are not justified.</p>
6.6 A comprehensive update of the Council's open space evidence will be timed to reflect the findings of the London-wide evidence outlined in paragraph 5.2 of this note. The Council will also engage with the Mayor regarding any expected changes to policy G4 in the	The comprehensive update should have occurred already. The timetable in para 5.2 is Autumn 2025 and the present Main Mods consultation is taking place in winter 2025, where is the LPA's comprehensive update ?

Examination in Public Note to Inspector – Open Space Evidence 3 July 2025	Objector's Response
forthcoming draft London Plan, a draft of which is due to be published in 2026.	There is a significant risk that the Council's approach in para 6.5 that the policy can be provided " <i>at any time</i> " will become never.

3 The Evidence Base

The evidence base which supports this policy is not up to date in at least two respects. First policy G4 of the London Plan deals with open space and sets out a rigorous framework for its provision. Policy G4 A 1) states that Development Plans should:

"Undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required.[136] Assessments should take into account the quality, quantity and accessibility of open space;"

No such needs assessment has been undertaken and the LPA have not employed the categorisation set out in Table 8.1 of the London Plan. Their assessment of open space therefore has not been benchmarked against the different types of space required and the quality quantity and accessibility of open space has not been assessed.

As the adopted London Plan is a Development Plan document, emerging policy G12 is by definition not consistent with adopted Development Plan policy G4 of the London plan and cannot be reconciled with it. In addition, as the Needs Assessment has not been undertaken there is no data supplied at all and so this part of the evidence base cannot be up to date as a matter of fact.

Second, not only does this policy conflict with the London Plan, it conflicts with the NPPF. Paragraph 103 of the NPPF states:

"Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."

The LPA's assessment of need for open space is contained in the London Borough of Harrow Infrastructure Delivery Plan (IDP) October 2024. The position is summarised at p.44 and the LPA state:

“Whilst there is no current open space assessment or strategy in place, Harrow is generally well served by open space and a site for a new part has been identified in Pinner.”

This is not a robust assessment and is not NPPF compliant. It does not meet the terms of paragraph 103 of the NPPF. At section 12.1 of the IDP the LPA state:

“A new open space strategy is in progress as the council has recently appointed a resource to drive this forward. The previous open space strategy was published in more than 10 years ago.”

This statement is correct as it was published 15 years ago. This is an excessively long period, and so the evidence base to the Plan cannot have been positively prepared or be effective as it is reliant on out of date evidence. This approach is flawed and therefore unsound.

However, the position is actually worse than this. At p.44 of this document the LPA state that:

“A PPG17 compliant assessment of Harrow’s open space, sport and recreation facilities was completed by Ashley Godfrey & Associates for Harrow Council in 2010. It replaces an earlier assessment, published in 2005. The ‘PPG17 Study (2010)’ provides an audit of the provision of publicly accessible open space. A new open space strategy is in progress; however it has not yet been completed and therefore this section will summarise the findings from the above 2010 report and recent progress. There is a management plan specific to Green Flag provision which identifies a need for three additional Green Flag parks over the next two years.”

A PPG17 compliant statement cannot by definition be compatible with the NPPF because its methodology pre-dates the adoption of the NPPF by a year. By definition therefore it cannot have been prepared with the benefit of it. This in itself is enough to find the plan unsound.

The NPPF introduced a fundamentally different planning system in 2011 from that which preceded it, and which is based on the promotion of sustainable development. All modern national planning policies since 2011 are geared towards this, and planning policies prior to 2011 are out of date.

All development plan documents must follow in the wake of the NPPF, and if they are to be sound, emerging policies must be compliant with the NPPF. This cannot be the case for the LPA’s open space policies if they were produced on the back of evidence prepared under the previous planning regime.

In consequence the evidence base in relation to open space cannot meet the requirements of the NPPF because it was prepared on a different basis. This is a

significant failure in the planning process and production of this local plan, and it is not one that can be easily repaired, if at all.

Not only do the Council not know what level of need there is, they have not accurately assessed the amount of open space in the Borough. As the LPA have not accurately measured need, and the amount of existing open space is inaccurate, the LPA do not know how much open space is required.

The Council are not therefore able to plan to provide that open space and put in place policies that will deliver the required quantity of open space. The net result is that the emerging plan cannot therefore meet need and so is not able to provide for open space effectively to meet need.

In addition, provision of public open space is not just the product of policy G12, it relies on a network of interrelated policies. For instance, if policies relating to housing provision, housing standards, CIL and planning obligations which all combine to provide the open space that the Borough needs.

Indeed, an analysis of open space provision could identify where there is an excess of open space and some open space could be lost to provide much needed housing.

Other policy areas are therefore affected by this failure to accurately predict the need for open space and therefore those policies cannot be in a position to help provide for it effectively. Therefore, the flawed, un-sound approach to open space policy feeds into other policy areas and contaminates them too.

The consequences of this position can again be illustrated with reference to The Hive Football Centre. If the change in character and sporting provision which has occurred on site had been assessed by the Council, an up to date Needs Assessment would have reflected this. It would have become readily apparent that the previous open space designation of the site was no longer appropriate or effective and should be replaced by a new Sports Venue designation.

The result of this would be a net reduction in the Borough-wide open space total which would have to be mitigated in the emerging plan through new allocations or suitable planning policies. Neither of these forms of mitigation have taken place because of the absence of an up to date evidence base has not revealed the discrepancy. The result in the meantime is that the evidence base is out of date to a substantial degree and the emerging local plan is not positively prepared.

4 The Present Position

The present position therefore is as follows:

1. The suggestions tabled by the LPA at the Hearing Session were insubstantial and it was clear they were not enough to replace the missing evidence. The Note dated 3 July 2025 does nothing to alter that position.
2. The LPA were on notice that substantive evidence needed to be provided, and such evidence could have been provided in the period from July until November. The LPA either elected not to, or failed to do this, and have provided no explanation why.
3. Despite the clearest warning to the LPA of the deficiency and despite there being sufficient time in which to plug the gap, the LPA has not taken any substantive action to provide the missing evidence.
4. 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;
5. There is no up equivalent up to date evidence in the form of an Open Space Assessment indicating that the Hive is required to remain designated as Open Space;
6. Indeed, the Hive is 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.
7. The Hive makes an extremely valuable contribution to sports provision in the Borough, 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.
8. The open space designation is fundamentally at odds with and opposed to the objectives of expanding sporting provision and facilities on site, especially if they are indoor facilities.
9. In resisting this, the LPA wish to use an out of date Open Space Assessment to justify retaining the site in an outdated designation which no longer reflects the character and function of the site.
10. 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 there is a need.
11. The outcome will be sub-optimal and unsustainable. Sports provision that is supported by policy will not be able to come forward at a sports venue if the open space designation is maintained. Policy G12 will provide a further barrier as well even though it is based on no evidence.

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) It is not positively prepared because in the absence of an up to date Open Space Assessment the level of provision required has not been tested. This is particularly so given changes to patterns of behaviour and attitudes to health and recreation post COVID. The 2011 Study deal with the pre-COVID world and it is not therefore clear what the Borough actually needs in the absence of the missing proportionate evidence.
- b) The policy will not be effective as there is no provision made for monitoring it. An up to date Open Space Assessment will provide a baseline against which future change to quantity, quality and accessibility of open space can be monitored and enable the effectiveness of the policy to be assessed.
- c) Finally, the absence of an up to date open space strategy conflicts with national policy in the NPPF. The LPA have been given the opportunity to provide the missing evidence base or provide alternative mitigation, but have not done so and have not provided a credible alternative. The Main Modifications therefore remain inconsistent with national policy and the Plan cannot be sound.

6 Proposed Changes to make the Plan Sound

In order to make the Plan sound, the Council should:

1. Prepare an up to date assessment of open space provision and need;
2. Identify The Hive Football Centre as a sports venue and remove the open space designation from the site; and
3. Amend the Policy Map to remove the Open Space designation from the Hive Football Centre;
4. Amend incidental maps within the Development Plan which show The Hive Football Centre as open space and show it as a sports venue instead.
5. Amend Policy G12 A b to read as follows:

“Not result in the net-loss of open space unless that net loss is caused by provision of new indoor or outdoor sports facilities acceptable under policy CI 3 “