

**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.

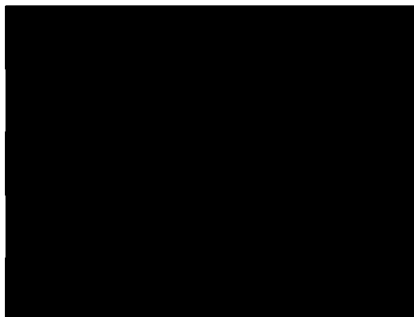
Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title



Mr

First Name

John

Last Name

Shephard

Job Title

Director

Head of Planning

(where relevant)

Organisation

Paragon Developments Ltd

J & J Design

(where relevant)

Address Line 1

1A King Edward Road

Line 2

Bedford

Line 3

Line 4

Post Code

MK41 9SF

Telephone Number

E-mail Address

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_____ MM15 – Policy GR10_____

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.

Paragon Developments Ltd supports the proposed changes to Policy GR10 as they provide greater clarity and flexibility for the delivery of small site housing, which is essential to meeting Harrow's housing targets. The revised wording aligns with National Planning Policy Framework (NPPF 2024, paragraph 73) and London Plan Policy H2, both of which recognise the important role of small and medium-sized sites in addressing housing needs and enabling quicker delivery of homes.

The modification acknowledges that suburban character will evolve over time and that gentle densification is necessary to respond to housing pressures. This approach is positively prepared and justified, as it balances the need for new homes with the protection of local character and amenity. It also reflects evidence from the Small Sites

Capacity Study (2022) and supports the development of design codes to provide certainty for applicants and decision-makers.

By encouraging development in sustainable locations and requiring high-quality design, the modification ensures consistency with national policy and effectiveness in implementation. It will help unlock constrained sites such as garage courts and backland plots, which are often underutilised, while safeguarding residential amenity and biodiversity through appropriate design standards.

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.)

No further changes requested. The wording of MM15 is supported as drafted.

(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.