



London Borough of Harrow  
Planning Policy Team  
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Harrow  
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22 December 2025

Dear Sir or Madam

**Representations on the Harrow Local Plan (2021-2041) EiP Schedule of Proposed Main Modifications  
(November 2025)**

On behalf of our client, S2 Estates, we are writing to provide comments in response to the Council's consultation on the Draft Harrow Local Plan Schedule of Proposed Main Modifications, following the hearing sessions that took place in June, July and October earlier this year.

The following paragraphs set out comments on the Draft Harrow Local Plan (Main Modifications) on behalf of S2 Estates.

**General principles**

S2 Estates is supportive of paragraph 1.1.28 which makes clear that the existing housing stock makes a significant contribution to meeting local housing need. While the delivery of new housing is essential in addressing Harrow's housing requirements, it is important to acknowledge the role that existing buildings, where opportunities for repurposing exist, especially those in close proximity to train stations and in urban areas can play in contributing to overall housing delivery. This amendment supports the direction of travel set out in the recently published draft NPPF (Dec 2025) and the need to increase housing delivery nationally and specifically in London. We therefore request that the policy is amended to acknowledge this.

**Housing (Draft Strategic Policy 03 and Draft Strategic Policy 04)**

S2 Estates supports Draft Strategic Policy 03, which states that 5,250 new homes will be delivered on small sites.

In relation to housing mix, Part 5 of Strategic Policy 03 has been amended to increase the strategic target for the provision of three-bedroom larger family-sized dwellings from 25% to 35% in all new housing developments. While S2 Estates supports the principle of delivery of family housing, this blanket requirement requires further consideration / flexibility to be applied, in light of site specific constraints and potential barriers to delivery.

In particular, the policy should fully acknowledge the challenges associated with retrofitting existing buildings and more specifically securing the retention of heritage assets, including both designated and non-designated heritage assets, which may limit the ability to deliver larger units on certain sites.

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To ensure the policy remains justified, proportionate and realistic, the policy should be amended to recognise that a lower percentage of family-sized homes may be acceptable within developments that relate to designated and non-designated heritage assets or structurally unsound buildings to ensure the development remains viable and does not impede on the delivery of housing. Additionally, the 35% requirement should apply to major developments only, in order to ensure the viable and appropriate delivery of housing on small sites.

To reflect this, we have set out suggested additions / amendments to the policy wording below, shown in red text:

*B. Mix of Housing by size: A strategic target has been set to ensure a minimum 35% (4,000) of all new dwellings delivered **as part of major developments** are three bed (or more) family sized dwellings across the Borough over the plan period.*

- i. **For developments that relate to heritage assets (including non-designated heritage assets) or structurally unsound buildings, a lower provision of family sized dwellings (25%) may be acceptable where justification is provided.***

Strategic Policy 04 requires the Council to support proposals that contribute to the vitality and viability of the local economy by providing a range of uses appropriate to their location in terms of both scale and use class. S2 Estates supports this approach and considers that the policy should be amended to explicitly include residential development as a supported use within town centres, where appropriate, in order to reflect national policy (NPPF paragraph 90a).

#### **Marketing evidence (Appendix 6)**

Table A6.1 sets out the marketing and vacancy requirements associated with policies that require evidence of marketing and/or vacancy to support a change of use. Paragraph A.6.7 specifies the detailed requirements for any accompanying marketing report.

While S2 Estates recognises the purpose of marketing and vacancy requirements in managing the loss of specific use classes, the current approach is overly rigid and fails to account for exceptional circumstances. In particular, it does not adequately address situations where buildings are long term vacant (3+ years) and / or considered to be a dangerous structure (as proven by a qualified structural surveyor) or at imminent risk of collapse.

In such cases, prolonged marketing requirements can actively undermine the potential for shorter-term positive repair, re-use, and regeneration of unsafe and deteriorating buildings. Requiring 12 months of marketing evidence in these circumstances is neither justified nor effective and risks continued deterioration or ultimately complete loss rather than shorter-term intervention and reinstatement.

It is therefore strongly recommended that the policy is amended to remove the requirement for marketing and instead require a market report (independent agent opinion on market need for the use, local supply etc) where a building has been considered to be demonstrably unsafe or a dangerous structure. This will ensure the policy is proportionate, flexible, and capable of facilitating sustainable development and future retention and restoration / retrofit of existing buildings of merit.

To reflect this, we have set out suggested additions to the policy wording below, shown in red text:

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*A.6.7 In exceptional circumstances, alternative evidence in place of full marketing or evidence requirements as detailed within Table A6.1 may be acceptable. Such evidence may include an independent market opinion report assessing demand for the existing use, local supply, and the feasibility of continued occupation, where this would facilitate the repair, retrofit, and retention of existing buildings.*

#### **Energy efficiency and building adaptation (Draft Policy CN1 and GR3B)**

Draft Policy CN1 states that the use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings.

Draft Policy GR3B requires new build conversions / change of use of existing buildings to consider the requirement for counter terrorism and secured by design measures.

S2 Estates supports the objectives of both policies. However, it is important that their application fully acknowledges site specific constraints, heritage considerations and the viability associated with retrofitting existing buildings. This is particularly the case where there is a need to balance energy efficiency measures with security requirements. Accordingly, such requirements should only be applied to major development or in circumstances where site specific uses demonstrably necessitate the incorporation of these measures.

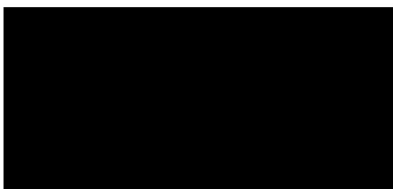
Furthermore, the application of both policies should be proportionate to the scale of development, with appropriate flexibility afforded to minor developments.

#### **Summary**

In summary, S2 Estates expresses general support for the housing, design and sustainability policies of the Draft Local Plan as outlined in this letter. However, it is essential that the Council fully acknowledges site specific circumstances, constraints and viability challenges when seeking to apply general policies across the Borough. In particular, policies should be amended to specifically reflect site / building specific circumstances, and allow a degree of flexibility that would not otherwise be required through strict application of the policy. Suggested amendments to policies have been cited associated with restoring heritage assets, and / or those buildings which are structurally unsound or long term vacant to facilitate and expedite the retrofitting of buildings for much needed housing and commercial uses in Harrow.

If you have any queries in relation to the representations made on behalf of S2 Estates, please do not hesitate to contact myself or my colleague Richard Henley.

Yours sincerely



Enc. Representation form