

## 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)

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**Please return to London Borough of Harrow, New Local Plan, Planning Policy Team, Forward Drive, Harrow, HA3 8FL / [local.plan@harrow.gov.uk](mailto:local.plan@harrow.gov.uk) by 12:01pm on Tuesday 23 December 2025.**

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*For further information regarding how we store and process your data, please visit the New Local Plan webpages at [www.harrow.gov.uk/newlocalplan](http://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](mailto:DPO@harrow.gov.uk)*

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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)**

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**Please go to the next page.**

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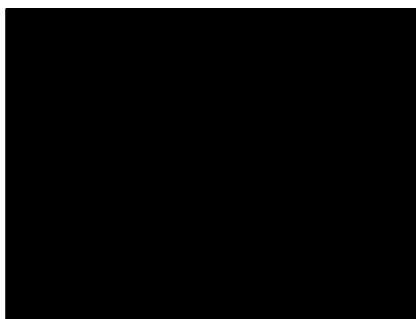
**Part A**

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**1. Personal Details\***

*\*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



Miss

First Name

Lauren

Last Name

Manoharan

Job Title

Senior Planner

(where relevant)

Organisation

 OBO S2 Estates

hgh Consulting

(where relevant)

Address Line 1

13-14 Welbeck Street

Line 2

London

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

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## Part B: Section 1: Your Representation

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**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)**

Supporting Paragraph 1.1.28

**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.

S2 Estates is supportive of paragraph 1.128 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.

In the absence of explicit recognition of this, the policy risks being un-justified as it fails to maximise the contribution that existing buildings can make to meeting identified housing needs.

**What change do you want the Inspector to recommend?**

(Please be as precise as possible. If you are asking for wording please supply it.)

We request the policy to be amended to acknowledge the role of existing buildings in contributing to housing delivery / provision as well as the development of new housing.

*(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

**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 Strategic Policy 03

**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.

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.

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. Further details are found in the attached covering letter prepared by hgh Consulting.

*(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.)

Additions / amendments to the policy are set out in red below:

*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.*

#### **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

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## Part B: Section 1: Your Representation

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**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 Strategic Policy 04

**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.

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 but 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).

**What change do you want the Inspector to recommend?**

(Please be as precise as possible. If you are asking for wording please supply it.)

Strategic Policy 04 should be amended to explicitly include reference to residential development as a supported use within town centres, where appropriate, in order to reflect national policy (NPPF paragraph 90a).

**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

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**Part B: Section 1: Your Representation**

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**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 Appendix 6

**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.

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.

### **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.)

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

*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 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.*

### **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

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### **Part B: Section 1: Your Representation**

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**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 Policy CN1

**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.

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. However, it is important that the 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.

**What change do you want the Inspector to recommend?**

(Please be as precise as possible. If you are asking for wording please supply it.)

That draft policy GR3B applies energy efficiency requirements only to major developments or to developments involving uses where such measures are demonstrably necessary, and that the policy explicitly allows flexibility where site constraints, heritage considerations, retrofit viability limit their appropriate application.

## **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       X No

**If yes, please briefly say why appearance is needed** (The Inspector will decide who appears.)

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## **Part B: Section 1: Your Representation**

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**Please complete a separate Section B for every modification you wish to comment on.**

**Which document are you commenting on?**

X 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 Policy GR38

**Does this modification make the Plan legally compliant?**

Yes  
 X No  
  Don't know

**Does this modification make the Plan sound?**

X Yes  
  No

**If you think it is not sound tell us which test(s) it fails?**

Positively prepared  
 X 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.

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 policy approach however, it is important that the policy 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.

#### **What change do you want the Inspector to recommend?**

(Please be as precise as possible. If you are asking for wording please supply it.)

That draft policy GR3B be amended to apply counter-terrorism and Secured by Design requirements only to major developments or to developments involving uses where such measures are demonstrably necessary, and that the policy explicitly allows flexibility where site constraints, heritage considerations, retrofit viability, or competing sustainability objectives limit their appropriate application.

#### **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

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#### **Part B: Section 3: Data protection**

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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](http://harrow.gov.uk/newlocalplan).