

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	Michael	
Last Name	Priault	
Job Title (where relevant)	Chair	
Organisation (where relevant)	Swifts Local Network: Swifts & Planning Group	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
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?

ticked **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)

MM45

Does this modification make the Plan legally compliant?

ticked **Yes**

- No
- Don't know

Does this modification make the Plan sound?

ticked **Yes**

- No

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

- Positively prepared
- Justified

ticked **Effective**

ticked **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.

The modification MM45 for Policy GI3 (G) (c), pp231-232 Policy and supporting text, regarding "wildlife enhancements",

is not sound as the wording and how it will work in practice is not effective nor consistent with national policy, i.e. NPPG Natural Environment 2025 paragraph 017 on swift bricks. This paragraph 017 ensures the provision of wildlife enhancements being a minimum number of swift bricks which are permanent, and suitable for a wide range of species which are target species.

(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.)

To make the modification to Policy GI3 (G) (c) sound, effective and consistent with national policy, please add the key wording of NPPG Natural Environment 2025 paragraph 017 regarding swift bricks which are wildlife enhancements.

Here is the key wording from NPPG Natural Environment 2025 paragraph 017:

"New developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."

Here is the relevant link for the NPPG, and I have also copied out the full text below for reference:
<https://www.gov.uk/guidance/natural-environment>

Many thanks.

Full text from NPPG Natural Environment 2025 paragraph 017:

The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

Paragraph: 017 Reference ID: 8-017-20250609

(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?**

ticked Yes

No

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

To provide further information, if required.

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.

ticked Yes, I understand my representation will be made public.
ticked Yes, 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.