

# Response to the Proposed Main Modifications to the Harrow Local Plan (2025)

**Submission from: Harrow Monitoring Group**

*A community-based group with insight into how planning decisions influence daily life, belonging, and opportunity, committed to promoting inclusive and sustainable communities in which everyone can thrive*

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## 1. Introduction

The Local Plan is Harrow's most significant long-term planning document, shaping decisions on homes, employment, infrastructure, community facilities and the built environment for the next 15–20 years. Because it affects every resident and determines how the borough will evolve, it must be accessible, inclusive, and aligned with the lived realities of the population it is intended to serve.

Harrow's exceptional ethnic, linguistic and cultural diversity\* makes clarity, inclusivity and accessibility fundamental requirements. The Plan should communicate in plain language, avoid unnecessary jargon, and meaningfully reflect the needs, practices and experiences of its communities. An inclusive Local Plan is not simply desirable - it is essential for ensuring fair, equitable and effective outcomes for the whole borough.

However, the proposed Main Modifications represent a missed opportunity to make the Local Plan more accessible, relevant and meaningful to all residents. While they correct technical errors and improve structural consistency, they fail to address the deeper issues of clarity, cultural understanding and community engagement. The document remains written in professional planning language, largely inaccessible to non-specialists, and insufficiently reflective of the socio-cultural diversity that defines Harrow.

In its current form, the Local Plan continues to function primarily as a technical and regulatory document rather than a community-focused one. It is not yet shaped around the needs, communication preferences or lived experiences of Harrow's residents. The modifications improve precision and layout, but they fall short of transforming the Plan into a genuinely community-orientated framework.

This shortcoming also raises important concerns about the **meaningfulness of consultation** with the wider public. When a key planning document is expressed in complex, technical language, it excludes many residents from effective participation - particularly in a borough where a significant proportion of people speak languages other than English at home. Without plain-English summaries, visual aids, or culturally sensitive explanations, consultation risks becoming a procedural exercise that engages only those with prior planning knowledge, rather than a genuine dialogue with the communities whose futures the Plan will shape.

\* 36.5% of residents identify as "White" and 45.2% as "Asian, Asian British or Asian Welsh". The borough includes a wide variety of languages, religions and cultural traditions, and a high proportion of multigenerational households.

Coordinator

Harrow Monitoring Group

former Harrow councillor and a member of the planning committee, also former Inspector of Schools (Ofsted)

## **2. Assessment of main modifications**

### **2.1 Strengths**

The modifications address minor corrections, factual updates, typographical errors, and improve clarity and consistency (e.g., AM38, AM44).

Some changes align supporting text with policy headings, aiding internal consistency (e.g., AM29).

Adjustments to paragraph breaks and numbering marginally enhance readability.

Overall, the schedule demonstrates an attempt to improve the technical and structural quality of the document.

### **2.2 Weaknesses / concerns**

#### **2.2.1 Jargon and complexity**

Many policy paragraphs still rely heavily on technical planning terminology and acronyms (e.g., GR2, HO2, NPPF).

Most corrections tidy wording rather than meaningfully simplify language for non-specialist residents, reducing the practical accessibility of the document.

#### **2.2.2 Simplicity and readability for a diverse audience**

The document still reads primarily as a professional planning manuscript.

No plain-English summaries, diagrams, or resident-focused explanations have been introduced.

Limited consideration is given to residents for whom English is not a first language.

#### **2.2.3 Socio-cultural compatibility**

Only one paragraph explicitly acknowledges cultural practices relevant to Harrow's population (AM45, para 4.6.2).

Modifications do not substantially reflect the needs of multigenerational households, language diversity, or culturally specific spatial requirements.

Given Harrow's demographic profile, a stronger integration of lived experience and cultural context would be expected.

#### 2.2.4 Internal consistency and structural layout

The number of corrections relating to paragraph structure, alignment, and policy titles suggests that the original document contained significant internal inconsistencies.

Despite some improvements, the document remains difficult to navigate for non-expert readers.

### 2.3 Overall judgement

While the Main Modifications enhance accuracy and organisation, they do **not** meaningfully advance the accessibility or cultural relevance of the Local Plan. The document remains highly technical and insufficiently attuned to Harrow's diverse communities. The persistence of jargon, structural complexity and limited cultural context suggests that the modifications were not undertaken with community readability as a central objective.

Given the scale of corrections required and the continuing barriers to understanding, there is a strong case for officer training in plain-English drafting, cultural awareness and accessible document design.

### 3. Case for officer training

Numerous corrections for vocabulary, grammar, and structure demonstrate that officers would benefit from training in:

- Plain English and accessible policy writing
- Cultural and linguistic sensitivity in drafting planning documents
- Effective document design, layout, and navigation
- Quality assurance processes to ensure accuracy, consistency, and readability

Such training would help prevent recurring issues, improve public engagement, and support the aim of producing planning documents that serve the borough's entire population fairly.

### 4. Recommended actions, including additional modifications

1. Publish a plain-English summary or community-friendly version of the Plan.
2. Introduce a glossary explaining planning terms, acronyms, and key concepts in everyday language.
3. Embed cultural and household diversity more explicitly in relevant policy sections (e.g., housing, design, community facilities).
4. Improve document layout with clearer headings, visual aids, and simplified structure.
5. Provide officer training in accessible writing, cultural awareness, and inclusive communication.
6. Strengthen consultation practices to ensure meaningful engagement from linguistically and culturally diverse communities.
7. Review internal consistency and readability as an ongoing quality-assurance process rather than relying on Examination to identify issues.

## References

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