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Our ref: PL00795340

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By email only

20 December 2024

Dear Planning Policy Team,

## Re: London Borough of Harrow - Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the above consultation document, and for the short extension to the consultation period to allow us to respond. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

This letter comprises a summary of our key feedback, with more detailed comments supplied in an Appendix. Our feedback is focused on the historic environment and related policies within the draft plan, with reference primarily to the National Planning Policy Framework (NPPF) Chapters 2 (Local Plans) and 16 (Historic Environment), the Historic Environment Planning Practice Guide (PPG) and the London Plan (LP) Chapters 3 (Design) and 7 (Heritage and Culture) of.

Please note that the advice provided herein is based on the information that has been provided to us within the consultation documents. It does not affect our obligation to advise on and potentially object to any specific proposal, subsequently arising from these documents, should it have adverse effects on the historic environment.

### Summary of advice

We can see that considerable effort has gone into progressing the local plan since the Regulation 18 consultation and that Harrow have been proactive in actioning our Regulation 18 comments. In particular, we welcome that:

- The historic environment forms a discernible thread throughout the plan, with welcome references from the borough profile and vision, through to the main heritage policy section and related policies such as LE4, C13, GI1, CN1.
- That, for the most part, the plan avoids mixing the terminology from historic environment legislation and policy. The former relates to specific heritage assets, whereas the latter interprets how the aims of that legislation are to be met, using a significance-based framework



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that is universally applicable to all heritage assets. This provides an internal consistency that is easier for readers to follow.

- The plan promotes the integrated management of the historic and natural environment to optimise the delivery of co-benefits in line with Natural England and Historic England's joint position statement and Natural England's guidance for Green Infrastructure and Nature Recovery.
- That action has been taken to begin updating Harrow's Archaeological Priority Areas in line with the London Plan's tiered system.
- The updated Views Management Guidance (whilst only briefly reviewed due to capacity) appears to clearly delineate how the management of visual amenity (to people) differs to, but intersects with, the management of the significance of heritage assets. This is an important point that we would like made clearer in the plan itself.

Our key comments herein are largely focused on the elements of the plan that were not included in the Regulation 18 Consultation, namely the site allocations and evidence base – specifically the Harrow and Wealdstone Opportunity Area Tall Building Study (hereafter the Tall Building Study). They also pick up on a few points from our Regulation 18 response that remain unresolved or require further attention now that the whole plan is available for review. Detailed comments on the draft plan are provided in Appendix A, and detailed comments on the Tall Building Study are provided in Appendix B. All comments in the Appendices are referred to by a reference number prefixed with 'HE'. These are used below to cross reference between the summary of feedback and the detailed comments.

Broadly speaking, our key concerns in relation to the potential soundness of the plan relate to the policies in Chapter 2: High Quality Growth (e.g. Appendix A, HE references: HE2-13) and Chapter 3: The Historic Environment (e.g. Appendix A, HE references HE14-28) and Chapter 11: Site Allocations (e.g. Appendix A, HE references HE34-46). Our comments seek to ensure that the plan sets out a clear and unambiguous positive strategy for the historic environment, which conforms with the NPPF and London Plan.

In terms of the positive strategy, there are five main areas that we would like to see addressed. The first is that good growth is context/design led and includes a consideration of the significance of the historic environment from the outset (HE3). By identifying what contributes to significance and what does not, it is possible to avoid and minimise harm to the historic environment and ensure that historic character and a sense of place is retained and enhanced (i.e. that heritage is at the centre of place-making). It is important that this point comes through in GR1 and not just the heritage policy.

The second area relates to managing the risk that tall buildings in inappropriate locations pose to the historic environment. In this regard, we encourage some further caveats around exemplary design (HE2 and HE10), tall building allocations *may be* being appropriate for tall buildings (pending the outcome

of assessment) (HE7), and not allowing all tall buildings sites being built out to the maximum appropriate height (HE7).

The third area relates to ensuring that the urban environment is sustainably managed in the round with the distinction and overlaps between townscape, views/visual amenity and the historic environment (HE4, HE9, HE12 and HE15). This is because these areas are often conflated, leading to inadequate assessments being supplied to decision makers with unintended consequences for the delivery of sustainable development.

The fourth area relates to the Historic Environment policies. A series of recommendations are made in relation to these, but our key concerns are that they are strengthened in relation to place-making (HE14), with further criteria added to help manage applications for conservation areas (HE22), listed and locally listed buildings (HE24) and non-designated archaeological remains (HE25).

Lastly, in relation to the site allocations (Appendix A, HE34 – 46), we advise that:

- An overarching caveat is added stating that the baseline heritage assets identified for each site are only a guide and are not exhaustive.
- Protected views and heritage considerations are separated out, with any heritage assets in the view separately listed as a heritage consideration (e.g. Church St Mary, Harrow in the Hill Conservation Area).
- The implications of the heritage considerations in terms of the development principles are more consistently and robustly articulated. Particularly, for sites of higher sensitivity such as those in South, West and East Harrow, GB1- The National Orthopaedic Hospital, O5 – Harrow School Estate and John Lyon School, O13 – Harrow Arts Centre, and O18 - Westenholme. This should include opportunities for enhancement, or wider heritage related public benefits.
- It is made clear that sites ‘may’ be appropriate for tall buildings (subject to assessment), and definitively stated where they are not.
- Appropriate heights for tall buildings are included.

In our Regulation 18 response we highlighted that heritage impact assessments may be required to justify and inform the development principles of site allocations with heritage sensitivities. Upon review, we are content that strengthening the site allocations development principles, particularly for the sites listed below, will suffice to ensure that they set out a positive strategy for the historic environment:

- All site allocations for tall buildings in South, West and East Harrow sites.
- GB1- The National Orthopaedic Hospital.
- O13 – Harrow Arts Centre.
- O15 and OA16 Kodak.



- O18 - Westenholme.

However, we note that a particularly sensitive site – O5 Harrow School Estate and John Lyon School – relies on a masterplan supplementary planning document that was produced in 2015. As this is now nearly ten years old, we advise that it is reviewed and updated, as necessary. We also advise that the Old Church Conservation Area boundary is reviewed as Site O18 – Westenholme positively contributes to the significance of the conservation area and likely warrants inclusion as part of it.

Comments made in relation to the Tall Building Study (Appendix B, HE47-52) mainly relate to the way in which the historic environment has been considered too narrowly as ‘built heritage’ and the fact that significance has not been considered. Fortunately, on this occasion, the consequences arising from this are limited. However, a couple of straight forward amendments are suggested to the study to address points of inaccuracy that could become embedded in forthcoming proposals and lead to unintended consequences.

Lastly, we note that the draft plan includes several references to an emerging Masterplans for Harrow. We welcome this and encourage early consultation with ourselves, so that we can support the role of heritage in the area’s place-making and help identify opportunities for enhancement and wider sustainable co-benefits. We also advise that your own Conservation Officer(s) are involved in the drafting of the masterplan as they will be well-placed to add value.

We hope that our comments are helpful. All should be easily addressed by editing, and we have endeavoured to provide support with these. With the edits advised herein implemented, we consider that the plan would likely be found sound in relation to managing the historic environment. Please do not hesitate to contact me should you have any clarifications or queries. Otherwise, I look forward to further discussing my feedback with you soon.

Regards,

[Redacted]  
Historic  
E-mail: [Redacted]





## Appendix A: Detailed Comments on the draft Local Plan

(Please note that for amendments suggested deletions are generally indicated by text being struck through (e.g. ~~deleted~~) and additions are highlighted by red text).

Comment Reference	Page	Section	Comment
HE1	23-25	Spatial Strategy	We welcome that our suggested text has been included here. However, we should have been clearer in suggesting that the proposed text replaced the first sentence. As edited, it reads as duplicate text: <i>'Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected. The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated.'</i> Instead, we intended: <i>'The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise.'</i>
HE2	30	Strategic Policy 01.C, High Quality Growth	We welcome the requirement in this policy for tall buildings to be of high-quality design and appropriate height. It also states that they should comply with the Tall Buildings policy, which makes sense. However, we would query if this could be misconstrued as suggesting that this is the only policy that they need to comply with, and whether a generic reference to other plan policies or reminder to read the plan as a whole might be helpful?
HE3	32	Strategic Policy 01, High Quality Growth and Supporting Text paras. 2.07 and 2.08	We welcome the references at paragraphs 2.07 and 2.08 to the Harrow Characterisation and Tall Building Study, and to the fact that the significance of heritage assets is required when considering design. However, we would recommend that this is expanded to better articulate the integral relationship between good design and the historic environment. We note that there is a paragraph to this effect in the historic environment chapter so perhaps pull this up or cross reference to it?  As a point of accuracy, we'd also query if policy HE1 should be cross-referenced rather than S02?
HE4	34	Policy GR1.B, Achieving a High Standard of Development	We welcome this policies requirement for development to be design-led and support the text at para. 2.13. However, we would ask for the historic environment and protected views to be specifically referenced as elements of the local context in line with the GLA's guidance and the National Design Guide.
HE5	37	Policy GR1.B, para. 2.1.8	Paragraph 2.1.8 would benefit from clarification. It states that development in character areas should be considered against Harrow's Tall Buildings Supplementary Planning Document (SPD). We would query if it what it means to say is that development in areas identified as potentially appropriate for tall buildings must be considered against this guidance? And, if so, would it be better





			referenced along with the guidance mentioned at 2.1.3? Is it also worth adding that Harrow has a range of Conservation Area SPDs that should help shape high quality design in those areas?
HE6	44	Policy GR3A.F, Inclusive Design	We support the ambition of policy GR3A.F and the reference to our Improving Access guidance at para. 2.3.16. However, we are concerned by the wording ‘...and substantial harm to the heritage significance of the asset is avoided.’ Substantial harm is a high test and, where it is the result of a proposed development, local authorities should refuse consent unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm. The NPPF makes it clear that instances where public benefits outweigh substantial harm should be "exceptional" in most cases, or "wholly exceptional" in respect of assets of the highest significance. For conformity, we therefore advise that this wording is amended. For example: <i>‘Accessible and inclusive adaptations of heritage assets will be supported if harm to their significance is avoided and minimised, as well as outweighed by the public benefit of the adaptation.’</i>
HE7	52	Policy GR4.B, Building Heights	We support criteria GR4.B and would query if it could be strengthened and include a caveat about the appropriate heights not being automatically acceptable and still requiring a full assessment of effects in line with policy. We also suggest that it is made clear, as per the Harrow and Wealdstone Tall Buildings Study (2024), that only a minority of buildings within the tall building areas should reach the maximum appropriate height indicated. For example, <i>‘Applicants should not assume that any height up to that stated is automatically acceptable. Proposed appropriate heights remain subject to a full design assessment at the point of application and only a minority of buildings within the tall building areas should reach the maximum appropriate height indicated. Proposals shall not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.’</i> (Note it may be that these are better as separate policy criteria, perhaps with the point re. acceptable heights being integrated into GR4.E. It may also be that some of this requires consideration in Strategic Policy 01).
HE8	52	Policy GR4.C Building Heights	To improve clarity, we suggest that ‘restrict’ is replaced with ‘resist’ or ‘will not support’. Otherwise, clarification of what restrictions there will be is needed.
HE9	52	Policy GR4.E.b Building Heights and para. 2.4.11	We welcome the inclusion of criteria GR4.E.b, which seeks to safeguard protected views. However, management of heritage assets, views and townscape is overlapping, and we advise that the need to consider all three is mentioned here. A similar expansion of para. 2.4.11 would be welcome.  As a point of accuracy, please note that ‘local heritage views’ is a misnomer and would, in our view, be best replaced. My inference is that this policy seeks to refer to ‘protected views and vistas’, and the landmarks, local heritage assets, etc., within them.
HE10	55	Policy GR4 Building Heights,	We welcome and support the requirement in para. 2.4.8 that all new tall buildings ‘must be of exemplary design’. In fact, we





		Supporting Text, Para. 2.4.8	considerate it to be a really critical requirement (that would support the ambition of Strategic Policy 01) and we recommend that it is elevated to the main policy at GR4.E.
HE11	59	Policy GR4A: Basement Development, Supporting Text, para. 2.4.1.6 & 2.4.19	We welcome that the supporting text to Policy GR4A refers to the historic environment. However, the key heritage concern in relation to basements will be the potential impact of construction on archaeological remains. We therefore recommend that a sentence is added (perhaps at para. 2.4.19?) which highlights this. The new text should explain that any basement proposals within an Archaeological Priority Area (APA) will need to undergo consultation with the Greater London Archaeological Advisory Service (GLAAS) and be accompanied by a desk-based assessment. Alternatively, a cross-reference to the requirements of HE1.H could be added (provided that HE25 is actioned).
HE12		Policy GR5: View Management and Supporting Text	<p>Protected views are managed and assessed in relation to their visual amenity (meaning the overall pleasantness of the views they enjoy of their surroundings) to people. Heritage assets and townscape contribute to visual amenity, and an understanding of their value to the view (acquired from the relevant baseline and assessments) should be made clear in the visual impact assessment. However, protected views may also be important to understanding and appreciating the significance of heritage assets. Visual impact assessments do not assess the effect of the proposed development on the significance of the heritage asset in the view. A separate Heritage Impact Assessment (HIA) is required for that, in the same way that a separate townscape assessment is needed to understand the effect of development of the value of any townscape in the view. In other words, change to a protected view from, or of, a heritage asset (e.g. St Marys Church and Harrow on the Hill Conservation Area) should trigger the need for a separate HIA, in addition to a visual impact assessment (and potentially a townscape assessment if there's townscape in the view).</p> <p>We believe that it is important to draw this point out in the policy and supporting text to GR5, because the purpose of the three assessments is often misunderstood and conflated, leading to inadequate information being provided to decision-makers. This can lead to unintended consequences and be particularly detrimental in terms of delivering sustainable development, as change that may be acceptable in relation to visual amenity or townscape, may not be in heritage terms. This is particularly relevant to para. 2.5.3 which discusses how new development can enhance views and townscape.</p> <p>A good place to make the suggested edit, could be after para. 2.5.1. which says: '<i>...views towards Harrow on the Hill and St. Mary's Church reinforce the historical and cultural importance of that place.</i>' This is correct. But the point could also be made here that views are also important protected views of (or from) heritage assets are part of their setting and contribute to their significance or the appreciation of their significance. Therefore, an HIA is also required.</p>





HE13	64	Policy GR6. Areas of Special Character	<p>We would query the reference to substantial harm here as (per HE6), it is a high test. Therefore, it may be beneficial to reconsider this wording.</p> <p>Separately, please note that we welcome the supporting text at para. 2.6.8 and 2.6.10.</p>
HE14		Strategic Policy 02: Historic Environment and Supporting Text	<p>We welcome the amendments to this policy, but in terms of conformity with the NPPF and London Plan we would query if the policy could mention ensuring that the historic environment is central to place-making, potentially including the promotion of heritage-led regeneration, particularly where this brings long term value and sense of place to development.</p> <p>Similarly, a point regarding the use of Article 4 Directions and taking enforcement action where necessary would be beneficial. We mention the latter as there is some good supporting text on the matter, but no clear hook in terms of policy criteria. (See HE18)</p>
HE15		Strategic Policy 02.A.e Historic Environment	<p>We suggest clarifying Strategic Policy 02.A.e as per HE12. For example, <i>'Ensuring that new development within the locally strategic protected views (as set out within the policies map) does not harm views the significance of heritage assets within those views, for example, St Mary's Church spire and on Harrow on the Hill Conservation Area.'</i></p>
HE16		Strategic Policy 02.C Historic Environment	<p>We welcome the ambition of Strategic Policy 02.C but suggest that it might be more clearly stated. For example, <i>'Support the integrated management of the natural and historic environment where they conserve and enhance the significance of both and optimise co-benefits, especially for climate change.'</i></p>
HE17		Strategic Policy 02.B and D and Historic Environment	<p>Whilst we do not seek to encourage duplication, Strategic Policy 02.B and 02.D paraphrase points made in the NPPF and to avoid any issues with conformity it may be best to repeat them verbatim.</p>
HE18		Strategic Policy 02: Historic Environment, Supporting Text	<p>We welcome that there is some strong supporting text, but we suggest that its structure is revisited to ensure that all points mentioned have a hook in the preceding policy and follow the order of points covered. (See HE14)</p>
HE19		Strategic Policy 02: Historic Environment, Supporting Text para. 3.04 and HE1: Historic Environment, Supporting Text para. 3.1.17	<p>We welcome that Harrow is updating its APAs in line with the London Plan. This merits inclusion in the supporting text, perhaps at para. 3.04. where it states that the council will continue to work with partners to keep up to date evidence on heritage assets.</p> <p>The same point could be made and expanded upon at para. 3.1.17. Here it would be worth explaining what the new tiers will mean for applicants (i.e. that tier 1 sites are equivalent to nationally important remains and subject to the same policies).</p>
HE20		HE1.A Historic Environment	<p>HE1.A could draw together the points made at HE and be amended to something like: <i>'The council will support proposals that secure the preservation conservation or enhancement of a heritage asset's significance (including any contribution made by setting), put the historic environment at the centre of place-making or and secure opportunities for sustainable enjoyment of the historic environment.'</i></p>







HE21		HE1: Historic Environment, subtitles	Apologies as edits suggested at Regulation 18 have not worked well. It is recommended that the designated and non-designated subtitles are deleted and that each policy subtitle is amended to cover the designated type of asset and its non-designated equivalent. For example, 'Conservation Areas' becomes 'Conservation Areas and Areas of Special Local Character' and 'Scheduled Monuments' becomes 'Scheduled Monuments and Non-designated Archaeological Assets'. The policies for each category of designated and non-designated will have the same considerations, it will just be the weight given to the conservation of the asset that differs according to its importance. The supporting text should be similarly structured.
HE22		HE1.D, Conservation Areas and Supporting Text	<p>Conflation of townscape and heritage issues often results in development that is better than that which preceded it, being deemed beneficial to the historic environment, when in fact it is not, or it is harmful. To help counteract this, we advise strengthening the policy or supporting text for conservation areas and areas of special landscape character by setting out how beneficial effects should be measured. For example: '<i>To be considered beneficial, a proposal within a conservation area must:</i></p> <ol style="list-style-type: none"><li><i>1. Respond to Character: The design of the new building must be informed by a thorough understanding of the existing character and appearance of the conservation area.</i></li><li><i>2. Better Reveal Significance: The proposal should better reveal or reinforce the area's architectural or historic interest through a contextual and considered design response.</i></li><li><i>3. Design Quality Benchmark: The quality of the design will be assessed based on how well it responds to the existing historic and architectural character and appearance of the conservation area, rather than the poor quality of the building or space being replaced.</i></li></ol> <p><i>Replacing a negative feature with a building of a more contemporary design and in better condition, but still not in keeping with the character and appearance of the conservation area, should not be considered a heritage benefit.</i></p> <p><i>To ensure that redevelopment within conservation areas contributes positively to the area's character and significance, detailed design information is essential. Proposals should include comprehensive details on:</i></p> <ul style="list-style-type: none"><li><i>• Scale and Massing: The size, bulk and form of the new development should be in harmony with the existing buildings in the conservation area.</i></li><li><i>• Roof Form and Detailing: The design of roofs, including their shape, pitch, and materials, should be informed by the traditional forms found in the area.</i></li></ul>





			<ul style="list-style-type: none"> <li>• <i>Elevational Detailing and Features: The facades of new buildings should respond to architectural details and features that are characteristic of the conservation area.</i></li> <li>• <i>Materials: High-quality materials should be used that are in-keeping with historic material use in the area.</i></li> <li>• <i>Access and Boundary Treatments: The design of access points and boundary treatments should respect the historic layout and patterns of the conservation area.</i></li> </ul> <p><i>Outline applications, which often lack these details, may not provide sufficient information to assess the impact of a proposal. Therefore, detailed applications are encouraged to ensure that the finer design details are considered from the outset, allowing for a thorough assessment of the proposal's impact on the conservation area.</i></p> <p><i>When a proposal departs from the existing character, clear and convincing justification will be needed. It is expected that such designs are outstanding or innovative in a way that will add to the character and architectural legacy of the area.'</i></p>
HE23		HE1.D Conservation Areas	For consistency, we advise that a heritage at risk criteria is added to the conservation area policy. For example: ' <i>c. Maximise all opportunities to secure the future of conservation areas particularly those on the 'heritage at risk' register.'</i>
HE24	87	HE.E Listed Buildings and Supporting Text	As above, we suggest that the policy and supporting text sections are retitled 'Listed and Locally Listed Buildings'. Then either section could be strengthened to require that proposals ensure new development is in keeping with the significance of the building and harmonious with its surroundings and the wider character of the area. For example, they should: <ol style="list-style-type: none"> <li>1. Be of a high-quality design and sympathetic in terms of scale and form to the original structure and in the use of materials and other details to the period and style of the original structure.</li> <li>2. Factor sustainability and salvage aspects into proposals and maximise opportunities to mitigate or adapt to climate change through the retention, retrofit, re-use or adaptation, provided that this is not to the detriment of important aspects of significance.</li> <li>3. Maintain the significance of interiors and retain internal features of interest including layouts, methods and means of construction where these are important.</li> <li>4. Demonstrate that the benefits of any proposed change of use would be in keeping with the significance of the structure and wider area.</li> </ol>
HE25	88	HE1.H Archaeological Assets	We advise expanding this policy to include the following criteria: <ul style="list-style-type: none"> <li>- A presumption in favour of the preservation of regionally and locally important sites, except where the applicant can demonstrate that the benefits of development will outweigh the harm to archaeological remains.</li> </ul>





			<ul style="list-style-type: none"> <li>- A requirement that any remains of archaeological value are properly understood and, if necessary, evaluated prior to the determination of the planning application.</li> <li>- Prior to development, a programme of archaeological investigation, recording and public dissemination/engagement will be required for any archaeological remains lost.</li> </ul>
HE26	88 - 93	HE1: Historic Environment Supporting Text	For clarity, it would be useful if the supporting text included a definition (as per the NPPF) of what heritage assets are.
HE27	88 - 93	HE1: Historic Environment Supporting Text	Again, there is some great supporting text for this Policy HE1: Historic Environment. However, it might be useful to look at the structure and ensure that it all has a relevant policy hook (the climate change and public access text may be better placed in the strategic section?). Adding a short section at the end with a sentence or two on Heritage at Risk would also support the policy criteria that refer to this.
HE28	94-95	HE2: Enabling Development	Enabling development is development that is not otherwise in accordance with adopted policy. Historic England are therefore of the view that a policy on enabling development is not a necessary component of a local plan document. As per our Reg.18 response, we maintain that a local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. However, we welcome that Harrow LPA have proactively addressed our concerns with the wording of the draft Regulation 18 policy and, we do consider the wording to now be appropriate.
HE29	167 - 169	Policy HO12: Gypsy and Traveller Accommodation Needs (also relevant to site allocation GB2)	The plan established the principle of extending an existing Gypsy and Travelling site at Watling Farm Close. The adjacent Watling Farm is a Grade II listed building meaning that change to its significance as a result of setting change is a material consideration. We recommend that this is highlighted in the policy and supporting text (as well as site allocation GB2), perhaps at HO12.3.f (because the effect of change via landscaping on heritage significance will also need to be considered) or HO12.3.g (where it could be added to the list of relevant policy designations to be considered)?
HE30	177 - 184	Strategic Policy 05: Harrow and Wealdstone Opportunity Area (OA)	<p>We welcome and support Strategic Policy 05.A.d. which seeks to conserve and enhance the significance of heritage assets. However, including a sentence or two in the supporting text to explain the OAs key heritage sensitivities (the listed and scheduled Headstone Manore complex and Harrow on the Hill Conservation Areas), would be beneficial.</p> <p>For example, at para. 50.36 it could be stated that: <i>'High quality development that introduces appropriate town centre uses and are sizes that are able to contribute to the economy will be supported. As will that which seeks to conserve and enhance the significance of the nearby Harrow on the Hill conservation areas, and the heritage assets associated with it - most notably the G I church of St Mary</i></p>





			<p><i>which, along with other elements of the conservation area, is the focus of several protected views through Harrow.'</i></p> <p>Similarly, para 5.0.45 would be a suitable place to add a point about Headstone Manor. For example, '<i>Developments in these locations needs to ensure that design responds to the character. In particular, it needs to respect and integrate with <del>of the area and specifically where new development is sought to be brought forward</del> where the two distinct character areas <b>and respond sensitively to the significance of the nationally important Headstone Manor complex.</b> <del>adjoin, care needs to be taken to ensure both character areas are respected.</del></i></p>
HE31	219	Policy CI4.A.c Digital and Communications Infrastructure	We welcome the reference to heritage at Policy CI4.A.c. However, we query the wording ' <i>unacceptable impact</i> ', based on it being vague and ambiguous. We suggest revisiting it. Perhaps ' <i>where <b>harm is avoided and minimised</b></i> ' and/or ' <i>the <b>benefits outweigh the harm to</b></i> ' might be clearer?
HE32	222	Strategic Policy 07.J Green Infrastructure.	We welcome criteria J of the strategic Green Infrastructure policy but suggest that it is revisited to better capture the following points: 1) Existing green/ blue spaces are often of historic character and may qualify as heritage assets, meaning that they require management in relation to heritage significance, as well as the value of their GI function. 2) That, as per Natural England's GI guidance, a historic character-led approach (which is comparable to a design-led approach in seeking to understand context and then responding appropriately) should be used to identify locations for new green and blue infrastructure, shape designs and maximise the benefits for both the historic and natural environment.
HE33	225	Policy GI1: Green Belt and Metropolitan Open Land	We welcome the reference to the protection and enhancement of heritage assets at GI1.C.d. However, we query the preceding text ' <i>Proposals for the beneficial use of land in the Green Belt and MOL will be supported where the use would not have an inappropriate impact on the openness and permanence of the Green Belt. ...</i> '. Might the policy be clearer if it stated: ' <i>Proposals for the beneficial use of land in the Green Belt and MOL will be supported where <b>they do not harm</b> use would not have an inappropriate impact on the openness and permanence of the Green Belt. ...</i> '.
HE34	288	Chapter 11: Site Allocations, Introduction	We welcome that heritage considerations have been summarised for each Site Allocation. However, we suggest adding a caveat to the introduction which makes it clear that the considerations listed are a guide rather than definitive, and that HIAs should review the assets needing assessment using an understanding of the development/ heritage assets intervisibility (i.e. a study area informed by a zone of theoretical visibility), and the potential for effects on experiential qualities of its setting that contribute to significance. Additionally, as Harrow's APAs are being updated it would be worth caveating that the archaeological considerations listed in the Site Allocations may differ to that stated as new APAs may be identified, existing APAs may be amended and there is always some risk of unexpected archaeological remains.





HE35	p. 295 - 386	Chapter 11: Site Allocations, (throughout)	<p>We welcome that visual considerations are included in the Site Allocations tables. However, as views are not heritage assets, we would advise that 'Protected Views/Visual Amenity' are listed in a separate row. That said, any heritage assets within the protected view e.g. St Mary's Church and the Harrow on the Hill Conservation Area) should be listed in the heritage section as, in addition to being a matter of visual amenity, the view will contribute to the significance and appreciation of the asset and change to that will require consideration via both a Visual Impact Assessment and a Heritage Impact Assessment.</p> <p>We noticed that there are a few heritage assets missing from some of the site allocations and recommended that the following are added:</p> <ul style="list-style-type: none"><li>- The locally listed Byron Recreation Ground - OA12, OA13, and OA14.</li><li>- The Grade II listed Watling Farm – GB2</li><li>- Locally listed British Legion Club – O3</li><li>- Locally listed cemetery – O18</li></ul>
HE36	-	Chapter 11: Site Allocations, (throughout)	<p>We welcome that several of the site allocations highlight where the setting of heritage assets may be changed by development. However, for clarity, we suggest that this is amended to refer to their significance being affected as a result of setting change. This should help remind applicants that setting is not separate to significance.</p>
HE37	p. 295 - 386	Chapter 11: Site Allocations, (throughout)	<p>For some Site Allocations, it is stated as to whether the heritage assets are in the site, adjoining it, or nearby. This is helpful as it has implications for the development principles (e.g. assets needing retention, that the development should respond positively to, etc). For consistency and clarity, we would encourage that this is done throughout.</p>
HE38	-	Chapter 11: Site Allocations, (throughout)	<p>We welcome that some of the site allocations (e.g. OA9) clearly state that: <i>'The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site'</i> (or similar). In contrast, some site allocations (e.g. OA1-4) state that: <i>'The Site is appropriate for tall development...'</i>. We advise that the site allocations consistently state that <i>'tall buildings may be appropriate'</i> as this accords with London Plan policy D9.B, and better reflects the evidence base and the fact that the locations are untested beyond townscape considerations. For clarity, we also suggest that it is made clear where site allocations are not suitable for tall buildings.</p>
HE39	-	Chapter 11: Site Allocations, (throughout)	<p>We advise that the 'appropriate' tall building heights are specified for each site, with 'maximum' heights given in relation to any sites with significant constraints.</p>
HE40	-	Chapter 11: Site Allocations, (throughout)	<p>We welcome that development principles are provided where there is the potential for protected views to be affected. For example: <i>'The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill. New development</i></p>





			<p><i>must ensure that publicly accessible viewing opportunities are maintained.'</i></p> <p>We also support that in some cases (e.g. OA5, OA6, O7, O13) this is also done for heritage assets. However, we encourage a more consistent approach to policy being translated into development principles for all site allocations with heritage considerations. For instance, it could be consistently highlighted that:</p> <ul style="list-style-type: none"> <li>- That HIA/archaeological desk-based assessments and/or TVIA assessments will be needed.</li> <li>- That the significance of the heritage assets and/ or value of the view should be conserved, and any harm minimised and justified.</li> <li>- Were policy sets out a presumption in favour of retaining built heritage assets and/or preserving archaeological remains in situ.</li> <li>- SPDs or conservation area appraisals/management should be referred to.</li> </ul> <p>As an example: <i>'Development should seek to conserve and enhance the significance of Harrow on the Hill Conservation Area, with reference to the development guidance in the Harrow on the Hill Conservation Areas SPD.'</i></p> <p>Some further specific points are raised in the comments below for particularly sensitive site allocations.</p>
HE41	336-337	Chapter 11: Site Allocations - GB1 Royal National Orthopaedic Hospital	<p>This is a particularly sensitive site allocation in historic environment terms as it contains part of the scheduled remains of Brockley Hill Romano-British pottery and settlement, an ephemeral site that may extend beyond the scheduled boundaries. We advise that the development principles for this site are strengthened to acknowledge this archaeological sensitivity and to highlight that the application will need to be supported by an archaeological desk-based assessment. Early consultation with Historic England and the Greater London Archaeological Advisory Service should also be recommended, as a phased programme of investigation (potentially including pre-application evaluation) is likely to be required for any non-designated archaeological remains. However, the applicant should bear in mind that there is a presumption in favour of archaeological remains being preserved in-situ, and the more important the weight the greater the presumption. In line with policy HE1, the council should ensure that the development secures production of a conservation management plan (CMP) for the whole of the scheduled site and that its management is guided by this. The CMP/development should also seek to secure improved access / interpretation of the scheduled remains within the site boundary.</p> <p>We would also query whether community infrastructure money from the development could be used to help address the council owned at-risk status of the scheduled linear earthworks in Pear</p>





			Wood, just southeast of GB1. This site would benefit from a CMP, vegetation management and monitoring. It is also likely to have the potential for improved access/interpretation.
HE42		Chapter 11: Site Allocations – O5 Harrow School Estate and John Lyon School	Including APAs, conservation areas, listed buildings, and a registered park and garden, this site allocation is extremely sensitive in historic environment terms. Not just in terms of the individual assets, but their contribution to the sense of place and local identity of both Harrow and Harrow School. We therefore welcome that this site allocation is supported by a Masterplan that constitutes supplementary planning guidance. However, we note that the masterplan is now nearly ten years old, and, in light of policy changes and intervening development, we advise that it is reviewed and updated to ensure that it sets out a positive strategy for the management of the of the historic environment.
HE43		Chapter 11: Site Allocations - O13 Harrow Arts Centre	This site is adjacent to several listed and locally listed buildings. It is therefore important that proposals understand the significance of those buildings and seek to respond in a sensitive manner that conserves and, if possible, enhances that significance.
HE44		Chapter 11: Site Allocations – O16 – Koak and OA17 Kodak Administration Offices	These are both sensitive site allocations as they are for tall buildings that are located near the grade I listed Headstone Manor, which is of group value with its scheduled predecessor, its grade II* listed barn and two other grade II listed buildings. It is important economically and socially as it now operates as a museum. Had development not already been in progress in accordance with a masterplan, HIAs would have been required to inform these site allocations. As it is, we advise that the sensitivity of these sites and the need to conserve and enhance significance of the manorial complex is set out in the development principles.
HE45		Chapter 11: Site Allocations - O18 Westenholme	Located immediately adjacent to historic core of Old Church Lane Conservation Area, Site 018 is one of the most sensitive site allocations in terms of the historic environment. The site includes a late Victorian building and has a verdant character, both of which contribute positively to the significance/ character and appearance of and the site allocation. In fact, the contribution made by the site is so significant that we recommend that the Conservation Area boundary is reviewed. Given the sensitivity of the site allocation, very clear development principles should be set out to ensure that all elements contributing to the conservation area are conserved, and that any new development is very carefully designed to ensure that it responds sensitively to the character of the conservation area and is appropriate in terms of height, massing and materiality. Refencing the Old Church Conservation Area Appraisal would be beneficial. This is also a site that could be affected by review of the APAs.
HE46	-	Site Allocations in Harrow South, East, and West	These site allocations, which are for tall buildings, sit to the north of Harrow on the Hill Conservation Areas at the intersection of several protected views. Most of these views are of Harrow on the Hill Conservation Area, indicating that tall buildings could affect not only the visual amenity of the views, but also the significance (or appreciation of the significance) of the conservation areas or heritage assets them e.g. the grade I St Mary's Church which has





			<p>heritage value as a local landmark. Given the sensitivity of the conservation areas and St Mary's Church we advise that more detailed site allocation policies are set out. These could highlight the need to conserve and enhance the protected views and the significance of nearby heritage assets. They could also highlight that appropriate heights need to be informed by a full design review and that HIAs will be needed, placing a particular emphasis on the need for the cumulative assessment of effects to the conservation areas and church.</p>
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## Appendix B: Comments relating to the Harrow and Wealdstone Opportunity Area Tall Building Study (2024)

Comment Reference	Page	Section	Comment
HE47	33	Heritage	<p>We welcome the consideration of heritage in line with guidance but are concerned by its limitation to the 'built environment'. The historic and natural environment are intrinsic to one another and considering only 'built heritage' means that the assessment does not take account of registered parks and gardens (RPGs) or scheduled monuments (or their non-designated equivalents), both of which may be sensitive to tall buildings. This is particularly concerning, given the proximity of the scheduled Headstone Manor Site and the grade II Harrow Park. Fortunately, on this occasion, both assets intersect with built heritage assets – listed buildings and a conservation area respectively – meaning that the sensitivity of the area has been captured, albeit not to its full extent. However, this will not always be the case, and, in future, the methodology should be updated to include consideration of all designated and locally listed heritage assets as per the NPPF definition.</p>
HE48	38, 82, 106	Views	<p>It is repeated throughout the report that protected views '<i>will have an impact on development</i>'. The opposite is true. We therefore suggest that this is rephrased to clarify that protected views are a consideration to which development should respond appropriately, seeking to avoid and mitigate any harm.</p> <p>We would also highlight that the London Plan Characterisation and Growth Strategy (2023) includes guidance for determining where tall buildings may be appropriate (Section 4.4). This guidance states that elements of character such as conservation areas and protected views are sensitive to tall buildings and should be discounted. We therefore seek clarification on why the protected views in the opportunity area are included with the tall building zone, particularly in Harrow on the Hill, where many of the views intersect, creating a more sensitive area.</p>
HE49	77	4.1 Methodology	<p>We welcome the inclusion of conservation areas, listed buildings and locally listed buildings in the sensitivity criteria. However, as per HE46 we would highlight that it is inappropriate to only consider built heritage assets; all heritage assets should be considered (as per the London Plan Guidance Table 4.1). We would also highlight that Heritage at Risk is not a separate category of heritage asset, but a list of designated heritage assets (listed buildings, conservation areas, RPGs, etc) that are at risk. What is important to this study is the reasons <i>why</i> an asset is at risk, as it may be due to harm from inappropriate tall buildings (as is often the case for conservation areas and RPGs).</p> <p>We advise that in the future the same sized buffers are used for all designated heritage assets. This is because the buffers are arbitrary and do not represent the setting of an asset, which is significance, not distance, based. Therefore, assets of equal importance (e.g. national) should have equal (arbitrary) buffers (see also HE51 below).</p>



			(Please note that this comment is also applicable to the section 10.4 of the Harrow Characterisation and Tall Buildings Study).
HE50	79	Conservation Areas	This section states that: <i>'Site-specific analysis will be required to determine the potential impact of new tall building proposals on such heritage assets, in the form of a Townscape and Visual Impact Assessment and/or Landscape and Visual Impact Assessment.'</i> This requires amending. Landscape and Visual Impact Assessment is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource and on people's views and visual amenity. Whilst the value of heritage to both is a consideration, neither considers heritage significance as required by the NPPF. Only a heritage impact assessment (HIA) does that; it should therefore be made clear that a separate HIA is needed.
HE51	79	Conservation Areas	This section discusses the buffers applied to conservation areas and states: <i>'This buffer does not represent or define what constitutes the maximum extent of 'setting' but seeks to take into account immediate setting in this strategic, borough-wide assessment.'</i> We advise that this is amended. The setting of heritage assets is not simply its surroundings, it is those surroundings (and experiential qualities) which contribute to its significance. As such, the buffer cannot be said to take into account their <i>'immediate setting'</i> and is arbitrary. It should be made clear that the consideration of heritage assets is limited to constraints mapping and does not take account of their significance as required by policy, a separate HIA would be needed to do that as per the London Plan Characterisation and Growth Strategy (2023) para. 4.4.10, which states that: <i>'Having discounted areas of the borough where tall buildings are inappropriate for development, boroughs should assess the remaining areas (see top map in Figure 4.11) to identify where tall buildings would be detrimental; and, where relevant, to undertake an area-specific, heritage-led assessment of significance. Boroughs should determine the harm of tall buildings within these areas; and only identify areas where tall buildings could contribute positively to the character of an area. Where harm is identified, it should be documented as part of the borough's evidence base and included, or linked to, in the local plan. Information on harm will be important for development management decision-making if tall buildings are proposed in these areas.'</i>
HE52	81	Heritage at Risk	This section states: <i>'Heritage Land is defined as open land of historic value, including sites listed on the on the Register of Historic Parks and Gardens of special historic interest in England.'</i> We query the reference to 'Heritage Land' and advise that is removed as it is not a mainstream heritage term and heritage significance comprises more than just historical value. It also has no relation to heritage at risk, which covers all types of designated heritage assets not just RPGs. However, we do welcome the ensuing point regarding the sensitivity of RPGs, which supports the point made in HE47.

