



Historic England

Principal Planning Policy Officer
Planning & Building Control
Place Directorate
London Borough of Harrow
Forward Drive
Harrow HA3 8FL

By email: Local.Plan@harrow.gov.uk

Our ref: PL00795443

20.12.2024

Dear Principal Planning Officer,

Re: London Borough of Harrow – Local Plan Integrated Impact Assessment

Thank you for the opportunity to comment on the above consultation, and for the short extension to providing our feedback. 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.

As per our previous comments, we are content that most of the plans, policies and programmes relevant to the historic environment have been identified, and that an appropriate established an appropriate baseline. We are pleased to note that several of the amendments suggested by Historic England in response to the Regulation 18 consultation have been incorporated into this latest iteration of the Integrated Impact Assessment Report (IIAR). This includes amending the cultural heritage objective, widening the scope of the assessment questions, and actioning comments in relation to The Policies, Plans and Programmes (PPP) Review (IIAR section 4).

Baseline (Appendix B Section 2.9)

As before, we remain satisfied that an appropriate level of baseline information has been gathered to underpin the assessment. However, we would highlight that a few minor corrections are outstanding from our previous feedback:

- The statement that locally listed buildings are of importance due to their 'local interest' should be changed to 'local heritage significance'. For completeness, the locally listed buildings should also be mapped on Figure B.17.



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- The statement that Archaeological Priority Areas are protected because they are ‘historically beneficial’ should be amended to explain that they are of evidential value and able to further our understanding of the past.¹
- A statement regarding ‘Local Areas of Special Character’ should be made and, for completeness, they should be mapped on Figure B.17 (provided that they are confirmed to be heritage assets - see the Appendix of our Local Plan response, comment HE40).
- It would be beneficial if Figure B.17 also illustrated the assets currently on the Heritage at Risk register.
- The key to Figure B.17 should refer to ‘Registered Parks and Gardens’ not ‘Protected Parks and Gardens.’

Sustainability Issues (IIAR Section 5/ Table 5.1)

We also remain concerned that the sustainability issues relating to the historic environment have not been adequately identified and we continue to advise that this area is revisited.

Currently, the assessment states that development is a risk to the conservation of the historic environment. This is true, but it not the only risk. As highlighted in our Scoping Report response, climate change is also a key consideration. Not only do the effects of climate change (e.g. increased extreme weather, rainfall, temperatures, etc.) present a risk to the conservation of the historic environment;² climate mitigation and adaptation measures do too.³ For example, retrofitting to improve energy efficiency carries a particular risk of maladaptation for traditionally constructed buildings (i.e. buildings constructed pre-1919) because they were built using sustainable materials designed to work in different ways to modern ones.⁴

Similarly, Nature Recovery proposals (including Biodiversity Net Gain, Green Infrastructure, etc.) can potentially be harmful if the historic environment is not considered at the outset. Changes in traffic congestion, air quality, noise/light pollution and other experiential problems all also have the potential to affect the historic environment.

In addition to issues, we expect to see consideration of opportunities. The historic environment can make a significant contribution to the success of development, climate action, nature recovery, etc., and deliver wider social and economic benefits. For example, adapting historic buildings appropriately reduces carbon emissions and our reliance on fossil fuels, improves people’s living conditions, and supports the economy by creating jobs. Sustainable proposals may also provide opportunities for enhancing or better revealing the significance of the historic environment.

¹ Archaeology can inform our understanding of past people and cultures but it can also inform our understanding of climate change and people’s adaptation to that change – be it successful or not.

² For example, the drying out of waterlogged archaeological remains, historic building materials being damaged by increased fungal and plant growth and insect infestation, the drying out of clay soils causing subsidence, flooding, water ingress and damage from insufficient water goods.

³ For example, flood defences, sustainable energy generation and improving the energy efficiency of buildings.

⁴ Most modern buildings depend on impermeable barriers to control the movement of moisture and air through the building fabric, whereas, traditionally constructed buildings take up moisture from their surroundings and release it according to environmental conditions.



Performance of Heritage Policies (Section 7.4 of the IIA Report and Appendix D)

We are pleased to see that some of our previous concerns have been addressed. However, we still query whether there can be such certainty over the reported beneficial effects of the strategic policies relating to the historic environment and suggest that the scoring might better reflect where this may be uncertain. We also note that the minor positive effects for HE1 in relation to climate change are now absent and we would query this.

We also retain concerns over the minor positive effect on the historic environment as a result of GR4: Tal Buildings. Tal buildings in inappropriate locations or of inappropriate heights are one of the key threats to the historic environment and there are many located along the edge of Harrow on the Hill Conservation Areas. Also, the rationale regarding about protected views (Appendix D, p. 20), conflates visual amenity and heritage significance (see our Regulation 19 comments). We also advise that are Regulation 19 comments concerning the potential impact of basements (policy GR4A) are considered in relation to the IIA.

Assessment of site allocation policies

Due to capacity, we have not had time to review these individually. Instead, please see the comments provided in response to the Regulation 19 Consultation of the Local Plan as these cover the site allocations. We would also reiterate the point made above about demonstrating some uncertainty in the assessment findings. This is particularly relevant where there are locally listed assets in a site, as these are not afforded the same protection as designated heritage assets and may not be retained. We would also highlight that not all developments can enhance or better reveal the significance of a heritage asset, any assessment should therefore be more focused on the conservation of the asset's significance. Note also, that simply improving the surroundings of a heritage asset does not constitute an enhancement in heritage terms, unless the surroundings changed demonstrably contribute to the significance of the asset.

Conclusion

Please note that the opinion provided herein is based on the information IIA documents available at Regulation 19. For the avoidance of doubt, it does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the IIA, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]



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