

Statement of Common Ground

between

The London Borough of Harrow

and

Historic England

**In relation to the preparation of the Local Plan for the London Borough
of Harrow 2021 - 2041**

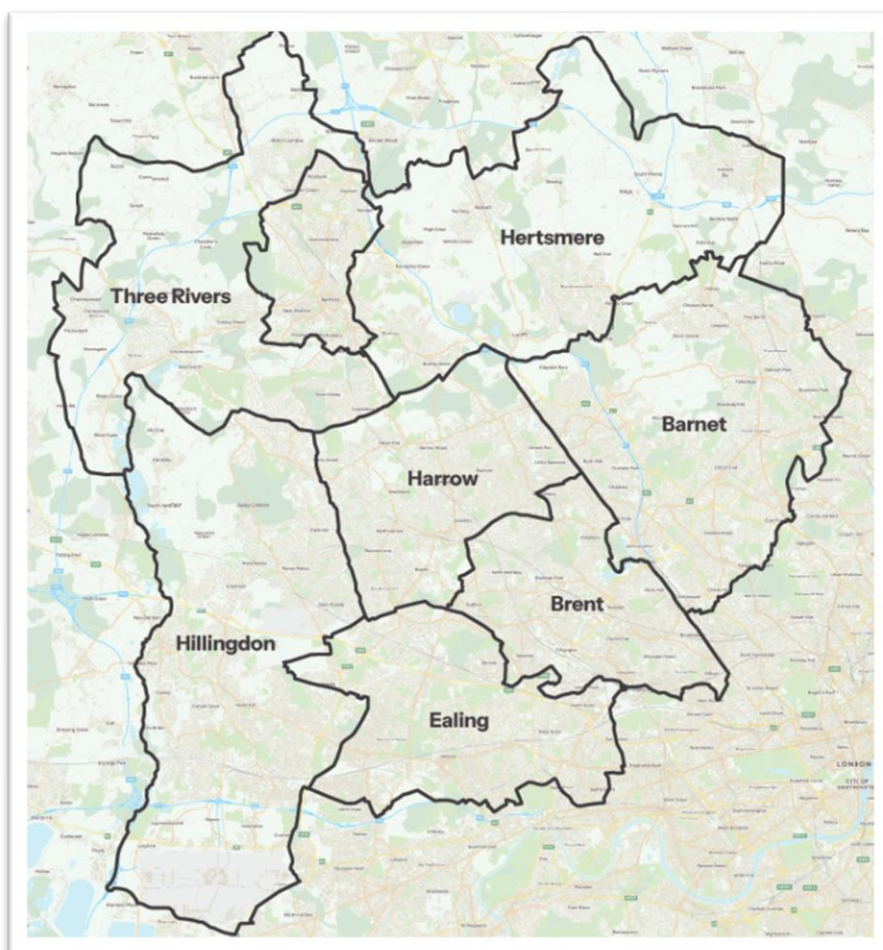
May 2025

1. Introduction

1.1 This Statement of Common Ground has been prepared by The London Borough of Harrow (“LBH”) and Historic England (HE) hereafter referred to as “the parties”. It sets out matters that are agreed between the parties in relation to Harrow’s New Local Plan 2021-2041 Proposed Submission (Regulation 19) version, November 2024 (the emerging Local Plan).

2. Borough Profile

2.1 LBH is an Outer London borough located in north west London. It borders four other London boroughs – Barnet to the east, Brent to the southeast, Ealing to the south and Hillingdon to the west and the Hertfordshire districts of Hertsmere Borough and Three Rivers District to the north. The map below shows Harrow and surrounding boroughs.



2.2 Covering a total area of 50.47 km², LBH incorporates the Metropolitan centre of Harrow, the Major Centre of Edgware (part) and the District Centres of Wealdstone, North Harrow, Pinner, Rayners Lane, South Harrow, Stanmore and parts of Burnt Oak, Kingsbury

and Kenton. The Borough also contains a number of designated Local centres and Parades.

2.3 The Borough has a resident population of approximately 261,200. Household sizes are significantly larger than the London average. 32.5% of households have 4 or more people compared to the London average of 24.1%. There are also a significantly lower proportion of lone person households (12.1%) than the London average (20.1%).

2.4 Housing density across the borough is relatively low. There are a significantly greater proportion of whole house or bungalow homes than the London average, which is reflective of a more suburban outer London Borough. There are a significantly lower proportion of flats in the borough than the London average.

2.5 Harrow's built heritage is principally found in clusters around its medieval town centres and historic landscapes. Early settlements such as Edgware, Pinner, Stanmore and Harrow on the Hill are protected by Conservation Areas and with many Statutory Listed Buildings, forming networks of assets along on key routes into and out of central London.

2.6 Landscape is intrinsic to Harrow's strategic character with protected views to and from St Mary's Church in the south and Harrow Weald in the north. It is also important at the local scale, with the mature landscape of woodland and vegetation shaping a strong sense of place in Hatch End, Clamp Hill and Bentley. 20th century Modernist and Art Deco assets also conserve and enhance local character, often acting as a counterpoint to the typical Metroland vernacular. These are typically civic and leisure uses such as London Underground stations, libraries and cinemas that are nestled into neighbourhoods.

3. The Emerging Local Plan

3.1 LBH commenced the evidence gathering process for the emerging Local Plan in 2018 and this has been on-going since this time. A document seeking views on the issues that the emerging Local Plan should cover was issued for consultation in February 2024 (Regulation 18). As part of this process, an open 'call for sites' exercise was also undertaken and the development of 'reasonable alternative' spatial options and policies prepared and analysed to enable preferred options to be identified.

3.2 Feedback from the earlier stages of the plan making process and the conclusions of all the completed evidence base documents were used to prepare the Regulation 19 version of the plan, which was published for comment on 4th November 2024 until 17th December 2024.

3.3 LBH will submit the Regulation 19 version of the plan for examination after full consideration of all representations received. The emerging Local Plan is intended to be

examined against the December 2023 NPPF, as enabled by the 2024 NPPF transitional arrangements.

4. The London Plan (March 2021)

4.1 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The current London Plan was adopted by the Mayor of London in March 2021.

4.2 All Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.

4.3 The London Plan should be read as a whole and the policies and priorities within the document have equal weight. Once adopted, policies in Harrow's Local Plan and the London Plan will form part of the development plan for Harrow alongside made neighbourhood plans and the West London Waste Plan.

4.4 LBH is required to determine planning application for new development in accordance with policies in the development plan, unless material considerations indicate otherwise.

4.5 Chapter 7 of the London Plan deals with Heritage and Culture. Policy HC1 (Heritage conservation and growth) is of particular relevance to the representations made by HE.

5. Key Strategic Matters

The parties have engaged to discuss relevant matters throughout the preparation of the emerging Local Plan.

4.2 The duty to cooperate activities between the parties are recorded in the Harrow Regulation 19 Duty to Cooperate Statement November 2024. An updated version of this document will be published at the point of submission.

4.3 The parties agree that the relevant strategic matters are:

- General conformity with the London Plan; and
- Conservation and Enhancement of Heritage Assets

General Conformity with the London Plan

5.2 The Mayor of London wrote to the Council on 16th December 2024, stating that:

'As currently drafted it is the Mayor's opinion that the draft Local Plan is in general conformity with the LP2021;

Conservation and Enhancement of Historic Assets

5.3 The emerging Local Plan seeks to protect and enhance the historic environment in Harrow through the inclusion of borough-wide policies in chapter 4 (Historic Environment). Appropriate references have also been included in subject, area and sites specific policies where necessary.

HE has submitted representations to the Council at all stages of the plan making process. The Council's consideration of and response to the representations on the Proposed Submission (Regulation 19) version of the emerging Local Plan can be found at Appendix 1.

6. Areas of Agreement

6.1 The areas of agreement between the Council and HE in relation to the preparation of the emerging Local Plan are set out below. The Schedule of Comments made by Historic England and the position reached by the parties is contained at Appendix 1 of this statement.

- The agreed matters identified in this statement are not of a strategic cross boundary nature.
- HE's primary area of interest in the emerging Local Plan is the Council's approach to the protection and enhancement of the historic environment, in accordance with current national planning policy and guidance.
- There is general support for many of the heritage related policies and principles within the emerging plan.
- HE has not raised concerns regarding legal compliance or the duty to cooperate matters. The majority of representations propose revised wording to ensure the policies and provisions are better aligned with national planning policy and guidance.
- The parties agree that the supporting evidence for the emerging Local Plan is proportionate, although Historic England has some outstanding concerns about matters of detail, as identified in Appendix 1.
- LBH has engaged effectively and on an ongoing basis with HE during the plan making process.
- The parties are satisfied that the requirements of the duty to cooperate have been met.

6.2 Historic England welcome and agree all proposed modifications and do not object where modifications have not been proposed. Nonetheless, there are a number of points that would like to be noted as set out in Appendix 2.

7. Governance Arrangements Including Future Review

7.1 The parties agree to:

- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
- To review and update this Statement of Common Ground in the light of any material change in circumstances; and
- To maintain positive principles of cooperation.

8. Signatories

8.1 We agree that this statement is an accurate representation of matters discussed and issues agreed upon.

8.2 It is agreed that these discussions have and will continue to inform the emerging Local Plan. The parties will continue to work together collaboratively to meet the requirements of duty to cooperate legislation.

	On behalf of LBH	On behalf of HE
Signed by		
Name	Viv Evans	Michelle Statton
Position	Chief Planning Officer	Historic Environment Planning Adviser
Date	22 May 2025	23 May 2025

Appendix 1 – Historic England’s representations to LB Harrow Reg 19 Consultation & Proposed Modifications

Table 1A: Historic England Representations with Proposed Modifications

Policy	Historic England Representation	LB Harrow response
Spatial Strategy	<p>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></p> <p>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></p>	<p>Noted and change agreed.</p> <p>Proposed Modification</p> <p>Amend Spatial Vision, 12th paragraph by deleting the first two sentences i.e. 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.</p>
SP01	<p>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</p>	<p>The Council considers that heritage and design are appropriately couched within the supporting text / Local Plan when read as a whole.</p> <p>Noted and agreed re incorrect cross-reference.</p>

Policy	Historic England Representation	LB Harrow response
	<p>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?</p> <p>As a point of accuracy, we'd also query if policy HE1 should be cross-referenced rather than S02?</p>	<p>Proposed modification</p> <p>Amend paragraph 2.0.7 as follows: ‘Heritage assets contribute to Harrow’s character across the borough and their significance needs to be considered as part of all development proposals (see Strategic Policy 02HE1 (Historic Environment)).’</p>
GR1	<p>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.</p>	<p>Proposed modification:</p> <p>Amend paragraph 2.1.3 as follows: ‘New development where appropriate should address the National Model Design Code, National Design Guide and London Plan Optimising Site Capacity Guidance, to ensure development opportunities are optimised and address all relevant material planning considerations, <u>including local context (such as the historic environment and protected views heritage etc).</u>’</p>
GR3	<p>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</p>	<p>Proposed Modification:</p> <p>Replace Part F with the following: <u>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.</u></p>

Policy	Historic England Representation	LB Harrow response
	<p>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:</p> <p><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></p>	
GR4	<p>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.</p> <p>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.</p>	<p>Noted and agreed.</p> <p>Proposed Modification</p> <p>Amend GR4 (E) (b) as follows: ‘The protection and preservation of <u>heritage assets</u>, local heritage views <u>protected views</u>, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and’</p>
GR4	<p>We welcome and support the requirement in para. 2.4.8 that all new tall buildings ‘<i>must be of exemplary design</i>’. In fact, we consider 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.</p>	<p>Noted and agreed as it would provide clarity and consistency between the policy and supporting text. This would also assist in general conformity with Policy D9 of the London Plan.</p> <p>Proposed modification</p> <p>Amend Part GR4E as follows:</p>

Policy	Historic England Representation	LB Harrow response
		<p>a. Would be appropriate for both the application site and the wider context, especially where a proposal may impact areas of significantly lower density and height;</p> <p>b, would be of an exemplary design;</p> <p>b c. The protection and preservation of heritage assets, protected views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and</p> <p>c d. Address matters in relation to the safety of occupiers and any mitigation required.</p>
GR4A	<p>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).</p>	<p>Noted and agreed.</p> <p>Proposed Modification</p> <p><u>Add new Para 2.4.20: Proposals for new basements within an Archaeological Priority Area (APA) should be consulted on with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment.</u></p> <p>Renumber remaining paragraphs accordingly.</p>

Policy	Historic England Representation	LB Harrow response
GR5	<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 on 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</p>	<p>Additional sentence to end of paragraph 2.5.2;</p> <p><u>Development within a viewing corridor should be supported by a Townscape Visual Impact Assessment (TVIA). Townscape and visual impacts of a development may be different to those in relation to the historic environment, therefore where proposals are within proximity to, or may have an impact on heritage assets, a separate Heritage Impact Assessment will be required.</u></p>

Policy	Historic England Representation	LB Harrow response
	<p>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: ‘...views towards Harrow on the Hill and St. Mary’s Church reinforce the historical and cultural importance of that place.’ 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>	
GR6	<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>	<p>Noted and agreed that this could be reworded as whilst large parts of Areas of Special Character include heritage assets, the designation itself is not limited to heritage considerations (nor is it a heritage designation) and therefore reference to harm could potentially be misconstrued. Impact on any heritage assets within the areas would be assessed against the relevant heritage policies in the Plan.</p> <p>Proposed modification</p> <p>Amend Part C as follows: ‘Proposals that would substantially harm have an unacceptable impact</p>

Policy	Historic England Representation	LB Harrow response
		<u>upon</u> an area of special character, or its setting, will be refused
SP02	We suggest clarifying Strategic Policy 02.A.e as per HE12. For example, ‘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. ’	<p>This proposed amendment is considered positive with respect to clarity.</p> <p>Proposed amendment:</p> <p>Amend SP02, Part Ae as follows:</p> <p>Ensuring that new development within the locally strategic protected views (as set out within the policies map) does not harm <u>views the significance of heritage assets within those views, for example to St Mary’s Church spire and on Harrow on the Hill Conservation Area and other identified assets.</u></p>
SP02	We welcome the ambition of Strategic Policy 02.C but suggest that it might be more clearly stated. For example, ‘ 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. ’	<p>This proposed amendment is considered positive with respect to clarity.</p> <p>Proposed amendment:</p> <p>Amend SP02, Part C as follows:</p> <p>Support <u>the integrated management measures to heritage assets to mitigate and adapt to climate change, of the natural and historic environment where this conserves and enhances and nature where appropriate, where these are able to be undertaken sensitively, whilst not harming the</u></p>

Policy	Historic England Representation	LB Harrow response
		<u>significance of both and optimise co-benefits, especially for climate change. the heritage asset</u>
HE1	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, ‘ <i>Conservation Areas</i> ’ becomes ‘ <i>Conservation Areas and Areas of Special Local Character</i> ’ and ‘ <i>Scheduled Monuments</i> ’ becomes ‘ <i>Scheduled Monuments and Non-designated Archaeological Assets</i> ’. 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.	<p>The representation and proposed modifications are considered to have merit and in many instances revert back to the Regulation 18 version’s approach.</p> <p>Proposed modifications: Insert new Part C to read as follows (Existing Part C to become Part D): <u>C. Proposals relating to heritage assets (either designated or non-designated) will be considered against the relevant provisions of the NPPF</u></p> <p>Proposed modification: Delete subheading: Designated Heritage Assets</p> <p>Proposed modification: Update subheadings for each separate heritage asset to combine designated assets and their undesignated equivalents:</p> <p><u>Conservation Areas and Local Areas of Special Character</u></p> <p><u>Listed Buildings and Locally Listed Buildings</u></p>

Policy	Historic England Representation	LB Harrow response
		<p><u>Scheduled Monuments and Non-Designated Archaeological Assets</u></p> <p><u>Registered Parks and Gardens (including locally listed parks and gardens); and Locally Listed Parks and Gardens</u></p> <p>Proposed modification: Amend all subheadings from D through to J (inclusive) to read; In addition to (A), and (B) and (C) above...</p> <p>Proposed modification: Delete sub-heading Non-Designated Heritage Assets and paragraph J.</p> <p>Non-Designated Heritage assets</p> <p>J. The Council will consider the effects on the significance of a non-designated heritage asset. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken.</p> <p>Policy HE1: Historic Environment - Supporting Text</p> <p>Proposed modification - Subheadings After paragraph 3.1.8 Delete subheading Designated Heritage Assets</p>

Policy	Historic England Representation	LB Harrow response
		<p>Amend the following subheadings</p> <p>Development within Conservation Areas <u>and Local Areas of Special Character</u></p> <p>Listed Buildings <u>and Locally Listed Buildings</u></p> <p>Non-Designated Heritage Assets</p> <p>Registered Parks and Gardens (Locally Listed Park and Gardens) <u>and Locally Listed Parks and Gardens</u></p> <p>Proposed modification Delete paragraph 3.1.13</p> <p>Non-designated heritage assets are locally important assets which can range across a number of assets that include locally listed buildings, locally listed parks and gardens, archaeological priority areas and Local Areas of Special Character (LASC). By reason of the difference in listing, there is a differing level of protection afforded to these assets.</p> <p>Proposed modification Relocate paragraph 3.1.14 to paragraph 3.1.11</p> <p>Proposed modification Remove erroneous reference to a paragraph at end of paragraph 3.1.13 ...particularly in respect of buildings on the heritage at risk register (see paragraph 3.25 below).</p> <p>Proposed modification</p>

Policy	Historic England Representation	LB Harrow response
		Renumber paragraphs from 3.1.11 to 3.1.22 (end of supporting text).
HE1	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> '	The representation and proposed modification are considered to have merit. Proposed modification: Add a new part (part c) to Part D as follows: <u>'Maximise all opportunities to secure the future of conservation areas particularly those on the 'heritage at risk' register'.</u>
Policy HO12	The plan is proposing extending an existing Gypsy and Travelling site at Watling Farm Close. This is adjacent to Watling Farm that is a Grade II listed building, which means it may result in a change to the significance its setting change. Recommend 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)?	Agree that the text to the policy and allocation could be updated as below: Proposed modification Amend part 3f of the Policy HO12 as follows: <u>Add to the end of Part 1: Any expansion will need to be well designed to conserve and enhance the significance of nearby Watling Farm GII Listed building and its setting.</u>
SP07	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	Comments and support noted Reference to the heritage value of green infrastructure itself could be incorporated into Part J of the policy, in

Policy	Historic England Representation	LB Harrow response
	<p>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.</p>	<p>recognition that they may themselves have heritage value.</p> <p>Suggested reference to Natural England's GI Guidance in the supporting text at paragraph 7.0.2 is considered to have merit.</p> <p>Suggested modifications</p> <p>Amend Part J of the policy as follows: 'Green spaces infrastructure, which itself may have heritage value, should support the historic environment through their its ability to enhance heritage assets and link to local history'.</p> <p>Insert the following at the end of paragraph 7.0.2: 'All development should avoid putting pressure on vulnerable ecosystems and mitigate risk through careful planning of green infrastructure, in line with Paragraph 159 of the NPPF 2023. Proposals should take account of Natural England's Green Infrastructure Guidance.'</p>
Site Allocations	<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</p>	<p>Noted.</p> <p>See modifications in individual site allocations.</p>

Policy	Historic England Representation	LB Harrow response
	<p>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"> - The locally listed Byron Recreation Ground - OA12, OA13, and OA14. - The Grade II listed Watling Farm – GB2 - Locally listed British Legion Club – O3 - Locally listed cemetery – O18 	
Site Allocations	<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>	<p>Noted.</p> <p>See modifications in individual site allocations.</p>
Site Allocations	<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</p>	<p>Noted.</p> <p>See modifications in individual site allocation</p>

Policy	Historic England Representation	LB Harrow response
	respond positively to, etc). For consistency and clarity, we would encourage that this is done throughout.	
Site Allocations	<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>	<p>Noted.</p> <p>Proposed Modification:</p> <p>Amend text in Policies OA1-4 to: ‘...tall buildings <u>may be appropriate...</u>’</p>
Site Allocations	<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 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</p>	<p>Noted.</p> <p>See modifications in individual site allocations.</p>

Policy	Historic England Representation	LB Harrow response
	<p>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"> - That HIA/archaeological desk-based assessments and/or TVIA assessments will be needed. - That the significance of the heritage assets and/ or value of the view should be conserved, and any harm minimised and justified. - Where policy sets out a presumption in favour of retaining built heritage assets and/or preserving archaeological remains in situ. - SPDs or conservation area appraisals/management should be referred to. <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>	
OA12	<p>Add references to development contributing to conserving and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.</p>	<p>Noted</p> <p>Proposed Modification(s):</p> <p><u>Planning Considerations</u> <u>Heritage: Byron Recreation Ground</u></p>

Policy	Historic England Representation	LB Harrow response
		<p>Additional Development Principle:</p> <p>Development should conserve and enhance the significance of the locally listed Byron Recreation Ground.</p>
OA13	Add references to development contributing to conserving and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.	<p>Noted</p> <p>Proposed Modification(s):</p> <p>Planning Considerations Heritage: <u>Byron Recreation Ground</u></p> <p>Additional Development Principle:</p> <p>Development should conserve and enhance the significance of the locally listed Byron Recreation Ground.</p>
OA14	Add references to development contributing to conserving and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.	<p>Noted</p> <p>Proposed Modification(s):</p> <p>Planning Considerations Heritage: <u>Byron Recreation Ground</u></p> <p>Additional Development Principle:</p>

Policy	Historic England Representation	LB Harrow response
		Development should conserve and enhance the significance of the locally listed Byron Recreation Ground.
OA16	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.	<p>Noted.</p> <p>Proposed Modifications:</p> <p><u>Heritage Planning Considerations:</u></p> <p><u>Scheduled medieval moat Grade I listed Headstone Manor</u></p> <p><u>Grade II* listed barn</u></p> <p><u>Grade II listed Former Granary at Headstone Manor and outbuilding parallel to barn to south of headstone manor)</u></p> <p>Additional Development Principle:</p> <p>Development should conserve and enhance the significance of the Headstone Manor complex.</p>
GB1	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	<p>Noted.</p> <p>Proposed modification(s):</p> <p><u>Add the following to Planning Considerations – Heritage</u></p>

Policy	Historic England Representation	LB Harrow response
	<p>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 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.</p>	<p><u>Scheduled Monument and non-designated archaeological remains</u></p> <p><u>Add a new Development principle as follows: Due to the archaeological sensitivities of this site early consultation with the Historic England and the Greater London Archaeological Advisory Service is advised. The application should be supported by an archaeological desk-based assessment and a pre-determination evaluation may also be required. As a major development a Conservation Management Plan will also be required for the scheduled monument, which will require preservation in situ (as may any other non-designated archaeological remains of equivalent significance).</u></p>
GB2	Add references to development contributing to protecting and enhancing the significance of The Grade II listed Watling Farm – GB2	<p>Noted and agreed.</p> <p>Proposed Modification:</p>

Policy	Historic England Representation	LB Harrow response
		<p>Additional Development Principal:</p> <p><u>Development shall conserve and enhance the significance of the Locally the Grade II listed Watling Farm</u></p>
O3	Add references to development contributing to conserving and enhancing the significance of Locally listed British Legion Club – O3	<p>Noted</p> <p>Proposed Modification:</p> <p>Additional Development Principal:</p> <p><u>Development should conserve and enhance the significance of the Locally listed British Legion Club.</u></p>
O18	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	<p>Noted.</p> <p>Proposed Modification:</p> <p>Amend final Development Principal:</p> <p><u>The design and layout of development on this site should conserve and enhance the positive contribution that the site makes to the significance of the adjoining Old Church Conservation area via its must be sensitive to the setting and the Locally listed cemetery and grade II* listed Church of St John the Evangelist (church and ruin) which faces the site, and</u></p>

Policy	Historic England Representation	LB Harrow response
	<p>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.</p>	<p>should ensure the protection of the adjoining boundary wall.</p> <p><u>An understanding of the significance of these assets should inform proposals from the outset (see the Old Church Conservation Area Appraisal and Stanmore & Edgware Conservation Areas SPD) and a Heritage Impact Statement should test the success of the design. The site makes a positive contribution to the character and appearance of the conservation area, primarily via the character of the Victorian building on site and the green and open space around it (i.e. its setting). Development should retain these elements and respond sensitively via high quality design to the character of the conservation area, particularly its scale, massing and grain, building detailing, access and boundary treatments, and materials. Any harm to heritage assets will require clear and convincing justification.</u></p>

Table 1B: Historic England Representations with no Proposed Change

Policy	Historic England Representation	LB Harrow response
SP01	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?	<p>The Local Plan needs to be read as a whole, and all policies apply to development in the borough where relevant. A generic reference to other plan policies after reference to individual policies would add significant text to the Local Plan with limited benefit.</p> <p>No proposed modifications</p>
GR1	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?	<p>The Tall Buildings (Building Heights) SPD referred to applies to areas outside the Harrow and Wealdstone Opportunity Area, being Harrow's suburban areas to which the paragraph relates; no amendment is required.</p> <p>No proposed modifications</p>
GR4	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	<p>This is captured in part E of the Policy and paragraph 2.4.2.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	<p>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 must not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.’</i> (Note it may 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).</p>	
GR4	<p>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.</p>	<p>The wording is considered appropriate and has been informed by experience in other boroughs and discussion with the GLA.</p> <p>No proposed modifications</p>
SP02	<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>Neither of the matters raised are considered to represent issues with the soundness of the plan.</p> <p>The Council does not wish to specify the prioritisation of a specific spatial objective in this policy, with the plan being read.</p>

Policy	Historic England Representation	LB Harrow response
	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)	Matters relating to enforcement and Article 4 Directions are not specific nor unique to heritage matters and specific referencing here would not be appropriate. No proposed modifications
SP02	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.	Noted. The Council is not seeking to duplicate the NPPF. No proposed modifications
SP02	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)	This is not required for soundness and supporting text is only required where necessary rather than needing to cover every aspect of the policy. No proposed modifications
SP02	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. 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).	This is considered repetitious of the London Plan and not essential to the soundness of the plan. It also risks dating quickly. No proposed modifications

Policy	Historic England Representation	LB Harrow response
HE1	<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.</p>	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance, either as part of character assessment and management strategies for individual / groupings of conservation areas, or design codes. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>
HE1	<p>HE.E Listed Buildings and Supporting Text</p> <p>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.</p>	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>
HE1	<p>HE1.H Archaeological Assets</p> <p>We advise expanding this policy to include the following criteria:</p> <ul style="list-style-type: none"> - 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. 	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	<ul style="list-style-type: none"> - A requirement that any remains of archaeological value are properly understood and, if necessary, evaluated prior to the determination of the planning application. <p>Prior to development, a programme of archaeological investigation, recording and public dissemination/engagement will be required for any archaeological remains lost.</p>	
HE1	For clarity, it would be useful if the supporting text included a definition (as per the NPPF) of what heritage assets are.	<p>Heritage asset is already defined in the Glossary.</p> <p>No proposed modifications</p>
HE1	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.	<p>This is not required for soundness and supporting text is only required where necessary rather than needing to cover every aspect of the policy.</p> <p>No proposed modifications</p>
HE2	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	No proposed modifications

Policy	Historic England Representation	LB Harrow response
	addressed our concerns with the wording of the draft Regulation 18 policy and, we do consider the wording to now be appropriate.	
SP05	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.	It is not necessary to add text related to heritage conservation into this policy. It is covered in other policies in the Plan. No proposed modifications
SP05	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 of the area and specifically where new development is sought to be brought forward where the two distinct character areas and respond sensitively to the significance of the nationally important Headstone Manor complex. adjoin, care needs to be taken to ensure both character areas are respected.'</i>	It is not necessary to add text related to heritage conservation into this policy. It is covered in other policies in the Plan. No proposed modifications
CI4	Policy CI4.A.c Digital and Communications Infrastructure We welcome the reference to heritage at Policy CI4.A.c. However, we query the wording 'unacceptable impact', based on it being vague and ambiguous. We suggest revisiting it. Perhaps ' <i>where harm is avoided and minimised</i> ' and/or ' <i>the benefits outweigh the harm to</i> ' might be clearer?	Criterion relates to multiple policy considerations and wording is considered appropriate as 'harm' has a particular meaning in the context of heritage assets but not the other assets listed. No proposed modifications

Policy	Historic England Representation	LB Harrow response
GI1	<p>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 they do not harm use would not have an inappropriate impact on the openness and permanence of the Green Belt...’</i></p>	<p>The Council does not agree that this makes things clearer. Criterion relates to multiple policy considerations and wording is considered appropriate as ‘harm’ has a particular meaning in the context of heritage assets but not the other assets listed.</p> <p>No proposed modifications</p>
Site Allocations	<p>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.</p>	<p>Paragraph 11.5 includes a suitable caveat to this effect. Heritage policies in the plan sets out requirements for HIAs (and paragraph 11.4 indicates the chapter does not seek to repeat every policy of the plan within the chapter.</p> <p>No proposed modifications</p>
Site Allocations	<p>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</p>	<p>The heritage policies appropriately reference APAs.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	APAs may be identified, existing APAs may be amended and there is always some risk of unexpected archaeological remains.	
Site Allocations	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>This information is available on the map accompanying GR4 Building Heights and is shown on the Policies Map.</p> <p>No proposed modifications</p>
Site Allocations	<p>Site Allocations in Harrow South, East, and West</p> <p>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 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</p>	<p>It is not the place of the site allocations text to repeat policies to such an extent suggest, but to identify key constraints. Reference will also need to be had to the relevant policies in the plan; this is reflected in paragraph 11.4.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	the cumulative assessment of effects to the conservation areas and church.	
O5	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 historic environment.	Noted. Any need to update the master plan would be influenced by whether the School's intentions have changed significantly since the master plan was adopted. No proposed modifications
O13	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.	These are referenced in the policy. No proposed modifications
Draft Integrated Impact Assessment	Baseline (Appendix B Section 2.9) Satisfied an appropriate level of baseline information has been gathered to inform IIA. Sustainability Issues (IIAR Section 5/ Table 5.1)	The IIA is a high-level appraisal of the draft Local Plan policies. Matters raised are noted with any further work being undertaken up until Examination in Public. Suggested minor amendments or points of clarity do not

Policy	Historic England Representation	LB Harrow response
	<p>Sustainability issues relating to the historic environment have not been adequately identified and should be revisited. The effects of climate change (e.g. increased extreme weather, rainfall, temperatures), adaptations and mitigations are also a risk to the conservation of the historic environment. Equally, nature recovery proposals (including BNG, Green infrastructure) can be potentially be harmful. Changes in congestion, air quality, noise/light pollution and other experiential problems can also potentially effect the historic environment.</p> <p>Performance of Heritage Policies (Section 7.4 of the IIA Report and Appendix D)</p> <p>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. The minor positive effects for HE1 in relation to climate change are now absent and we would query this.</p> <p>Concern over the minor positive effect on the historic environment as a result of GR4: Tall Buildings. Tall buildings in inappropriate locations or of inappropriate heights are one of the key threats to the historic environment.</p> <p>The rationale regarding about protected views (Appendix D, p. 20), conflates visual amenity and heritage significance. Visual impact assessments differ from heritage impact assessment as the former do not assess the effects on heritage assets</p> <p>Concern that construction of basements may have impact on archaeological remains. Basement construction in archaeological</p>	<p>amount to concerns around soundness or matters of legal compliance.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	<p>priority areas will need to undergo consultation with the Greater London Archaeological advisory service and be accompanied by a desk-based assessment</p> <p>Regulation 19 Local Plan consultation comments should be referred to in relation to sites GB1 Royal Orthopaedic Hospital, Site O5: Harrow School Estate and John Lyon School, Site 13 Harrow Arts Centre , Sites 16 and 17 : Kodak , site 18 and site allocations in Harrow south and east and west</p> <p>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. Also 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.</p> <p>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.</p>	
Other Matters – Tall Building Study	<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</p>	<p>Noted.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	<p>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>	
Other Matters – Tall Building Study	<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>	<p>Noted. The context of these statements relates to the purpose of the study, namely identifying where development / tall buildings may be appropriate in the borough and the scale of this, having regard to a range of considerations, including the impact of heritage assets on such opportunities (such assets having already being identified / fixed).</p> <p>No proposed modifications</p>
Other Matters –	<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</p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it</p>

Policy	Historic England Representation	LB Harrow response
Tall Building Study	<p>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). (Please note that this comment is also applicable to the section 10.4 of the Harrow Characterisation and Tall Buildings Study).</p>	<p>informs, where such considerations will be able to be considered on a site / proposal specific basis.</p> <p>No proposed modifications</p>
Other Matters – Tall Building Study	<p>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</p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	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.	
Other Matters – Tall Building Study	<p>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</i></p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis.</p> <p>No proposed modifications</p>

Policy	Historic England Representation	LB Harrow response
	<i>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>	
Other Matters – Tall Building Study	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.	Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis. No proposed modifications

Appendix 2: Points of note raised by Historic England for consideration by the Inspector

The Parties agree that soundness issues raised by Historic England have in large part been adequately addressed by suggested modifications to the plan contained in Table 1A. However, there are several important issues covered by Tables 1A and 1B where Historic England considers that additional adjustments to the plan would be beneficial, or where Historic England would like to clarify their position. These are therefore listed in the table below.

Policy	Historic England Representation / Note	LB Harrow response
HE1.H Archaeological assets	While we note that para. 3.1.19 to some extent deals with these comments, we continue to advise that it would be preferable to have policy text to discharge policy requirements in para. 207 and 218 of the NPPF.	The local plan is considered to be consistent with the NPPF on this matter (along with all other relevant matters) regardless of versions of the NPPF.
Site allocations	We maintain that it would be beneficial if the heritage designations for tall buildings just north of Harrow on the Hill were expanded/clarified to state ‘Harrow on the Hill Conservation areas <u>and other heritage assets in and around them (e.g. St Marys Church).</u> ’	This is a policy requirement as per Policy HE1, and all site allocations must still comply with policy. Heritage assets are identified within the policies map. St Mary’s Church is also afforded further protection by way of a number of protected views across the Borough, with many crossing through the Harrow & Wealdstone Opportunity Area / Harrow Metropolitan Town Centre.
Site allocation O13	We maintain that an additional development principle to ‘conserve and, where possible, enhance the significance of heritage assets’ would be beneficial and consistent with the amended approach to other site allocations	This is a policy requirement as per Policy HE1 – and all site allocations must still comply with policy. Heritage assets are identified within the policies map.
Tall Building Study	Whilst we do have some concerns about the approach to heritage in the tall building study, we acknowledge that paragraphs 2.4.8 and 2.4.10 of the draft Plan state that tall building sites have been identified from a townscape (suitability) perspective and that other policies and constraints must be considered. Importantly, we note that Policy GR4 Part E explicitly requires compliance with Policy D9c of the London Plan, which includes heritage considerations.’	Noted.