



**EXAMINATION OF THE HARROW LOCAL PLAN 2021-
2041**

HEARING STATEMENT

MATTER 7: DESIGN & HISTORIC ENVIRONMENT

ISSUE 13

05 June 2025

Matter 7 Design and the Historic Environment

Issue 13: Is the approach to Design and the Historic Environment contained within the Plan justified, positively prepared, consistent with national policy and in general conformity with the London Plan?

Questions:

Strategic Policy 01 – High Quality Growth

There are no direct questions raised regarding this policy however the responses below may well lead to further MIQ being issued before the hearings.

GR1: Achieving a high standard of design

13.1 Part B of the policy sets out 9-part criteria to ensuring the most efficient and optimal use of land. Is it clear that all of the criteria listed (a-i) are matters which are relevant to achieve the most efficient and optimal use of land? In what way will responding to local context in terms of building, height and mass (part a) achieve this policy objective?

13.1.1 All the criteria listed in Part B (a-i) are matters which are relevant to the achievement of the most efficient and optimal use of land. Policy GR1 has been drafted in close collaboration with Development Management colleagues and addresses general design matters that arise in most planning applications; it is a core, foundation design policy of the plan and the matters listed at Part B have been identified as being relevant to assessing development proposals to achieve the most efficient and optimal use of land.

13.1.2 Additionally, an overarching requirement of the policy is that all new development must take a design led approach (as per London Plan Policy D3 Optimising site capacity through the design-led approach) and therefore should have regard to the design elements set out in the matters set out in a – I; the relevance of each is set out below:

13.1.3 Part a will assist with efficient and optimal use of land as new development should be design-led and respond to the character and context of the area within which it is located in. By responding to the context in terms of building height and mass will assist in ensuring that new development does not underutilise a site whilst assisting in ensuring it would not be harmful to its context by being excessively tall and bulky.

13.1.4 Part b ensures that land is used optimally by ensuring the high-quality appearance of new development in maintained over a long lifetime through the use of durable materials.

- 13.1.5 Part c requires high quality landscaping to ensure that over-intensive development / built form does not occur, and that sufficient space is provided to ensure new development has an appropriate setting.
- 13.1.6 Part d ensures that new development is future proofed as much as possible with regard to climate change mitigation and adaption, and reducing resource use.
- 13.1.7 Part e is a requirement of the London plan (2021) and the Nationally Prescribed Space Standards which will have an impact on how new development will optimise a site.
- 13.1.8 Part f will assist in ensuring new development being of an appropriate scale at ground floor, assists in ensuring new development responds appropriately to the surrounding context, and influences the design of the remainder of the development.
- 13.1.9 Part g: this will be commensurate to scale of development and in satisfying these requirements may result in a change to the overall design but will ensure the site is optimises not just for built environment but also useability.
- 13.1.10 Part h: acknowledges that there are other policies and standards outside the 'Achieving a High Standard of Design' policy that contribute and influence design that will assist new development responding to its context and ensure land is optimised.
- 13.1.11 Part i; Ensuring the understanding of the location of utilities will inform the layout of new development on a site.

13.2 Are parts D and E of the policy necessary? Is it an effective policy to refer to forthcoming guidance which does not form part of the evidence base?

- 13.2.1 Part D is necessary as it provides clarity for decision makes as to how they should apply the policy and determine applications. New development that would not be in accordance with the matters listed in B and C, then permission is unlikely to be granted.
- 13.2.2 Part E is necessary as it refers to forthcoming supplementary planning guidance (SPD) which had already commenced prior to the progression of the draft new Local Plan. This included an update to the existing Residential Extension Guidance (2010) and a further document for flat conversions. The Harrow Characterisation and Tall Building Study (2021) will form much of the evidence base for each of these documents. The National Planning Policy

Framework / Guidance envisages Supplementary Planning Documents providing guidance beyond Local Plan detail, with Policy GR1 providing the policy hook for such supplementary guidance being delivered.

13.3 In what way will part F of the policy be effective?

- 13.3.1 Part F is effective as it will ensure that any new development optimises land on which it would be located. It recognises that adjoining sites can be capable of a greater level of development in their totality, and ad-hoc development may jeopardise the ability for the optimal development being realised on a wider group of sites. This may also be the case where ad hoc / unplanned development is adjacent to an allocated site which is anticipated to contribute specific development needs within the borough. If such a measure is not taken, then development may jeopardise the implementation of a site allocation making the most optimal use of the land and delivering against the design-led capacity study.

13.4 There appears to be a great deal of repetition between policy GR2 and GR3A as well as the associated supporting text. What is the justification for this approach, and will the policies be effective as a result?

- 13.4.1 This approach is justified as Policy GR2 focuses on the contribution development makes at a wider neighbourhood context, rather than site specific. Specifically, major applications are able to provide planning benefits that are further reaching than just within an application site, and how such developments are integrated into the wider context must be carefully managed. This is justified as it would be conformity with Policy GG1 of the London Plan (2021).
- 13.4.2 GR3A is effective as it is more focused on-site specific development, ensuring that new development would take into consideration principles to ensure its design would be inclusive. This would be justified as it would be consistent with Policy D5 (Inclusive Design) of the London Plan (2021).

GR2: Inclusive Neighbourhoods

13.5 What is meant by the reference to ‘with dignity’ at part A (b) of the policy and how will this be assessed?

13.5.1 The reference to ‘with dignity’ at part A (b) is to ensuring that all persons are able to enter and exit a building (including in an emergency event) independently without specifically requiring third party assistance (such as via manual mechanical devices for evacuation) and without being discernibly different - [Policy D5B(4) Inclusive Design of the London plan (2021)].

13.5.2 This will be assessed based on the type / scale of development and refer to access arrangements, ability of movement in and around buildings and also link to evacuation.

13.6 Is part B of the policy which expects development proposals to create inclusive neighbourhoods beyond site boundaries a justified and effective approach?

13.6.1 Yes. In the event that Major Schemes are adjacent to public realm there may be the opportunity to contribute either physically or financially to public realm improvements. Major developments can often provide links into the wider neighbourhood, which may require the need for infrastructure as envisioned by paragraph 3.5.7 of Policy D9 (inclusive design) of the London plan (2021). The policy is also consistent with London Plan Policy T2: Healthy Streets, which seeks to facilitate inclusivity.

13.6.2 Part B is a justified and effective approach.

13.7 What is meant by a ‘lifetime neighbourhood’ as set out at Part D of the policy? Given the Individual policies concerning heritage assets, is part D of the policy necessary for effectiveness?

13.7.1 The Council is open to amending this term to ‘Inclusive Neighbourhood’ to remain consistent with terminology within the policy.

13.7.2 Part D is included within this policy to recognise that sensitive adaptations to provide inclusive access to publicly accessible historic buildings and environments (which are often landmarks within a neighbourhood) will promote inclusive neighbourhoods.

GR3 Public Realm and Connecting Places

13.8 Is part E of the policy, which is specific to the preparation of a masterplan for Harrow Town Centre a justified and effective part of the policy?

- 13.8.1 Part E of the policy is justified and effective as Harrow Metropolitan Town Centre is the most heavily trafficked area within the borough and therefore the most heavily trafficked public realm. The Council has committed to the delivery of a Harrow Town Centre Masterplan which is intended to be adopted as a Supplementary Planning Document, which will assist in shaping a range of development opportunities, with public realm and connectivity being two key elements of this. The National Planning Policy Framework / Guidance envisages Supplementary Planning Documents providing guidance beyond Local Plan detail. Part E is therefore justified given the role and nature of Harrow Town Centre and effective as the master plan will be adopted as an SPD and provide area specific guidance to Parts A-D of the policy.

GR3B Safety, Security and Resilience to Hazards

13.9 The supporting text notes that Harrow is one of the safest boroughs. Nevertheless, the policy sets out an 11-part policy concerning the matter. Furthermore, part C of the policy merely repeats Part B of the Building Regulations. What is the justification for this approach? It appears that the policy duplicates much of what is contained within policies GR3 A (b) (d), GR3A (D) as well as supporting text 2.3.18 – 2.3.23.

- 13.9.1 Policy GR3B is justified as the plan period is to 2041 and it is necessary to ensure that new development takes consideration of safety, security and resilience matters that may become more relevant over that period.
- 13.9.2 The 11-part policy is split into three parts, with Part A specific to public realm development, Part B specific to new build development and including change of use, and lastly Part C to reference Fire Safety. Only the relevant part / criteria would be applied, depending on the nature of the development.
- 13.9.3 Part C provides clarity to decision makers as to what matters are to be considered. Supporting paragraph 2.3.40 refers decisions makers / applicants to Part B of the Building Regulations and where to get further suitably qualified advice.
- 13.9.4 The policy does not duplicate policies GR3 A (b) (d), GR3A (D) as well as supporting text 2.3.18 – 2.3.23.

- 13.9.5 GR3A (b) refers to the Mayor's Healthy Streets for London indicators, however Policy GR3B provides clarity for decision makers that new public realm must seek to incorporate satisfactory counter-terrorism measures.
- 13.9.6 GR3A (d) refers to an area adapting to being in use both during night and day times. However, GR3B provides clarity in relation to how a decision maker should interpret this policy in relation to what mitigation measures must be considered as part of new public realm and development regarding counter terrorism matters.
- 13.9.7 GR3A (D) relates specifically to Secure by Design principles, however Policy GR3B refers to Counter terrorism measures which is more specific than Secure by Design. Secure by Design and Counter-Terrorism are considered as separate matters by the Metropolitan Police.
- 13.9.8 Supporting text 2.3.18 – 2.3.23 relates to violence against women and ensuring a safe environment for a group of society that is disproportionality affected. Policy GR3B provides clarity in relation to how a decision maker should interpret this policy in relation to what mitigation measures must be considered as part of new public realm and development regarding counter terrorism matters.
- 13.9.9 The identified policies are applied in different contexts and serve different purposes.

GR4 Building Heights

- 13.10 This policy defines a tall buildings zone within the Harrow & Wealdstone Opportunity Area. The evidence base to support this approach is EBDH03 Harrow Characterisation and Tall Buildings Study, 2021.**
- 13.11 Does policy GR4 which addresses tall buildings align with the steps identified within the London Plan at page142/143?**
 - 13.11.1 Yes, The Mayor of London has advised that he considers the Plan to be in General Conformity with the London plan (2021).
 - 13.11.2 The evidence base (EBDH03 Harrow Characterisation and Tall Buildings Study, and EBDH01 Harrow and Wealdstone Opportunity Area Tall Buildings Study) undertook the necessary sieving process exercise (at a borough level and then opportunity area) to determine where designated tall building zones could be located within the borough, and then determined appropriate heights for the respective designated zones. A local tall building definition is provided, and

the designated tall building zones have been represented spatially on a map (CSDO1, page 57 and Policies Map (CSDO2b).

13.11.3 Part E addressed Design Considerations, which also refers to part C of Policy D9 of the London Plan (2021).

13.11.4 Policy GR4 sets out the local requirements for tall buildings (informed by the evidence base), following the structure set by Policy D9 of the London Plan (i.e. define 'tall', identify locations and appropriate heights, and assess impacts (design).

13.12 What is the purpose of the designated tall buildings zones map on page 57 of the Plan and the associated text? Does this replicate what is contained on the policies map?

13.12.1 Yes, this will be replicated within the interactive and PDF version of the adopted policies map.

13.13 The map purports to identify the areas appropriate for tall buildings. However, the text which accompanies the map indicates some but, not all, buildings could be tall in these areas. It goes on to state that only a minority should reach the maximum appropriate height. Please could the Council explain the rationale behind this text and how it relates to policy D9 of the London Plan which seeks to ensure that Boroughs identify appropriate locations for tall buildings.

13.13.1 The rationale for the wording accompanying the map is as follows:

- The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) (EBDH01) sets out the areas appropriate for tall buildings, and what the heights are considered to be tall in each of those zones.
- However, the study made it clear that buildings that meet the respective appropriate building heights may not be appropriate across the entire zone for design reasons.
- Proposals will therefore need to arrange building across each of the zones appropriately to address wider considerations of townscape, context and edges, with one tall building likely to be appropriate with any other buildings subordinate in height to that.
- Section 5.6 - 5.14 of the study depicts how the heights within each area may respond to these issues. This is of particular relevant given the composition of the Harrow & Wealdstone Opportunity Area and how it relates to the wider area.

13.13.2 The map and wording are considered to be in general conformity with Policy D9 as the map clearly articulates appropriate locations for tall buildings; the wording simply provides a design narrative with respect to the arrangement of buildings / heights within those identified areas.

13.13.3 The Mayor of London has confirmed that he considers the policy to be in general conformity with Policy D9, with several iterations of the policy having been discussed with GLA officers throughout the preparation of the Plan.

13.14 Is it clear how a decision maker should react to the designations proposed and the policy wording?

13.14.1 Yes. The designation sets out what a tall building definition is and what the appropriate building height within each designation would be. Policy GR4E(a) requires any new development to ensure it is appropriate within the application site and the wider area. This would require any new development to ensure that a tall building would be appropriate within its site and respond to other development that may exist. This would also be the case in relation to responding to areas outside of a designated tall building zone, where a tall building directly adjacent to much lower density may not be appropriate.

13.15 Please could the Council check how the tall building heights are identified on the policies map – Historic England have raised concerns that appropriate tall building heights should be specified for each site. The Council have stated that this information is available on the map accompanying GR4 building heights and is shown on the policies map. On the hard copy printed map provided, these are shown as ‘up to’ 8/12/15/18 storeys in height. What is the justification for the approach adopted and is this supported by the evidence base?

13.15.1 The tall building definition for Harrow is set out in Policy GR4A, and the designated tall building zones set out what an appropriate height would be within that zone. This approach is in general conformity with the London Plan (2021), which only requires that ‘locations and appropriate tall building heights’ are shown on maps.

13.15.2 This approach is supported by the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) (EBDH01), which identifies tall building zones and what could be considered an appropriate height within each site.

13.16 Is part F of the policy justified?

13.16.1 Yes, it is justified given the nature of the Opportunity Area and the designated tall buildings zones, the context can change sharply between those areas appropriate for tall buildings and those that are not. Part F makes it clear that buildings that are located within a designated tall building zone must still be appropriately designed and be found acceptable when considered against the development plan. This is consistent with paragraph 3.9.3 of Policy D9 of the London Plan (2021).

13.16.2 The evidence base EBDH01 (Harrow & Wealdstone Opportunity Area Tall Building Study 2024) (Section 5.4) sets out that in most designated tall building zones some, but not all, future building should be tall within these zones. Of the tall buildings, only a minority should reach the maximum appropriate height indicated. All other development must respond to that. In some instances that may mean that a tall building in some parts of a tall building zone may not be appropriate.

13.17 Paragraph 2.4.8 – 2.4.12 appear to duplicate the policy considerations at part E of the policy. Is this text as currently drafted effective?

13.17.1 Paragraphs 2.4.8 – 2.4.12 expand on the design considerations set out under Part E, providing further detail and clarity for applicants and decision makers with regard to the specific matters raised.

13.18 The policy purports to address building heights however primarily deals with locations where tall buildings would be appropriate. Should the policy be renamed to focus on tall buildings only, or should the policy wording be expanded to provide a policy framework for building heights outside of tall building zones? The supporting text at paragraph 2.4.6 and 2.4.7 references this point but is insufficiently clear as currently drafted.

13.18.1 Policy GR4 is in general conformity with the London Plan (2021), by providing a definition of a tall building, identifying appropriate locations and heights within the policies maps.

13.18.2 Outside of the HWOA there are no designated tall building zones. In the event a tall building were to be proposed outside of a designated tall building zone, any assessment would be required against Policy D9(C) (Tall buildings) of the London Plan (2021) and also Part E of this policy. The Council has published the Tall Buildings ('Building Heights') Supplementary Planning Document (2023) (ODS08) which also provides guidance for new development outside of the HWOA.

GR4A Basement Development**13.19 Is the policy as drafted justified and effective?**

- 13.19.1 Yes, the policy is considered justified and effective. It has been developed with consultation with Development Management colleagues to assist in addressing matters that have arisen by way of planning applications for basements. The policy is therefore considered to be effective in managing the specific impacts of such developments.
- 13.19.2 The policy assists in highlighting the key considerations for basement development that require planning permission (not permitted development). Specifically, it seeks to ensure that any new basement development would be appropriate within its context and not result in unacceptable harm.

GR5 View Management**13.20 Is part G of the policy clear regarding opportunities to create local views?**

- 13.20.1 The Council has suggested a minor modification (LBH/ED9) to Policy GR5 Part G: 'Opportunities to create new local views and vistas should be ~~maximised~~ secured through the design and layout of new development.'
- 13.20.2 Yes, supporting text at paragraph 2.5.3 provides additional guidance to open up new local views or vistas, or where new development can be designed to contribute to this.

13.21 Is this reference at part E specific to the protected views identified at appendix 3 of the Plan?

- 13.21.1 No. Part E forms part of the requirements for consideration of all development and how it relates if located within a protected viewing corridor. Regardless of what view is protected, the policy provides a consideration for all new development within the view corridor. This approach is consistent with Policy HC4 of the London Plan (2021).

13.22 In what way does the policy accord with policy HC4 (London Views Management Framework) of the London plan?

- 13.22.1 This Policy accords with policy HC4 (London Views Management Framework) as it has been informed by the Harrow Views Management Guidance (2024) (EBDH02), which used a methodology based on Policies HC3 and HC4 of the

London Plan (2021) and the London Views Management Framework (LVMF, 2012). The evidence base identifies protected views across the Borough. In response to the identified protected views, the policy sets out new development should be considered to ensure any view would not be harmed, and where possible should make a positive contribution to the view. The Policy covers the content required as set out by Policy HC4 of the London Plan (2021).

13.22.2 The Mayor of London has advised general conformity with the London Plan (2021).

13.23 In more general terms, is the policy wording as drafted effective or does it repeat the requirements of policy HC4 outlined above?

13.23.1 Yes, the wording of the policy is effective as it predominantly refers to Harrow specific protected viewing corridors and landmarks and as such the evidence base that underpins these constraints (EBDH02).

13.24 Representors have raised concerns that the policy wording as drafted goes beyond the scope of policy HC4 and seeks to impose a duty to positively enhance views. Are these concerns justified?

13.24.1 No, these concerns are unjustified. Policy GR5C seeks that *‘Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements’*.

13.24.2 As many of the views are towards Harrow on the Hill / statutory listed St Mary’s Church and the Conservation Areas on the Hill, enhancement where possible is considered to assist the LPA meeting its statutory obligations under the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve and enhance conservation areas i.e. s71. However, the policy recognises that this may not always be possible, and therefore the proposed amendment suggested for GR5G (as set out in 13.20 above) ensures sufficient flexibility within the drafting of the policy to not frustrate delivery.

Policy GR6 Areas of Special Character

13.25 How do the Council understand the relationship between policy GR1 and GR6? Given the level of detail contained within policy GR1 is GR6 merely duplicating these requirements?

- 13.25.1 GR1 and GR6 serve different purposes. GR1 is a general development policy relevant for all new development regardless of any specific designations or not and is a more immediate / building / site specific policy application. GR6 relates to the areas of the borough that are designated as an Area of Special Character, where new development must address the specific policy matters under that policy to ensure such areas' special character (which includes environmental, architectural, historic and landscape features) is preserved or enhanced. Policy GR6 is more of a policy that addresses landscape and wider character considerations (than GR1 would).

13.26 Where is the evidence base to support the designation of an area of special character? There is no assessment provided to support such a destination within the evidence base submitted including EBDH03 the Characterisation and Tall Buildings Study. Has the policy as drafted been positively prepared?

- 13.26.1 There is no specific assessment relating to Areas of Special Character, but their designation is considered justified.
- 13.26.2 The areas have been carried over from the existing local plan and before that the Harrow Borough Local Plan (1986). The Areas of Special Character have therefore been an important asset within the borough that have been valued across multiple local plans. Development has been managed to preserve or enhance the environmental, architectural, historic and landscape features of these elevated parts of the borough, as they have played a significant role in assisting in how development has shaped the borough.
- 13.26.3 The characteristics of the Areas of Special Character in terms of their environmental, architectural, historic and landscape (either individually or collectively) significance to the Borough, remain valid and equally important today.
- 13.26.4 The Harrow Authority's Monitoring Reports confirm there has been only one (retrospective) planning application permitted within an Area of Special Character (Harrow on the Hill) since the adoption of the Harrow Core Strategy 2012 that was considered harmful. This application was refused by the Council, however, was allowed at appeal. Therefore, it is concluded that the

values associated with these areas have not been eroded over time and still hold the same values and level of importance to the borough.

13.26.5 Whilst there is not a specific evidence base submitted to underpin the Areas of Special Character, it is clear that they have been a long-accepted matter of strategic value within Harrow. Each plan has sought to manage development within the areas to ensure the special character of each area is preserved. This is clear from the annual monitoring noted above. Paragraph 31 of the NPPF (2023) whilst noting that policies should be underpinned by relevant and up-to-date evidence, it should be adequate and proportionate (among other matters). Given the monitoring that has been undertaken over the current local plan period, and that limited (only one) application was permitted (at appeal) for a scheme the Council considered inappropriate, then the quality of the Areas of Special Character has not been eroded. For this reason, undertaking further specific evidence base work on this matter would not be proportionate. Similarly, the areas' underlying characteristics of being elevated, open and heavily treed have remained intact.

13.26.6 Policy GR6 is positively prepared as it manages development within elevated areas of the Borough that contributes to its character, ensuring that new development would not substantially harm the area or its setting. Policy GR6 would accord with the framework as set out above.

13.27 How does the Area of Special Character differ from a Conservation Area designation?

13.27.1 The Area of Special Character designation differs from a Conservation Area designation as Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. Specifically for Harrow, these include areas that are landscapes of higher elevation that are able to be viewed from the urban and suburban areas. Areas of Special Character may have some heritage assets located within it, but it is the wider matter of appreciating the higher landforms within the borough that must also be considered.

13.27.2 A Conservation Area is set because of an area's special architectural or historical interest as set out in Paragraph 197 NPPF 2023.

13.27.3 Areas of Special Character are therefore much wider with respect to their character and features (topography, landscape, long-distance views, urban / non-urban structure, and heritage), compared to a conservation area, which is focused on architectural or historic interest.

13.28 Are any of the areas of special character also covered by Conservation Areas? The Council is requested to produce an overall map extract which demonstrates any areas of duplication.

13.28.1 Yes, there is some overlap of conservation areas into Areas of Special Character.

13.28.2 The requested information is attached as Appendix 1 (as a separate document).

13.29 In what way is the criteria identified at parts A and C of the policy consistent with National Policy?

13.29.1 Part A criteria (a-c) are consistent with Paragraph 135c of the NPPF 2023, as collectively the criteria seek to ensure that new development would be sympathetic within the designated Areas of Special Character. Specifically in relation to considering applications in relation to local character, history and landscape setting.

13.29.2 Part C is consistent with Paragraph 135c of the NPPF 2023, as it sets out that where new development is not sympathetic to an Area of Special Character then they would be refused. Paragraph 180(a) of the NPPF (2023) sets out that new planning policies and decisions should seek to protect and enhance a valued landscape.

13.29.3 Policy GR6 is consistent with Para 203 of the NPPF 2023, as it seeks to ensure new development would make a positive contribution to local character and distinctiveness.

13.29.4 Consultation with Hertsmere Borough Council raised the issue that an Area of Special Character within LB Harrow also adjoins an identified Landscape Character Area within Hertsmere Borough Council. On a request from Hertsmere Borough Council (Rep 204) supporting text paragraph 2.6.3 was amended to include reference to this to ensure any development take consideration of the Landscape Character in Hertsmere.

13.30 In what way is the proposed designation consistent with the London Plan?

13.30.1 London Plan Policy D1 London's form, character and capacity for growth indicates that urban form, topography and views and landmarks are key elements of defining an area's character and understanding its capacity for

growth. As evidenced above, the areas of special character are distinctive to the rest of the borough with respect to these matters and form an important part of the borough's local distinctiveness. The designation is therefore consistent with the London Plan, and it is justified to include a local policy response to this.

Other Matters

13.31 Policies GR7, GR8 and GR9 deal with external lighting, shopfront and forecourts and outdoor advertisements, digital displays and hoardings respectively. The policies are lengthy, with policy GR8 having a 15-part policy and GR9 13 parts. Is it an effective approach to have all of these matters covered by individual policies? What do the individual policies add beyond policy GR1: Achieving a high standard of design?

- 13.31.1 The inclusion of the three policies is an effective approach to covering the specific matters relevant policies. Policy GR7 is an individual policy that relates to external lighting across a range of development typologies, which may include developments set out in Policies GR8 and GR9. Policy GR7 is effective as each policy relates to a specific development which may require consideration against only one of the listed policies. However, in some instances new development may require consideration against all three.
- 13.31.2 Policy GR8 has been drafted in close consultation with Development Management colleagues, where current Local Plan Policy did not adequately provide the necessary policy consideration to secure high quality shopfront developments. Providing a more detailed policy will assist in this issue. Furthermore, the current local plan is silent on outdoor seating on forecourts / pedestrian footpaths. Policy GR8 is therefore effective.
- 13.31.3 Policy GR9 has been drafted in close consultation with Development Management colleagues, where current Local Plan Policy (2013) provided a successful policy consideration generally. However, the existing policy did not provide policy in relation to WiFi, telecommunication or electric car charging stations, which Policy GR9 seeks to address to ensure that it remains effective by responding to changes in these types of development.
- 13.31.4 As set out above, the policies provide specifics in relation to the relevant development typology or element (if part of a more substantial development proposal). Policy GR1 as a catch all policy for such development typologies would not be effective in capturing the specific potential impacts of such developments.

13.32 Within policy GR9, what is the justification for part A (e) and the requirement for proposals to contribute to the safety of the environment for pedestrians, cyclists and drivers? How will this be assessed?

- 13.32.1 The justification is to assist in ensuring Highway Safety. New advertisements, digital displays and hoardings should not result in clutter or signs that would impede sightlines / manoeuvrability for either highways users or those cycling, walking and those who are less ambulant. Any new development should therefore contribute to a safe highway for all users and will be assessed on site with consideration given to other signage in the area and movement patterns. The Highways Authority may also provide comment on applications that may have an impact on the highway network.

Policy HE1 The Historic Environment

13.33 Is the paragraph relating to Conservation Areas as set out at part D of the policy consistent with the duty identified at Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 which refers to paying special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

- 13.33.1 Yes. Both elements of HE1D contribute to the enhancement of character of Conservation Areas when redeveloping sites that may have a negative impact upon the area (thereby enhancing it) or restoring lost / introducing new features that enhance a view. Part A requires all new proposals to secure the preservation, conservation or enhancement of a heritage asset's significance.
- 13.33.2 Historic England have no objection to the Local Plan policies, including Policy HE1 (Heritage Assets) Statement of Common Ground (LBH/ED12).

13.34 Is the policy as drafted consistent with national policy, particularly in relation to the reference to sustainable development within part A of the policy?

- 13.34.1 The policy as drafted is consistent with national policy. Part A reference is in relation to sustainable enjoyment rather than sustainable development. Part A primarily seeks to secure preservation, conservation or enhancement of a heritage asset's significance. Sustainable enjoyment allows for the ongoing and accessibility of an asset which includes the preservation, conservation or enhancement of the asset.

- 13.34.2 Historic England have no objection to the Local Plan policies, including Policy HE1 (Heritage Assets) Statement of Common Ground (LBH/ED12).

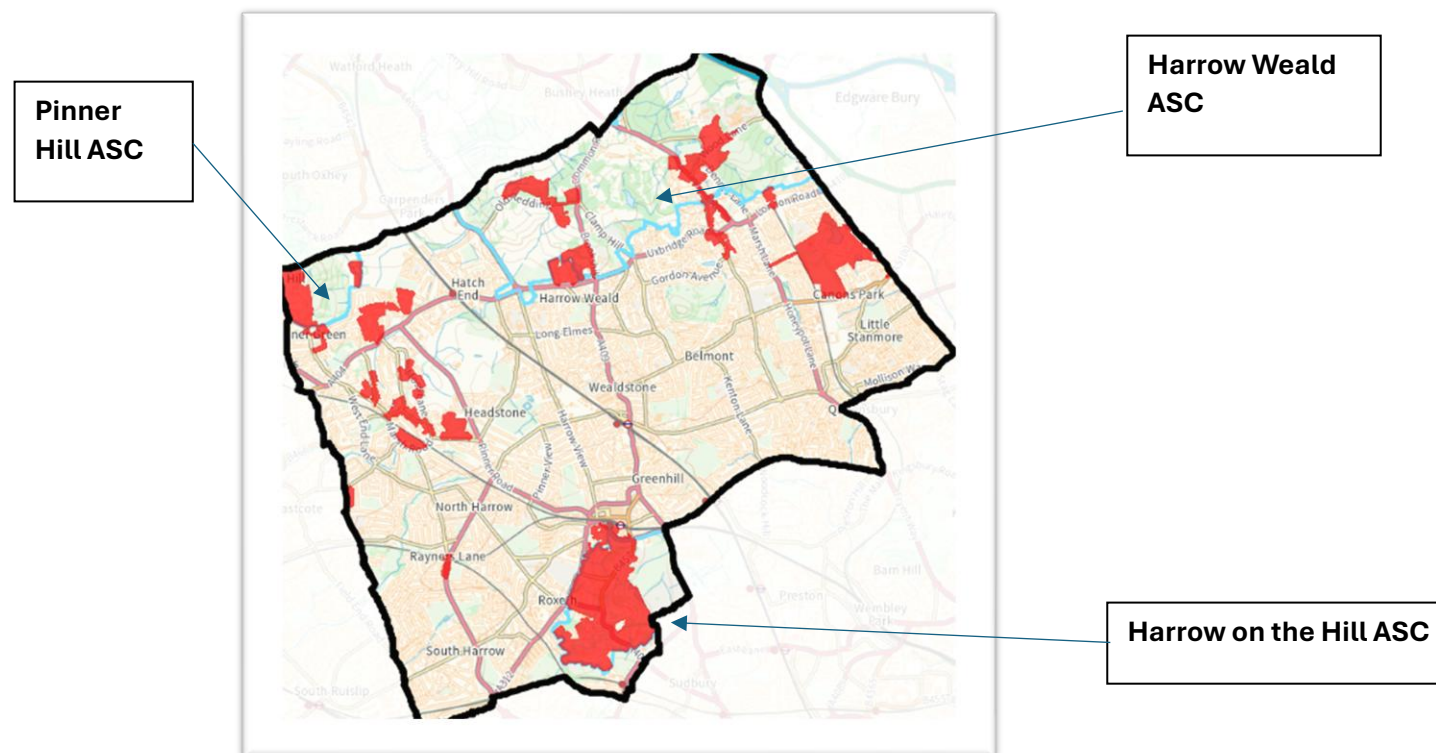
13.35 Is part H of the policy effective?

- 13.35.1 Yes, the Policy must be read in conjunction with Part A and B of HE1 to ensure that the appropriate assessment is undertaken. However, Part H makes specific note that Archaeological Priority Areas may be subject to change as further investigation is undertaken across the borough. These will be updated and set out spatially within Local Plan Policies Maps.
- 13.35.2 Part H, when read in conjunction with Part (A) and (B) is effective.

Appendix 1: Areas of Special Character and Conservation Areas

The following mapping demonstrates spatially the locations of the three Areas of Special Character across the Borough, and the interrelationship with Conservation Areas that are partially located within them.

Map 1: Borough wide map showing all Areas of Special Character and Conservation Areas.



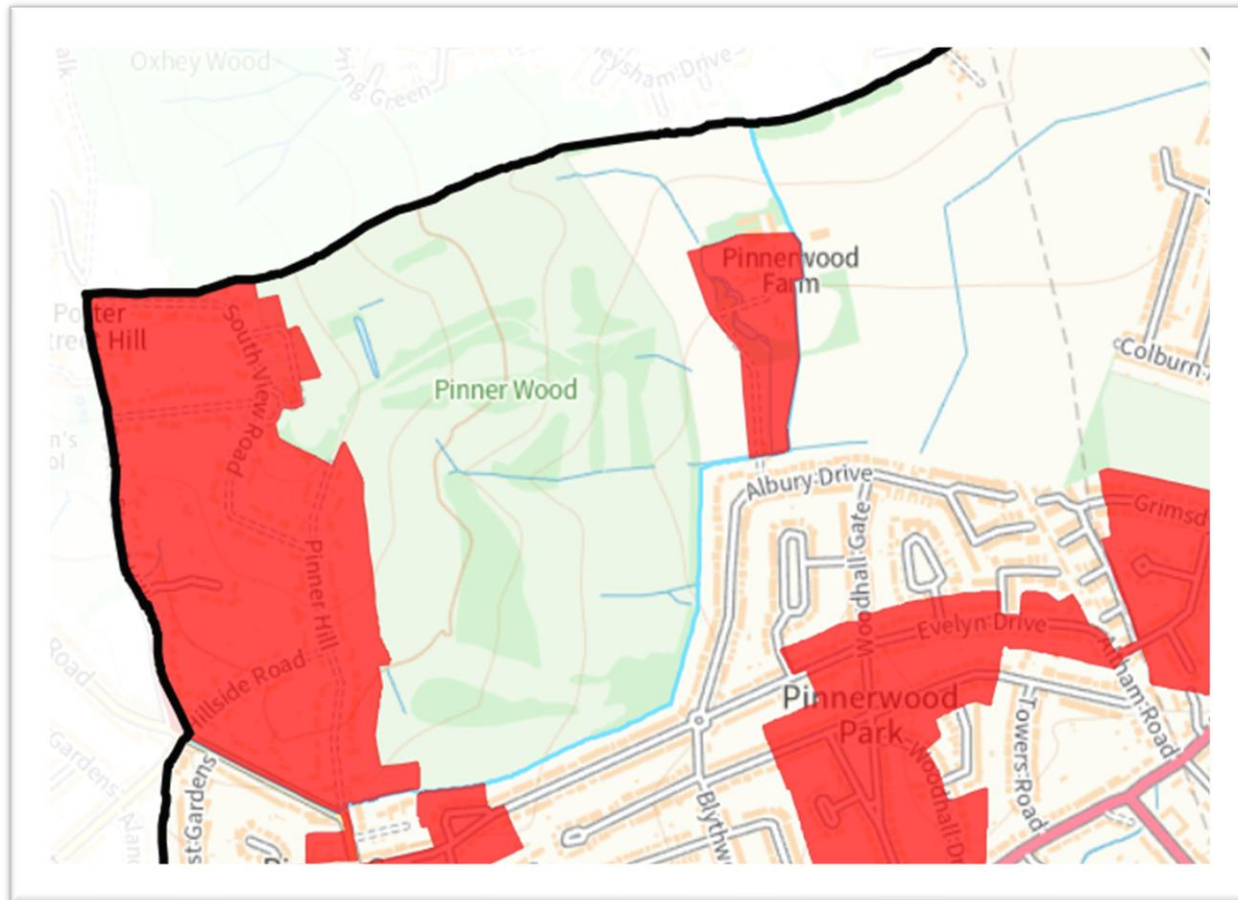
Key:

Blue boundary layer – All Areas of Special Character

Red Layer – All Conservation Areas

Black boundary layer – Borough boundary

Map 2: North-West of Borough: Pinner Hill Area of Special Character



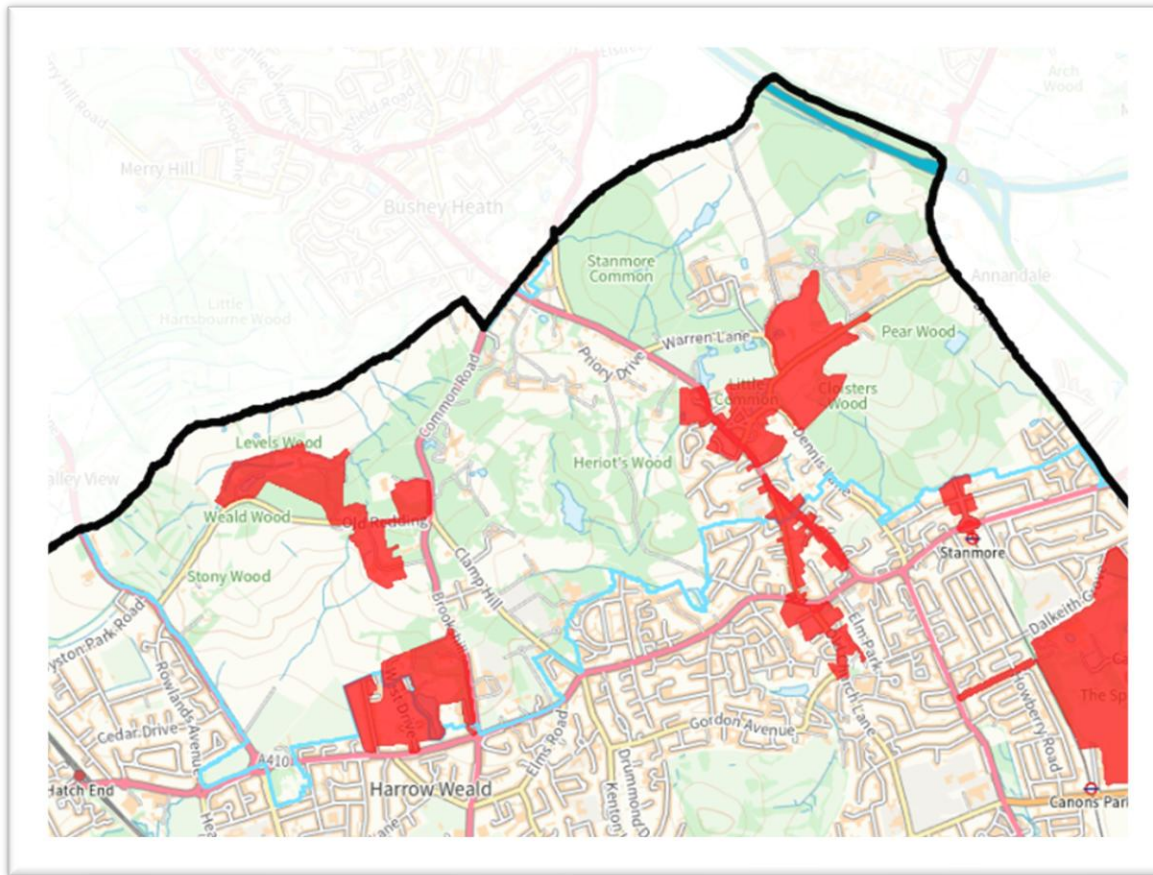
Key:

Blue boundary layer – Area of Special Character

Red Layer – Conservation Areas

Black boundary layer – Borough boundary

Map 3: North East of Borough: Harrow Weald Area of Special Character



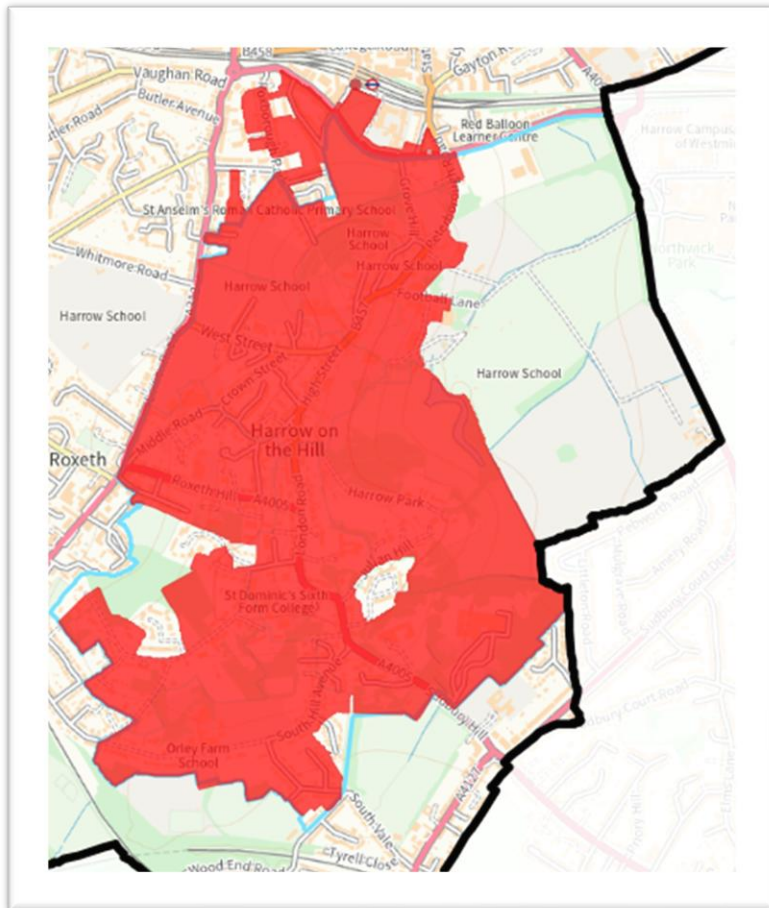
Key:

Blue boundary layer – Area of Special Character

Red Layer – Conservation Areas

Black boundary layer – Borough boundary

Map 4: Harrow on the Hill Area of Special Character



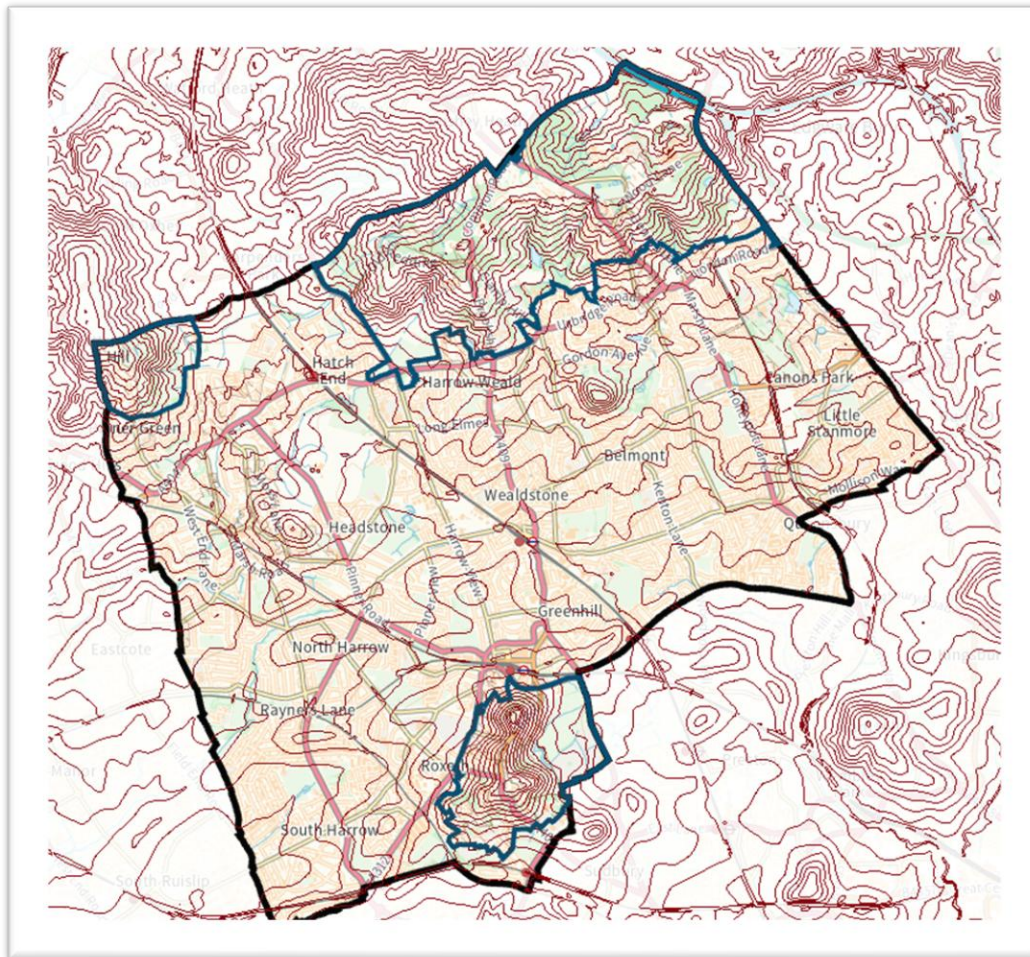
Key:

Blue boundary layer – Area of Special Character

Red Layer – Conservation Areas

Black boundary layer – Borough boundary

Map 5: Borough wide map showing Areas of Special Character and 5m contours



Key:

Dark blue boundary layer – Areas of Special Character

Black boundary layer – Borough boundary