



Examination of Harrow Local Plan

Matter 6, Issue 12, Question 12.10

Regulation 19 Representation No. 217a

Historic England, Hearing Statement

June 2025

1. Introduction

- 1.1. This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan and our Statement of Common Ground with the Council dated May 2025.
- 1.2. All National Planning Policy Framework (NPPF) references are to the December 2023 version.

2. Matter 6: Site Allocations including the Harrow and Wealdstone Opportunity Area

Issue 12: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan?

All Site Allocations

Q12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.

- 2.1. Historic England and the Council have worked proactively together to address concerns raised at Regulation 19. Consequently, we have agreed a series of suggested modifications (see our Statement of Common Ground with the Council) intended to ensure that the plan is sound by setting out a clear and effective *positive strategy* for heritage assets (NPPF paragraph 196) potentially affected by development of the sites. To this end, the modifications seek to ensure that key heritage assets that could be affected by development are identified, and that there are some principles to guide how harm to their significance can be avoided or minimised. As a result of this, Historic England has no outstanding substantial concerns.
- 2.2. Nonetheless, as per our Statement of Common Ground, we would ideally like to see the heritage assets that could be potentially affected by the tall buildings in Harrow Town Centre (West, East and South) listed out, or at least expanded, to highlight that it is not just the Harrow on the Hill Conservation Areas that may be affected as a result of development. For example, 'Harrow on the Hill Conservation areas and other heritage assets in and around them (e.g. the grade I St Marys Church).' For consistency, we would also prefer that O13 include a development principle to 'conserve and, where possible, enhance the significance of heritage assets'.