



Historic England

**Examination of Harrow Local Plan**

**Matter 7, Issue 13,  
Questions 13.1, 13.13, 13.15, 13.17,  
13.19, 13.33, 13.34 and 13.35**

**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, along with our Statement of Common Ground (SoCG) with the Council dated May 2025.
- 1.2. All National Planning Policy Framework (NPPF) references are to the December 2023 version.

## 2. 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?***

### **GR1: Achieving a high standard of design**

***Q13.1 Part B of the policy sets out a 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?***

- 2.1. Historic England supports Policy GR1: Achieving a High Standard of Design and its requirement at part B to optimise land use via a design-led approach. We consider that this accords with London Plan Policies on good growth and design (i.e. GG2.D, D3 and D4).
- 2.2. We also support the ambition of criteria GR1.A to require that proposals respond appropriately to their local context in terms of building height, massing, footprint, building line, scale and existing design characteristics. This broadly corresponds with the London Plan Guidance for [Optimising Site Capacity: A Design Led Approach](#), which defines optimum site capacity as “development with the most appropriate form for its site, following an evaluation of the site’s attributes, its surrounding context and its capacity for growth” (2023, para. 1.3.1). Aspects to be considered in this regard include environmental and infrastructure opportunities, connectivity, permeability and access to local services, built form and open spaces, heritage and place-making (including protected views), building heights, layout and land uses. Given this, we welcome that the Council proposes to clarify at paragraph 2.1.3 that the historic environment and protected views are specific considerations in the design-led approach.

### **GR4: Building Heights**

***Q13.13 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.***

- 2.3. We support the Council in seeking to ensure that tall building heights within Harrow are varied. Historic England’s own [guidance on Tall Buildings](#) highlights the importance of considering ‘variations of building heights e.g. to allow the stepping down of heights towards the edges of the cluster, or to create layering of buildings that can add townscape interest’ (2022, p.20). The character of an area will be influenced by building heights, and variety in those heights will be important for a range of visual, environmental and functional

reasons. This is well evidenced by the Harrow Tall Building Study (2024) and the Harrow Characterisation Study (2024), which justifies the approach in the plan. For example, the TBS states that:

- In Wealdstone South, variation in height is required to avoid harming a protected viewing corridor and ‘overshadowing’, as well as to integrate with surrounding context. (p.126)
- Along Lyon Road, tall buildings should vary in height ‘*to avoid establishing a canyon effect and wind tunnel*’ (p.130).
- In Harrow Town Centre, the maximum building height ‘*would only be acceptable on a small portion of the sub-area*’ as it is constrained by the heritage considerations, protected views, as well as the need to avoid ‘overshadowing’, and to integrate with surrounding low-rise buildings (p.133).

- 2.4. Furthermore, it should be noted that the Tall Building Study is only a high-level assessment that identifies certain suitability criteria and maps some key sensitivities. Further detailed assessments – including Heritage Impact Assessment – will be needed at planning application stage to inform the appropriate height and form of tall buildings.
- 2.5. In our view, the Council’s approach accords with the design-led approach to optimising site capacity that underpins the London Plan, and we would highlight that the associated guidance encourages that even in areas where tall buildings may be appropriate alternative building typologies and configurations (e.g. mansion blocks and mid-rise) should be considered to see if they can provide a similar number of homes and a more suitable design solution (para. 3.3.4, p. 18).

***Q. 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?***

- 2.6. We understand that the Council has decided that tall building heights will not be specified in the individual site allocation policies. Historic England does not object to this as we acknowledge that the heights are included on a map in the Local Plan, thereby conforming with the requirements of the London Plan D9.B.
- 2.7. Further to this, Historic England support the Council’s use of ‘up to’ when discussing what tall building heights may be appropriate. As paragraph 3.9.3 of the London Plan says, the identification of tall building areas and their appropriate/maximum heights ‘*does not mean that buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies*’. In other words, they are locations that are not definitively appropriate for tall buildings, but ‘may’ be appropriate for

tall buildings, and the same applies to the suggested 'appropriate' heights. Please also see our response to Q.13.13.

***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?***

- 2.8. As set out in our SoCG (p.9), Historic England considers that the requirement, at paragraph 4.8, for tall buildings to be of 'exemplary design' should be elevated to the main policy. If it is not, then it is important that this text supporting text is retained.
- 2.9. We wish to highlight the importance of supporting paragraphs 2.4.9 and 2.4.10 which acknowledge the limitations of the tall building evidence base<sup>1</sup> and justify the need for further detailed assessment. Paragraph 2.4.10 also helpfully highlights that the tall building zones are constrained by multiple protected views. As these views are primarily of the grade I St Mary's Church and the Harrow on the Hill Conservation Area these views also have the potential to contribute to the significance of these assets and change to them could harm that contribution. We therefore welcome that the Council is proposing to modify para. 2.5.2. of the supporting text to GR5: Protected Views to make it clear that both Townscape and Visual Impact Assessments and Heritage Impact Assessments will be required where these views are potentially affected (see our SoCG, p.11).

**GR4A: Basement Development**

***13.19 Is the policy as drafted justified and effective?***

- 2.10. Historic England and the Council have agreed a suggested modification to help ensure that the policy is both effective and positive in relation to the management of archaeological remains in line with the NPPF, particularly paragraph 203. Please see our SoCG (p.10) for more information.

**Policy HE1: 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.***

- 2.11. Although policy HE1.D does not explicitly require the decision maker to give special attention to the desirability of preserving or enhancing the 'character and appearance' of a conservation area, we are content that policy HE1.D is consistent with the statutory requirement of section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (hereafter the 1990 Act).

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<sup>1</sup> In other words, that the study is primarily townscape focused and only undertakes a high-level assessment of select suitability and sensitivity criteria.

- 2.12. The reason for this, is that it is not just the 'character and appearance' of a conservation area that decision-makers need to consider, but specifically the character or appearance derived from its 'special architectural or historic interest'.<sup>2</sup> In policy terms, 'special interest' is captured by the broader term 'significance'<sup>3</sup> and HE1.A explicitly requires decision-makers to support proposals that preserve, conserve or enhance the significance of heritage assets. Policy HE1.D: Conservation Areas, also cross-references to this requirement and specifically refers to both significance and character and appearance.

**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?**

- 2.13. To help ensure the clarity, consistency and effectiveness of Policy HE1 clearer Historic England and the Council have agreed suggested modifications, including some restructuring to ensure that all types of heritage assets are covered. The details of these suggested modifications can be found in our SoCG (p.14 – 16). However, we are aware that they may be difficult to follow, and it would be helpful if the Council could provide a full draft for review and refinement, which would be pleased to help with.
- 2.14. Part A of the Policy HE1 is derived from Policy DM7 of the current [Local Development Management Plan](#) (2013). However, it has been altered as a result of modifications requested Historic England, and accepted by the Council, at Regulation 18, namely: *'Proposals that secure the preservation, conservation or enhancement of a heritage asset's and its setting significance (including any contribution made by setting), or which secure opportunities for sustainable enjoyment of the historic environment, whilst avoiding and minimising harm to heritage significance, will be supported.'*
- 2.15. We have interpreted question 13.34 as querying the reference in HE1.A to 'sustainable enjoyment'. If correct, we wish to highlight NPPF the paragraph 189 states that heritage assets should be conserved so that they can be 'enjoyed' by existing and future generations. Further to this, it is sometimes the case that access, and conservation can come into conflict, with the needs of the former often diminishing the success of the latter. For example, monuments can be worn down and damaged by people walking on them, or objects can be damaged by exposure to light and humidity. Access can also result in wider sustainability issues such as carbon emissions. As such, we are content with the use of the term 'sustainable enjoyment' and consider that it aligns with the NPPF and its objective of sustainable development.
- 2.16. As an aside, if further modifications are considered to Policy HE1.A, then we would highlight that of the two terms 'preserve' and 'conserve' it would be our preference that the latter is retained. This is because it is clearly defined in the NPPF and best reflects current good practice regarding the positive

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<sup>2</sup> Section 69 of the 1990 Act states that LPAs should: '...determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance...'

<sup>3</sup> Defined in Annex 2 of the NPPF as: 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting....'

management of what is important about a heritage asset, rather than simply 'do no harm'.

**13.35 *Is part H of the policy effective?***

- 2.17. As drafted, part H of Policy HE1 is intended to guide decision making in relation to non-designated archaeological remains and requires that the Council will have regard to the guidance for Archaeological Priority Areas published by Historic England. However, suggested modifications have been agreed that would merge part H with parts F and G, covering scheduled monuments. As highlighted, at Q.13.34 above, it would be helpful if the Council could provide a full clean draft of the proposed policy for review, and we would welcome working with the Council to refine the policy.
- 2.18. Historic England welcome the current part H criterion. However, in our Regulation 19 response we highlighted that it would be beneficial to provide some further criteria to help discharge the duties of NPPF paragraphs 207 and 218 and ensure that archaeological remains are evaluated, where necessary, and subject to investigation and recording that delivers public benefits. As per our SoCG, this remains our preference and some suggested wording to facilitate this is included below.
- a. Require that proposals affecting archaeological remains are:
    - i. informed by the findings of an archaeological desk-based assessment and, where needed, the findings of a field evaluation.
    - ii. Conditioned to require a proportionate programme archaeological investigation and recording, that is, as a minimum, made publicly available through the Greater London Historic Environment Record. Investigations will also be required to include an element of public engagement, where feasible.