

By email:

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23 December 2025

Dear Sir/Madam

**Proposed Main Modifications to the draft Harrow Local Plan 2021-2041**

Thank you for consulting Historic England about the Proposed Main Modifications to the Harrow Local Plan. We have the following comments to make on the suggested changes to the Plan. Please note that throughout this response we have used red text to distinguish our proposed changes from those in the schedule of main modifications.

Ref	Policy / paragraph	Historic England comment
MM2	1.1.8 1.1.9	Historic England supports the addition of paragraph 1.1.9, which we agreed with the Council through discussions under the Duty to Cooperate. While we are supportive of the content of para 1.1.8, this may not be needed as it appears to duplicate some of the content of 1.1.9.
MM2	1.1.10	We also support the addition of paragraph 1.1.10 referring to the distinctive character and context of the borough and the adoption of a design-led approach.
MM5	SP01 e	We query why the reference to the Borough's areas of special character, and protection of those from harm, has been removed from the strategic policy? We suggest that this text is reinstated unless its removal is clearly justified.
MM2	2.0.7	We note the adjustment to this paragraph to cross reference Policy HE1 as agreed in our Statement of Common Ground (SoCG) with the Council.
MM6	2.1.3	We welcome the proposed modification of para 2.1.3 to refer to local context, the historic environment and protected views, as set out in our SoCG with the Council.
n/a	GR3A F	We are concerned to note that changes to Policy GR3A F, that were agreed in our SoCG, have not been taken forward. Part F appears to suggest that any level of impact up to 'substantial harm' (a high test) may be acceptable. To ensure the plan is sound, we suggest an alternative wording change to that agreed in our SoCG, as follows:

		<p><del>“...and substantial harm to heritage significance of the asset is avoided and proposals are in accordance with heritage policies”.</del></p>
MM9	GR4 C	<p>While we are sympathetic to the idea of framing Part C more positively, we are concerned that the modified text suggests that any proposal within the maximum height parameters for each location will necessarily “be supported”.</p> <p>We do not consider this an adequate response to the evidence base, as proposals should only be supported if the final height and design also responds to heritage sensitivities and other matters.</p> <p>We suggest the following adjustments to MM9 to ensure that the plan is justified, effective and consistent with national policy:</p> <p><del>“B. C. Proposals shall not exceed</del> <u>will be supported where proposals should reflect</u> the appropriate building heights as set out within the designated tall buildings zones shown <del>within on</del> the Policies Maps.”</p>
MM9	GR4 C	<p>We are concerned to note the removal of the original Part C, as we consider this to be in accordance with Policy D9 B(3) of the London Plan, i.e. “3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans”.</p>
MM9	GR4 E(b)	<p>We welcome the addition of a clause requiring tall buildings to be of an exemplary design.</p>
MM9	GR4 E(c)	<p>We are concerned to note the removal of a reference to heritage in GR4 E(c) and request that this modification is adjusted to better align with the agreed wording in our SoCG:</p> <p><del>“c. The protection and preservation of</del> <u>heritage assets, local heritage views protected views</u>, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps);”</p>
MM9	2.4.1	<p>We welcome the addition of new supporting text promoting alternative high density typologies, such as mansion blocks and mid rise, as these will often be less harmful and more sensitive to the historic environment.</p>
MM9	2.4.2	<p>We welcome the clarification within supporting text that some, but not all, buildings could be tall in tall building areas and that only a minority should reach the maximum height.</p>
MM10	2.0.11	<p>We support the addition of text highlighting archaeological considerations in relation to basement development, as agreed in our SoCG. However, to ensure that the meaning of this is clear we suggest the following adjustment:</p> <p><del>“2.0.11 Proposals for new basements within an Archaeological Priority Area (APA) should</del> <u>be informed by consultation with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment.”</u></p>

MM12	GR6	<p>We note with some concern the removal of Policy GR6 relating to Areas of Special Character, the purpose of which included preserving or enhancing the environmental, architectural, historic and landscape features that contribute to that special character.</p> <p>While the reason given is that the policy is not justified, the rationale for this conclusion is not provided in the schedule.</p>
MM13	GR8	<p>We do not agree that the deletion of part A(c) of the policy will improve the effectiveness of the plan, particularly as we do not consider the wording renders the plan unsound. This wording adds value by assisting developers in recognising that in some cases shopfronts may contribute to the significance of a heritage asset (for example a historic shopfront on a listed building or within a conservation area).</p>
	A(c)	We request that part A(c) is reinstated.
	A(f)	Similarly, we request that the reference to heritage assets is reinstated in part A(f).
	B	We are similarly concerned about the removal within part B of the reference to SPDs relating to Conservation Areas.
	2.8.4	We object to the removal of text relating to heritage assets at para 2.8.4. We do not consider that this duplicates text elsewhere in the plan as no other part of the plan refers to historic shopfronts.
MM17	SP02 (e)	We support the modification to SP02 part e to better align with the NPPF and London Plan. This is in line with changes agreed through our SoCG.
	C	We also welcome much of the proposed change to part C, which broadly aligns with the wording agreed through our SoCG. However, we recommend that the words “preserve or enhance” are replaced with the words “conserve and enhance” to improve consistency with NPPF chapter 16: <i>Conserving and enhancing the historic environment</i> .
MM18	HE1 A	We note the proposed modifications to HE1 A. As with our comment on SP02, we recommend that “preserve or enhance” is replaced with “conserve and enhance”.
	3.1.13 – 3.1.14	We do not support the removal of paragraphs 3.1.13 and 3.1.14 which provide a useful summary of what is meant by non-designated heritage assets in the Harrow area. Moreover, the reference to Local Areas of Special Character is not included in the text that follows.

n/a	HE1 3.1.18	<p>Paragraph 3.1.18 states that Harrow's Archaeological Priority Areas <i>are shown on the Harrow Policies Map</i>.</p> <p>Harrow's Archaeological Priority Areas are now undergoing review, with publication of the findings anticipated in spring/early summer 2026. This will include adjustments to the area boundaries. It would therefore be unhelpful if developers were directed to rely on the former boundaries.</p> <p>To address this issue, we propose the following modification to paragraph 3.1.18</p> <p>"3.1.18 The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Monuments and Archaeological Priority Areas are shown on the Harrow Policies Map and further information about them is available via the Council's website. <u>It is important to note that Harrow's Archaeological Priority Areas are undergoing review during 2025-26. The outcomes of this review, which will include refinements to the boundaries, are due to be published during 2026. Applicants should therefore seek up to date information on Harrow's Archaeological Priority Areas on the website for Historic England and the Greater London Archaeological Advisory Service.</u> The desirability of preserving a scheduled monument and its setting ..."</p> <p>We would be pleased to work with the Council to incorporate the new boundaries into the Local Plan Policies Map in 2026, if this can be achieved within the timescale for adoption.</p>
MM22	HO3 2	<p>We are concerned to note the removal of part 2 which aims to ensure that proposals for intensification through provision of housing on small sites responds to the evidence base in the Harrow Characterisation Study and Tall Building (2021).</p> <p>We suggest that part 2 is reinstated as this clause does not render the plan unsound, but rather helps to ensure that it is justified and effective.</p>
MM30	HO12	<p>We welcome the additional wording to the policy for Gypsy and Traveller accommodation to ensure an appropriate design response to the nearby listed building. However, we suggest a slight adjustment to the modification, as follows, to better align with national planning policy:</p> <p><u>"Any expansion will need to be well designed to <del>conserve protect</del> or enhance the significance of nearby Watling Farm Grade II Listed building and it's setting."</u></p>

MM32	SP05 B	We query the removal of part B of the policy which establishes that development in the Harrow & Wealdstone Opportunity Area should be planned in a comprehensive manner and where relevant supported by masterplans. We consider this a positive policy provision to support place shaping. While the suggested reason for its removal is duplication of other parts of the plan, as part B specifically relates to the Opportunity Area, and does not render the plan unsound, we suggest that it is reinstated.
	F	Similarly, it is not clear how removal of part F which refers to the Harrow Town Centre Masterplan would assist with positive place shaping or indeed make the plan sound.
	H d (new part F)	We object to the removal of part H d which refers to the heritage and character of Wealdstone District Centre. While the stated reason is that this repeats policy elsewhere, this wording has been drafted for a specific area and is not considered to render the plan unsound. We believe its removal is inconsistent with the NPPF, which requires plans to <i>set out a positive strategy for the conservation and enjoyment of the historic environment</i> .
MM42	SP07 G (former J)	We support the clarification of part G to ensure that it is effective, and which aligns with agreed wording in our SoCG.
	7.0.2	Similarly, we support the additional sentence at paragraph 7.0.2 to refer to Natural England's green infrastructure guidance, to promote a character led approach.
MM43	GI1	We are concerned by the removal of references to visual amenity and character, and protection and enhancement of heritage assets, in parts C and D of the policy for Green Belt and Metropolitan Open Land. We note that the policy now defers to policies in the NPPF. However, consideration should be given to the fact that the Greater London Authority's <i>Towards a New London Plan</i> consultation signals that policy for MOL will in future be separated from policy for Green Belt.
	7.1.8	The justification for removal of a paragraph that relates to Harrow College (which refers to its inclusion or otherwise on the Policies Map) is unclear. As paragraph 7.1.8 refers to the local architectural and historic merit of the original college building, and promotes its retention, we would welcome its reinstatement.
MM59	Table	It is not clear on what basis indicative capacities have become "minimums", while similar minimum non-residential floorspace figures have been added. It is also unclear whether any testing of these capacities has been carried out in relation to their likely impacts, including potential harm to the historic environment.



		If the Inspector considers that these figures can be broadly justified, then we request that column headings are amended to state <u>“Indicative... capacity... subject to detailed design and impact assessments proposals.”</u>
MM62 MM63 MM64 Etc.	OA1 OA2 OA3	<p>We welcome the adjusted wording to indicate that sites “may be” appropriate for tall buildings as this will be subject to detailed design and site specific impact assessments.</p> <p>However, as with MM59 above, it is not clear on what basis all “indicative” figures should become “minimum” until such work has been carried out. We suggest that this text reverts to that in the draft plan Regulation 19 consultation and that figures are “indicative”.</p> <p>We also question the removal of the reference to the Harrow and Wealdstone OA Tall Building Study and Harrow Town Centre Masterplan from OA1 as these documents provide helpful guidance.</p>
MM73 MM74 MM75	OA12 OA13 OA14	<p>Please see our comments above in relation to justification of “minimum” or “indicative” capacities.</p> <p>We welcome the addition of Byron Recreation Ground as a key heritage consideration.</p> <p>In line with our SoCG we suggest the addition of the following text to clarify this within the development principles: <u>“Development should conserve and enhance the significance of the locally listed Byron Recreation Ground.”</u></p>
MM77	OA16	<p>Please see our comments above in relation to justification of “minimum” or “indicative” capacities.</p> <p>We welcome the addition of relevant heritage planning considerations, in line with our SoCG.</p> <p>However, we also request an associated development principle: <u>“Development should conserve and enhance the significance of the Headstone Manor complex.”</u></p>
MM79	GB1	<p>While we welcome the reference to heritage considerations on this site, it appears that these should be rationalised as follows:</p> <p>“Scheduled <del>Ancient</del> Monuments (Brockley Hill Romano-British pottery and settlement) <u>Scheduled Monument</u> and <u>non-designated archaeological remains</u>”</p> <p>We also welcome the addition of text highlighting the need for an archaeological desk-based assessment, although we consider that the fuller text included in our SoCG would provide greater clarity</p>

		along with an emphasis on positive management through a Conservation Management Plan.
MM80	GB2	We broadly welcome the new development principle of conserving or enhancing the significance of Watling Farm, but we recommend the following clarifications: <u>"Development shall conserve <del>or</del> and enhance the significance of the Locally Grade II Listed Watling Farm."</u>
MM83	O3	We note that the proposed modifications do not include the below, which was included in our SoCG, and we encourage the incorporation of this text within the development principles and/or heritage considerations (which are currently empty): <u>"Development should conserve and enhance the significance of the Locally listed British Legion Club."</u>
MM85	O5	In line with our comment on GE6, we query the removal of a reference to Areas of Special Character within this policy.
MM93	O13	While we welcome the adjustment of the development principles in relation to the setting of Elliot Hall, we would again suggest the wording "conserve and enhance" in preference to "preserve or enhance".
MM98	O18	We welcome the adjustment of development principles relating to heritage for this site, which are similar to those included in our SoCG. However, this should be amended to reflect the fact that the church is grade II* listed rather than grade II as suggested.
MM109	GR-I5 HE-I2	We welcome the inclusion of a monitoring indicator relating to protected viewing corridors. We also welcome the inclusion of an indicator for listed buildings, which aims to ensure no loss.

If you have any queries about any of the matters raised in this response, or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely

