

Harrow Monitoring Group

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[Harrow Monitoring Group](#) - email

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&
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London Borough of Harrow

sent by email on 26 January 2026

Subject: The Harrow Local Plan: policy recognition without policy weight

Context: Built Heritage as strategic infrastructure within broader policy objectives

Dear Strategic Directors

Considering that the Government, particularly through the Department for Culture, Media and Sport and Historic England, is increasingly focused on integrating built heritage into wider objectives for economic regeneration, community ownership, environmental sustainability, and social cohesion, and recognising that Harrow's Core Strategy is intended to operate as a working or "living" document, we are writing to you jointly to raise a number of substantive concerns regarding the treatment of built heritage within the Harrow Local Plan and its wider governance across the Council.

Harrow is a highly culturally diverse borough, and this diversity is inseparable from its historic environment. Harrow's built heritage, much of it non-designated, forms the backbone of the borough's historic identity, local distinctiveness, and community life. It is the accumulated fabric of villages, suburbs, civic spaces, places of worship, high streets, and everyday buildings that gives Harrow legibility and meaning as a place, reflecting successive waves of settlement, migration, and cultural expression. Yet current planning, funding, and regeneration practices consistently fail to recognise this heritage as a strategic asset. Instead, it is too often treated as a residual consideration, accommodated where convenient and overridden where growth pressures assert themselves. With leadership and reform, Harrow's built heritage could instead become a driver of sustainable regeneration, civic confidence, and delivery of *Restoring Pride in Harrow*, a stated corporate priority for 2023–2026.

The richness of Harrow's historic environment extends far beyond its listed churches, manor houses, and conservation areas. Historic settlements such as Harrow on the Hill, inter-war suburbs shaped by transport expansion, post-war civic buildings expressing social ambition, industrial remnants, and unassuming townscape elements together form a layered and coherent historic environment. Much of this value resides in non-designated heritage assets which, while lacking statutory protection, are central to the historic character and lived experience of place. In a highly culturally diverse borough such as Harrow, these assets play a vital role in providing

continuity and familiarity, anchoring communities, and supporting a shared sense of belonging across different cultures and generations during periods of rapid change.

In principle, Harrow's Local Plan acknowledges the importance of heritage. In practice, however, it fails to treat built heritage, particularly non-designated heritage assets, as strategic infrastructure. Heritage policy remains largely reactive, relying on designation status and case-by-case development management rather than embedding significance-led thinking into the spatial strategy of the borough. As a result, heritage considerations are routinely subordinated to housing delivery targets and density assumptions, rather than shaping how and where growth should occur. Heritage becomes something to be mitigated once development quantum is fixed, rather than a factor that informs development capacity from the outset.

The Local Plan's approach to non-designated heritage assets is especially weak. While NDHAs are referenced, there is no systematic requirement to identify, assess, or map them comprehensively at the plan-making stage. Responsibility for recognising heritage value is therefore displaced onto the development management process, where time, resources, and negotiating leverage are inherently constrained. In this context, NDHAs are often assessed late, inconsistently, or only once harm is already proposed, at which point meaningful avoidance or redesign becomes difficult. This reactive approach undermines the very purpose of plan-making, which should be to provide clarity, certainty, and a robust framework for managing change.

More fundamentally, the Local Plan does not adequately operationalise the concept of significance, despite its central role in national planning policy and Historic England guidance. Policies tend to focus on harm minimisation rather than on understanding what contributes to character and how those qualities can positively inform change. This encourages a defensive and minimalist approach to heritage, where retention is treated as a constraint on development rather than as an opportunity for adaptation, placemaking, and long-term value creation. The result is a pattern of incremental erosion that may comply procedurally with policy but fails substantively to conserve what matters, particularly in neighbourhoods where heritage underpins cultural identity and social cohesion.

This imbalance is reinforced by the Plan's growth and regeneration framework. Opportunity areas, town centres, and intensification zones are promoted primarily through quantitative metrics, units delivered, floorspace maximised, and density increased, with limited qualitative guidance on how the historic environment should structure development capacity. Heritage is therefore addressed after growth parameters are fixed, undermining stated ambitions for character, identity, and sustainable placemaking. In effect, the Plan asks heritage to adapt to growth, rather than requiring growth to respond intelligently to place.

The Local Plan also lacks a credible delivery framework for heritage outcomes. It does not articulate how heritage-led regeneration will be funded, incentivised, or prioritised, nor does it meaningfully link heritage policy to developer contributions, council-led regeneration initiatives, or asset management strategies. Without clear mechanisms for delivery, heritage

policy remains aspirational rather than actionable, dependent on goodwill rather than embedded in decision-making and investment.

We are similarly concerned that responsibility for Harrow's historic environment is currently fragmented across policy silos. The Culture, Environment & Economy directorate has a critical role in protecting and promoting Harrow's heritage as a cultural, economic, and environmental asset, particularly in a highly culturally diverse borough, through cultural strategy, town centre vitality, tourism, community engagement, climate adaptation, and the stewardship of public realm and council-owned assets. Without clear alignment between this portfolio and planning and regeneration functions, opportunities for heritage-led economic development, skills creation, community ownership, and sustainable reuse are being missed.

By failing to address known and persistent risks, such as deferred maintenance, skills shortages, and the cumulative impact of incremental change, the Local Plan implicitly accepts gradual erosion as an acceptable by-product of growth. This position sits uneasily with national policy intent and directly contradicts the council's stated ambition to restore pride in Harrow. If pride is genuinely to be restored in a highly culturally diverse borough, the physical fabric that embodies collective memory, identity, and continuity must be actively cared for, not passively managed into decline.

Built heritage in Harrow must therefore be treated as strategic infrastructure, not a planning afterthought. It is a finite and irreplaceable asset that underpins economic resilience, social cohesion, environmental sustainability, and cultural vitality. Recognising this requires joint leadership across Housing and Regeneration and Culture, Environment & Economy: a shift from reactive control to proactive management, from designation-led protection to significance-led planning, and from viewing heritage as a constraint to understanding it as a foundation for long-term public value. Without such a shift, the Local Plan risks presiding over managed loss rather than sustainable change.

Recommendations

Harrow Council should treat built heritage, including non-designated assets, as strategic infrastructure within the Local Plan and wider corporate decision-making. Significance-led planning should be embedded so that heritage informs where and how growth occurs, rather than being addressed after development parameters are fixed. Non-designated heritage assets should be systematically identified, mapped, and understood at the plan-making stage through a robust local list supported by clear statements of significance.

The Local Plan should be underpinned by a credible delivery framework that links heritage policy to funding mechanisms, developer contributions, regeneration programmes, and council asset management. Heritage-led regeneration should be explicitly recognised as a driver of economic resilience, cultural vitality, and social cohesion in a highly culturally diverse borough.

Finally, the Council should address skills, capacity, and maintenance challenges through coordinated leadership across planning, regeneration, culture, and the local economy, ensuring the Local Plan supports sustainable change rather than incremental loss.

Looking forward to hearing from you.

Kind regards

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also former councillor and planning committee member, London Borough of Harrow

Cc

Cllr Marilyn Ashton, deputy leader, portfolio holder for planning & regeneration LBH and chair, Harrow Heritage Trust

Cllr Janet Mote, portfolio holder for community & culture LBH

Alex Dewsnap, managing director LBH

also shared with a small number of selected others

References

1. Department for Levelling Up, Housing and Communities (DLUHC). *National Planning Policy Framework (NPPF)*, latest edition.
2. Department for Culture, Media and Sport (DCMS). *Heritage Statement*.
3. Historic England. *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*.
4. Historic England. *Local Heritage Listing: Identifying and Conserving Local Heritage*.
5. Historic England. *Statements of Heritage Significance: Analysing Significance in Heritage Assets*.
6. Historic England. *Heritage and the Economy*.
7. Historic England. *The Value of Conservation: Evidence, Metrics and Impact*.
8. Historic England and UK Green Building Council. *Building Carbon Reduction and Historic Buildings*.
9. Greater London Authority. *The London Plan*, in particular Policies HC1 (Heritage Conservation and Growth) and HC2 (World Heritage Sites).
10. London Borough of Harrow. *Harrow Local Plan*.
11. London Borough of Harrow. *Conservation Area Appraisals and Management Plans*.
12. London Borough of Harrow. *Corporate Plan: Restoring Pride in Harrow 2023–2026*.
13. The Heritage Alliance. *Heritage Creates: Heritage and the Creative Economy*.
14. Institute of Historic Building Conservation (IHBC). *Guidance on Conservation Skills, Capacity and Practice*.
15. UK Government. *Levelling Up the United Kingdom White Paper*.