

Harrow Monitoring Group

advocating inclusion so everyone can access - and shape - the services they need

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6 April 2026

Built Heritage ignored: officer silence undermines Harrow's claim to pride

Executive Summary

A letter sent on 26 January to Harrow Council's senior officers, raising substantive concerns about the treatment of built heritage in the Local Plan, has received no response despite reminders and escalation to the Managing Director. While Councillor Marilyn Ashton, Deputy Leader and portfolio holder for Planning and Regeneration, has provided a political explanation citing national policy constraints and housing targets, the absence of any officer engagement leaves critical technical and governance issues unanswered. These include the failure to treat built heritage as strategic infrastructure, weak handling of non-designated heritage assets, and the lack of a credible delivery framework. The silence raises questions about accountability, professional responsiveness, and whether the Council is willing to engage with evidence-based critique. At the same time, the Council promotes civic pride through public messaging, creating a growing gap between rhetoric and the stewardship of Harrow's historic environment. This disconnect carries reputational risk and undermines confidence in the Council's ability to manage growth while sustaining the character and identity of the borough.

Political reply, officer silence: questions over heritage and accountability

There is a point at which silence ceases to be administrative delay and becomes something more consequential: a signal of institutional reluctance to engage with substance. That point has now been reached. A detailed and strategically framed letter (annexed), sent on 26 January to the Council's senior officers and copied to the Managing Director, has received no response, despite reminders, despite its evident link to national policy direction, and despite its direct relevance to the Council's own stated ambitions. The absence of officer engagement is no longer a procedural lapse; it is a governance issue with implications for credibility, accountability, and ultimately the reputation of the authority itself.

The contrast with political response is instructive. On 29 March, Councillor Marilyn Ashton, Deputy Leader and portfolio holder for Planning and Regeneration, set out the defence of the newly adopted Local Plan: constraints imposed by national policy, the necessity of meeting housing targets, and the risk of falling back on an obsolete Core Strategy. This is a recognisable political position, grounded in the realities of plan-making within the framework set by central

government and the planning inspectorate. It acknowledges limits, explains trade-offs, and asserts that progress, however imperfect, has been secured.

But the Monitoring Group's letter was never simply about those constraints. It was directed to officers precisely because it addressed matters that sit within the professional, operational, and strategic domain of the Council's administration: how policy is interpreted, how evidence is assembled, how frameworks are operationalised, and how cross-departmental leadership is exercised. The issues raised, failure to treat built heritage as strategic infrastructure, the absence of a systematic approach to non-designated heritage assets, the lack of a delivery framework, and the fragmentation of responsibility across directorates, are not political talking points. They are technical, structural, and managerial questions. They require officer engagement because only officers can meaningfully answer them.

The failure to respond therefore raises an unavoidable question: why has there been no officer engagement? It cannot plausibly be because the issues lack substance. The letter is closely matched to the trend set by Historic England and the Department for Culture, Media and Sport, both of which have been explicit in promoting the integration of built heritage into economic regeneration, environmental sustainability, and social cohesion. Nor can it be because the matters fall outside the remit of those addressed; the Strategic Directors of Housing & Regeneration and of Culture, Environment & Economy sit precisely at the intersection where these questions must be resolved.

What remains, then, is a more troubling interpretation: that engagement is being avoided because the issues raised expose a structural weakness in how the Council is approaching growth and change. The Local Plan, as described in the letter, acknowledges heritage in principle but marginalises it in practice, treating it as a residual constraint rather than a structuring asset. Non-designated heritage, arguably the most socially and culturally significant layer in a borough as diverse as Harrow, is left to be identified late, inconsistently, and often ineffectively. Delivery mechanisms are absent, leaving policy aspirations unanchored in funding or implementation. Responsibility is dispersed across silos, diluting accountability and weakening outcomes.

These are not minor technical oversights; they go to the heart of whether the Local Plan can deliver the kind of place-making it claims to support. To engage with them would require acknowledgement that the issue is not simply one of external constraint but of internal orientation: a system that defaults to quantitative growth metrics while struggling to embed qualitative, significance-led planning. It would require officers to articulate how heritage can actively shape development capacity, rather than merely mitigate its impacts. It would require, in short, a shift from procedural compliance to strategic leadership.

Set against this silence is a different kind of messaging emerging from the Council's leadership: a call to pride. In marking milestones such as Harrow's 60th anniversary, the Council has sought to cultivate a sense of collective identity, inviting residents to feel proud of the borough. This is politically intelligible, particularly in a context where appeals to place-based belonging

connects with segments of the electorate, including those drawn to more overtly nationalistic narratives. But the disjunction is stark. Pride is being invoked rhetorically, while the material foundations of that pride, Harrow's built heritage, its accumulated urban fabric, its historic environments, are not being treated with corresponding strategic seriousness.

This is precisely the point made in the Monitoring Group's letter: that in a highly culturally diverse borough, built heritage is not an optional embellishment but the substrate of shared identity. It is what provides continuity across generations and communities, what anchors memory and meaning in the face of rapid change. To treat it as an afterthought is not simply a planning error; it is a failure to understand what pride in place actually rests upon.

The reputational implications for the Council are therefore significant. At a minimum, the absence of officer response undermines confidence in the Council's willingness to engage transparently and professionally with informed external critique. It suggests a governance culture in which difficult or inconvenient questions can be deferred indefinitely, rather than addressed openly. For stakeholders, residents, community groups, heritage bodies, and potential partners, this erodes trust in the robustness of the Council's decision-making processes.

More fundamentally, it risks exposing a gap between narrative and reality. A Council that publicly champions pride in place but fails to engage with substantive proposals on how that place is conserved and shaped invites accusations of superficiality. The danger is not immediate scandal but gradual reputational attrition: a perception that the authority is more comfortable with messaging than with the hard, technical work of aligning policy, delivery, and long-term stewardship.

There is still an opportunity to correct course. Officer engagement, even at this stage, could reset the conversation, acknowledging the issues raised, clarifying the Council's position, and outlining how the identified gaps might be addressed within existing constraints. Such a response would not require abandoning the Local Plan or denying the realities of national policy; it would require demonstrating that within those realities, the Council is willing to think rigorously and act strategically about the assets that define Harrow as a place.

Until that engagement occurs, the silence will continue to speak for itself. And what it currently conveys is not confidence, nor control, but an absence at the very level where leadership is most needed.

Annex next

ANNEX

Harrow Monitoring Group

advocating inclusion so everyone can access - and shape - the services they need

[Harrow Monitoring Group](#) - email

Emma Talbot, Strategic Director of Housing & Regeneration
&
Cathy Knubley, Strategic Director of Culture, Environment & Economy
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

Husain Akhtar
Coordinator
Harrow Monitoring Group
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

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