



**Report for:                      Planning Policy  
   Advisory Panel**

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<b>Date of Meeting:</b>	13 <sup>th</sup> July 2023
<b>Subject:</b>	Local Areas of Special Character – outcomes of consultation on the proposed designation criteria
<b>Key Decision:</b>	Yes – when considered by Cabinet
<b>Responsible Officer:</b>	Viv Evans, Chief Planning Officer
<b>Portfolio Holder:</b>	Councillor Marilyn Ashton, Deputy Leader of the Council, Planning & Regeneration Portfolio Holder
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	No
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 – Responses to informal consultation

## **Section 1 – Summary and Recommendations**

The Planning Policy Advisory Panel considered draft criteria for the proposed Local Area of Special Character (LASC) designation at its meeting on 6 March 2023. This report feeds back representations received to informal consultation on the proposed criteria and recommends minor changes arising from these. It then recommends that the Panel commends the criteria to Cabinet for adoption..

**Recommendations:**

The Planning Policy Advisory Panel is requested to:

- (A) consider the consultation responses on the criteria for the new local heritage designation namely proposed ‘Local Areas of Special Character’; and

(B) recommend to Cabinet the criteria for designation (including the minor clarification), as set out in paragraph 6.3 of the report.

**Reason:**

Harrow benefits from an exceptionally diverse historic environment. It includes conservation areas designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. The National Planning Policy Framework [NPPF] cautions that 'the concept of conservation not [be] devalued through the designation of areas that lack special interest'. At the same time the NPPF and Historic England's national guidance recognise the importance and necessity of identifying and maintaining up to date records of the significance of local heritage assets. There are many local areas in Harrow that might not meet the strict criteria for conservation area status but do have local heritage interest. Accordingly, this report proposes the designation criteria for the new local designation for such Local Areas of Special Character. This proposed local designation, and its associated local criteria for designation, is a parallel to the existing local designations of locally listed buildings and locally listed parks and gardens in Harrow for those buildings and areas that do not meet the strict criteria for national heritage designation. The local consultation undertaken was in accordance with national best practice.

## **Section 2 – Report**

### **1.0 Introduction**

- 1.1 The report incorporates the corporate priority concerning:
- Putting Residents First

It also reflects the overarching objective of Restoring Pride in Harrow.

- 1.2 Should the new suggested criteria for the designation of Local Areas of Special Character be confirmed, the ability to designate Local Areas of Special Character will provide improved protection to help maintain the unique historical local character of areas or neighbourhoods within Harrow which residents cherish and value.

## **2.0 Options considered**

- 2.1 The option of not introducing these new criteria for designation, nor subjecting the proposed criteria for designation to local consultation, was considered but this would be contrary to the obligations placed on the Council under the NPPF which states in paragraph 192 that 'Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to: a) assess the significance of heritage assets and the contribution they make to their environment'. It would also be at odds with the approach Harrow takes to buildings and landscapes of local interest but not worthy of national interest via national versus local listing.
- 2.2 The option of not consulting on the proposed criteria was dismissed as such a process is considered beneficial with respect to testing the technical merits of the proposed criteria and their clarity.

## **3.0 Background**

### *What is a Proposed Local Area of Special Character?*

- 3.1 The Panel at their meeting on 6<sup>th</sup> March 2023, agreed to the principle of a new local heritage designation of: Local Areas of Special Character, to be seen as a lower level of heritage interest to those of statutory Conservation Area status. The new heritage designation is designed for areas with a level of local interest / significance that would benefit from formal recognition to help assessment of planning applications. The implication would be that it would be a material consideration for any planning applications in terms of whether what is special about the heritage interest of that area is preserved by the proposal, either via a direct impact on it or via impact on its setting. Relevant heritage policies relating to non-designated heritage assets in the NPPF and Local Plan would apply i.e. the Core Strategy policy CS1: Overarching Policy and Development Management policy DM7: Heritage Assets. NPPF paragraph 203 would apply which states:

*'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.*

### *Suggested criteria for designation*

- 3.2 The panel at their meeting on 6<sup>th</sup> March 2023, agreed to informal consultation regarding criteria for designation. It was agreed that the criteria must connect back to national heritage policy and guidance on the heritage significance of heritage assets. For example, Harrow's criteria for conservation area status, but also relate back to national heritage legislation, namely the Planning

(Listed Buildings and Conservation Areas) Act 1990's definition of conservation areas as 'areas of special character and appearance' that it is 'desirable to preserve or enhance' and wider national and local policy and guidance relating to heritage significance including the NPPF. Similarly, the Historic England guidance document entitled Local Heritage Listing Historic England Advice Note 7 which provides a list of various criteria likely to indicate the nature of heritage significance/interest including: age, rarity, aesthetic interest, group value, historic association, and social and communal value.

3.3 The suggested criteria for designation for Local Area of Special Heritage Character subject to consultation was therefore as follows:

1. *The area must be of heritage significance.*
2. *One or more of the following criteria need to be met:*
  - a. *Townscape of locally cohesive, well-preserved quality.*
  - b. *Architecture of locally cohesive, well-preserved quality.*
  - c. *Landscape of locally distinctive and well-preserved quality.*

*Overall, an area must have discernibly higher quality and degree of intactness than other parts of the borough (other than designated conservation areas, that have special architectural or historic interest), thereby demonstrating distinctiveness.*

## **4.0 Process and timeframes for consultation undertaken**

4.1 There are no statutory requirements to consult on the criteria for LASC, however as best practice and the Historic England recommendation, Harrow consulted with local and national conservation groups namely:

- the Harrow's Conservation Area Advisory Committee.
- Society for the Protection of Ancient Buildings
- Victorian Society
- Georgian Group
- Twentieth Century Society
- Gardens Trust
- Council for British Archaeology

4.2 These groups were emailed on 21st April 2023, provided with an explanation of the background (including link to PPAP report) and requirements of the consultation, and provided with a month to respond with any representations.

## **5.0 Responses to consultation request**

5.1 These are listed in full in appendix 1.

5.2 In summary, seven responses were received. Support for the new local heritage designation was overwhelmingly expressed (five respondees) including the Historic England, Victorian Society, and the Conservation Area

Advisory Committee. The remaining two respondees did not comment on the merits of a local designation.

5.3 Just three responses specifically commented on the proposed criteria for designation. Historic England noted the methodology and justification for the proposal [which includes the criteria] is set out clearly in the 23 March 2023 report to the Planning Policy Advisory Panel and follows Historic England published guidance on ‘The Designation of Local Heritage Listing’ (Heritage Advice Note No.7). As such ‘we consider the proposal to be in conformity with the NPPF requirement to conserve heritage assets in a manner appropriate to their significance and to plan positively for the management of the historic environment.’ The Victorian Society noted ‘we would make no comments on the proposed criteria which seems wide ranging enough to encompass various areas’. The Conservation Area Advisory Committee noted that the proposed criterion regarding ‘identification of areas of heritage significance’ seems difficult. Clarification on what this would mean was requested. Therefore, it is now recommended that this criterion be amended to define heritage significance as outlined in section 6.

5.4 Otherwise, six areas to be considered for LASC designation were recommended by two respondents, namely:

- 1) West Harrow Village
- 2) West End Avenue (the oldest part) mostly built by World War I.
- 3) Meadow Road, Pinner – classic Metroland
- 4) The Royston Park Estate including the later developments of Rowlands Avenue, Furham Field and Sherington Avenue - low density parts of Hatch End, plentiful historic trees, interlinking footpaths following original field lines.
- 5) St Anselms Road, Wellington Road, Woodridings Avenue, Hillview Road – for the same reason as point 4.
- 6) Grimsdyle ditch from Oxhey Lane through to Woodridings Close (Footpath 129) - for the same reason as point 4.

These are noted and once the criteria for designation are agreed, these areas can be investigated further in due course.

5.5 The remaining ten comments/queries received, alongside council responses are provided in the table below:

<b>Consultation response</b>	<b>Council response</b>
1) Request to be updated on the designation as it is implemented and how this will affect planning decisions.	Noted. This will be done.
2) Will local residents be consulted as to whether they wish to be a part of a designated area.	Yes – as per local listing of buildings and introduction of conservation areas. The views of local residents would be sought via public consultation.
3) Will conservation and enforcement personnel be increased accordingly (noted	Currently there are no plans to increase the conservation resource. The

Consultation response	Council response
that enforcement have been non-responsive on some cases)?	enforcement team is separately proposed to be increased by two officers.
4) Will the Conservation Area Advisory Committee (CAAC) be asked for comments?	The views of CAAC on planning applications in Local Areas of Special Character will not be sought since their remit is Conservation Areas.
5) The Saunders Report available at <a href="https://historicengland.org.uk/research/results/reports/27-2021">https://historicengland.org.uk/research/results/reports/27-2021</a> (page 41) puts the proposal in context as other local authorities have done similar.	Noted that other Local Authorities have similarly introduced a local area designation.
6) Agree that the hierarchical distinction between conservation areas and Local Areas of Special Character is important.	Noted.
7) We already have an Area of Special Character in Harrow. There is a DM policy specially for it, namely DM6. It is mentioned in officer reports more recently. It covers almost all of Harrow on the Hill including 'islands' excluded from conservation areas.	The designation of 'Area of Special Character' differs to that which is the subject of this report. This report concerns the new heritage designation of 'Local Area of Special Character', which is a local heritage designation equivalent to a Conservation Area but at a lower level of significance ie local not national. The other designation is a strategic planning designation with related planning policy to support it ie Local Development Management policy DM6.
8) In order to preserve the special qualities of parts of Hatch End there is a need to maintain the relatively low-density, not convert houses to flats, manage scale of buildings (including via additional stories allowed via permitted development), preserve green front gardens, grass verges and street trees, rights of way and open spaces and parks.	As outlined fully in paragraph 3.1 above, the designation would be a material consideration for any planning applications in terms of whether what is special about the heritage interest of that area is preserved by the proposal, either via a direct impact on it or via impact on its setting. Relevant heritage policies relating to non-designated heritage assets would apply.
9) In order to provide a robust tool for planning decisions we would also recommend that the area-based assessments are subject to a clear summary report process which sets out the reasons for designation the significance of the area and the character of which it is desirable to preserve. These reports should be made publicly accessible on the Council's website and the Heritage Environment Record. Further detailed	This is noted and would be undertaken with any designations.

Consultation response	Council response
advice on producing and publishing the list is set out in our Heritage Advice Note No.7.	
10) It must be noted that this advice does not affect our [Historic England] obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.	This is noted and accepted.

## 6.0 Clarification to criteria for designation following consultation

6.1 The overwhelming support for the principle of designation is noted, as well as the support that the Victorian Society expressed for the proposed criteria for designation. There were no objections to the proposed criteria for designation and they therefore remain the same.

6.2 However, since one respondent requested the first criterion requiring ‘identification of areas of heritage significance’ be clarified. Accordingly, significance in this criterion is now provided with the current definition provided in the glossary of terms in the National Planning Policy Framework (2021), or any subsequent replacement national planning policy or guidance. The current definition is: ‘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’. In Harrow, for example, this may include certain more intact / locally cohesive areas of Metroland.

6.3 Therefore the criteria for designation of Local Areas of Special Character are now recommended to be as follows:

- 1) *The area must be of heritage significance (as defined in the National Planning Policy Framework (2021) or any subsequent replacement).*
- 2) *One or more of the following criteria need to be met:*
  - a. *Townscape of locally cohesive, well-preserved quality.*
  - b. *Architecture of locally cohesive, well-preserved quality.*
  - c. *Landscape of locally distinctive and well-preserved quality.*

*Overall, an area must have discernibly higher quality and degree of intactness than other parts of the borough (other than designated conservation areas, that have special architectural or historic interest), thereby demonstrating distinctiveness.*

## 7.0 Next Steps

7.1 The proposed criteria and any comments from the Panel on these will be presented to Cabinet for formal adoption. The criteria will then form the basis

of the consideration of any areas for potential designation, The New Local Plan will include reference to Local Areas of Special Character within the any heritage policies. In the meantime, formal identification of LASCs will assist in the application of Policy DM7: Heritage Assets to any proposals within these areas. Policy DM7, despite not specifically referring LASCs, is sufficiently broad to be a relevant policy 'hook' as it refers to 'heritage assets' (which LASCs will be a new category) and the level of significance of the assets (which as noted above, will be less than that of statutory Conservation Areas.

- 7.2 In terms of future identification of LASCs, at the 30<sup>th</sup> November 2022 Planning Policy Advisory Panel meeting, two areas: Butler Avenue (West Harrow) and Suffolk Road (North Harrow) were concluded to not meet the Harrow criteria for conservation area designation. It was noted though that for Butler Avenue, the West Harrow Community Forum should be contacted and if, as a result of this, there was a stronger case for designation, Officers should advise the Panel of this. Also, for Butler Avenue it was noted that a wider area could be considered for any future Local Area of Special Character (LASC) assessment. Accordingly, once the criteria for designation are confirmed, the Local Planning Authority will contact the West Harrow Community Forum to identify whether there is further information that indicates the area is worthy of conservation area status and otherwise review this area for possible Local Area of Special Character status.
- 7.3 It is noted that this consultation process has resulted in a number of further suggestions for possible Local Areas of Special Character as outlined in paragraph 5.4 above. In the context of limited resources, the Local Planning Authority cannot commit to a programme for reviewing these areas at this time. However, the suggestions are welcomed and noted. They will be kept on file, along with any future recommendations, with a view towards assessing them in future with the findings and recommendations brought forward to the panel.

## **8.0 Performance Issues**

- 8.1 The new designation will assist in protection of Harrow's local heritage.

## **9.0 Procurement Implications**

- 9.1 There are no procurement implications in the new local heritage designation.

## **10.0 Environmental Implications**

- 10.1 The designation would not have a direct environmental implication since it would be a heritage designation. But it may result in the preservation of landscape of locally distinctive and well-preserved quality which may have a positive environmental implication.

**Ward Councillors' comments** – Not applicable as impacts all wards



## Risk Management Implications

Risk included on Directorate risk register? No

Separate risk register in place? No

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below. **n/a**

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Consultation not undertaken in accordance with statutory requirements	<ul style="list-style-type: none"> <li>▪ There are no statutory consultation requirements.</li> <li>▪ Appropriate requirements were reviewed (i.e. Harrow's Statement of Community Involvement) and followed where relevant.</li> <li>▪ Any 'minimum' standards were exceeded (i.e. emails to 6 national amenity societies and to the Conservation Area Advisory Committee).</li> </ul>	<b>GREEN</b>
The agreement of the criteria for Local Areas of Special Character is later challenged	<ul style="list-style-type: none"> <li>▪ The criteria connect back to national heritage policy and guidance on the heritage significance of heritage assets including the NPPF and Historic England the guidance document entitled Local Heritage Listing Historic England Advice Note 7 which provides a list of various criteria likely to indicate the nature of heritage significance/interest.</li> <li>▪ Consultation was undertaken and responses informed the final criteria.</li> </ul>	<b>GREEN</b>
The submission of numerous proposals for Areas of Special Character with insufficient conservation resources to assess them	<ul style="list-style-type: none"> <li>▪ Whilst a programme for assessment cannot be committed to at this stage the matter will be kept under review, and areas assessed where possible.</li> <li>▪ Awareness by the Local Planning Authority (LPA) of potential areas for consideration for LASCs is helpful. Should a planning application be received that would effect an area considered to be of heritage</li> </ul>	<b>GREEN</b>

Risk Description	Mitigations	RAG Status
	significance by the LPA but has no formal heritage designation, it may still be assessed in the context of NPPF paragraph 203 which states: 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application' and requires 'a balanced judgement ...having regard to the scale of any harm or loss and the significance of the heritage asset'.	

## Legal Implications

The Council has a statutory duty and is required under section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to carry out reviews 'from time to time' to determine whether any parts or further parts of their area should be designated as conservation areas; and if it so determines, that part(s) shall be so designated. It follows that those not worthy, but still of heritage value, are recognised in accordance with the NPPF paragraph 192's requirement that: 'Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to: a) assess the significance of heritage assets and the contribution they make to their environment'.

## Financial Implications

The costs of developing the draft criteria and undertaking the informal consultation have been met from within the existing revenue budgets of the Council's Planning Policy team. If any further action is required (such as undertaking the process to designate a Local Area of Special Character), any costs will also be met from existing revenue budgets.

## Equalities implications / Public Sector Equality Duty

Was an Equality Impact Assessment carried out? No

EqIA is not considered necessary in respect of the designation of a Local Area of Special Character. Such a proposal is based on the architectural and historic merit of an area. Furthermore, the higher order Local Plan policy that contains the criteria against which development within Local Areas of Special Character is assessed was subject to an equalities impact assessment prior to its adoption.

## **Council Priorities**

The decision sought will help the Council meet the priority of improving the environment by helping ensure the attractiveness of the borough as a place to live and demonstrating that the Council seeks and listens to the views of its residents (by Putting Residents First).

## **Section 3 - Statutory Officer Clearance**

### **Statutory Officer: Jessie Man**

Signed on behalf of the Chief Financial Officer

**Date:** 27/06/2023

### **Statutory Officer: Jimmy Walsh**

Signed on behalf of the Monitoring Officer

**Date:** 27/06/2023

### **Corporate Director: Dipti Patel**

Signed by Corporate Director

**Date:** 28 June 2023

### **Chief Officer:**

Signed off by the Chief Planning Officer

A handwritten signature in black ink that reads "V. Evans". The signature is written in a cursive style with a large initial 'V' and a period at the end.

**Date:** 29 June 2023

### **Head of Procurement: Nimesh Mehta**

Signed on behalf of the Head of Procurement

**Date:** 27/06/2023

### **Head of Internal Audit: Neale Burns**

Signed by the Head of Internal Audit

Date: 27/06/2023

## **Mandatory Checks**

**Ward Councillors notified: NO – impacts all wards**

**EqlA carried out: NO - see above**

If 'NO' state why an EqlA is not required for Cabinet to take a decision

**EqlA cleared by: N/A**

## **Section 4 - Contact Details and Background Papers**

**Contact:** Lucy Haile, Principal Conservation Officer,  
lucy.haile@harrow.gov.uk

### **Background Papers:**

Historic England: 'Local Heritage Listing Historic England Advice Note 7' (2<sup>nd</sup> edition) - <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

Harrow Conservation Areas and Supplementary Planning Documents (SPDs) - <https://www.harrow.gov.uk/planning-developments/biodiversity-conservation>

Report to Planning Policy Advisory Panel – 3<sup>rd</sup> March 2023 - [Agenda for Planning Policy Advisory Panel on Monday 6 March 2023, 6.30 pm – Harrow Council](#)

## Appendix 1 – Responses to informal consultation

Date of response	Name of respondent	Response
1) 22/04/2023	Trevor Gray	<p>This proposal sounds worthy of support and I will raise it with The Stanmore Society committee. I am sure we have a number of areas in Stanmore we would wish to put forward for such a designation.</p> <p>Hopefully, we will be able to get comments to you in support ahead of 19 May.</p>
2) 26/04/2023	Victorian Society	<p>Thank you for making the Victorian Society aware of Harrow Borough Council's intention to designate 'Areas of Special Character'. This is a salutary way of extending the principle of local listing and it is encouraging sign of the value placed on heritage by your department. We would make no comments on the proposed criteria which seems wide ranging enough to encompass various areas. However, we would appreciate to be updated as the designation is implemented and how this will affect planning decisions.</p>
3) 27/04/2023	Alan Flint	<p>I have read the proposal of adding Areas of Special Character to the Planning portfolio. I have just completed 20 years as a member of the CAAC, representing the Pinnerwood Park Area. Whilst I believe this to be a laudable addition I do foresee a few problems, and these are a few thoughts you may wish to consider.</p> <ol style="list-style-type: none"> <li>1. Will the residents of the areas/roads/properties be consulted and have a vote as to whether they wish to be part of this? The Council did organize a meeting for Pinnerwood Park in 1989, and having heard all the pros and cons from the Planning Officers the residents voted in favour.</li> <li>2. Will this new scheme come under the office of the Conservation Officer? If so there are 29 Conservation Areas in Harrow so I believe this additional workload would mean extra personnel being required in that department.</li> <li>3. There will no doubt be demands made on the Enforcement Department. I and others have found it very difficult to get responses from this department. For example, on the 11<sup>th</sup> November last year I drew attention to all new windows on the front elevation of a property in this area which were incorrect. I received an Enforcement number. On 21<sup>st</sup> March this year, as nothing appeared to be happening and I</li> </ol>

Date of response	Name of respondent	Response
		<p>had had no response, I requested and update. Still no response, so on 21<sup>st</sup> April I sent another request for a response. I still have not had a reply. This appears to another department in need of extra personnel even without this extra responsibility.</p> <p>4. Will this in any way involve the CAAC for comments?</p> <p>I would appreciate these points being taken into consideration when any decision is made.</p>
4) 2/05/2023	Historic England	<p>Thank you for consulting Historic England on the London Borough of Harrow’s proposal to designate “areas of special character.</p> <p>Accordingly, we have reviewed the consultation documents in light of the <i>National Planning Policy Framework</i> (NPPF, 2019) which requires, as one of its core objectives, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>The proposal will, in effect, formally identify areas of local heritage character as “non-heritage assets” and therefore align these to the relevant considerations set out in NPPF (specifically policy 203). The methodology and justification for the proposal is set out clearly in the accompanying <i>Report to the Planning Policy Advisory Panel</i>, dated 23 March 2023. We are pleased to note that the report has been prepared with reference to our published guidance on <i>The Designation of Local Heritage Listing</i> (Heritage Advice Note No.7) and in our view the proposal will provide a positive tool for the managing of local heritage assets. As such we consider the proposal to be in conformity with the NPPF requirement to conserve heritage assets in a manner appropriate to their significance and to plan positively for the management of the historic environment.</p> <p>In order to provide a robust tool for planning decisions we would also recommend that the area-based assessments are subject to a clear summary report process which sets out the reasons for designation the significance of the area and the character of which it is desirable to preserve. These reports should be made publicly accessible on the Council’s website and the Heritage Environment Record. Further detailed advice</p>

Date of response	Name of respondent	Response
		<p>on producing and publishing the list is set out in our Heritage Advice Note No.7.</p> <p>We hope you find the above observations helpful. If you wish to discuss the above comments. please do not hesitate to contact me.</p> <p>It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.</p>
5) 16/05/2023	John Cobb Planning representative on behalf of the Hatch End Association	<p>The email appended below was forwarded by the Hatch End Association representatives on the Conservation Area within Hatch End and Pinner. I am writing to provide comments specific to Hatch End as a “village” within Harrow. Hatch End became a suburban area in the 1870’s onwards (Victorian/Edwardian) well before most of Metropolitan Harrow as developed after the first world war.</p> <p>Hatch End already has a conservation area and listed buildings (such as Hatch End Station, Letchford House and the Harrow Arts Centre).</p> <p>However, areas of Hatch End are often used to portray the best of green suburbia within Harrow and although built up over many years retains its charm and representative of high-quality suburban life. Given they comprise mixed residential housing from the Victorian era to the present day they have never qualified as conservation areas. However, they do represent the special character of Hatch End.</p> <p>The points below represent feedback from the Committee of the Hatch End Association. They apply to the whole of Hatch End (apart from the existing conservation areas). However, areas of particular note are those originating in Edwardian times as original streets were developed. Examples are:</p> <ul style="list-style-type: none"> <li>• The Royston Park Estate including the later developments of Rowlands Avenue, Furham Field and Sherington Avenue.</li> <li>• St Anselms Road, Wellington Road, Woodridings Avenue, Hillview Road.</li> <li>• Grimsdyle ditch from Oxhey Lane through to Woodridings Close (Footpath 129)</li> <li>•</li> </ul> <p>These areas represent mature low density living in mainly tree lined avenues with interlinking footpaths following the original field lines. Many original field</p>

Date of response	Name of respondent	Response
		<p>trees (large oaks) remain plus parkland trees such as Sequoias and other specimen trees.</p> <p>We would request that you consider the following key points for Hatch End as a whole community:</p> <ol style="list-style-type: none"> <li>1. The maintenance of relatively low-density housing with good spacing between buildings. This would restrict new extensions being built boundary to boundary converting detached houses into what becomes terraced roads with only a few centimetres between them.</li> <li>2. A predisposition against houses being converted into flats in residential roads.</li> <li>3. Management of the scale of the existing buildings and careful assessment and qualification of applications for additional storeys under permitted development that would not match the existing street scene.</li> <li>4. Adherence to new housing or extensions that reasonably match the existing styles and materials (particularly gables and roof tiles) within the roads.</li> <li>5. Preservation of off-street parking but balanced by giving an emphasis on “green” front gardens rather than fully paved front drives, plus pedestrian friendly front boundaries and access arrangements.</li> <li>6. Preservation and maintenance of the existing Avenues of mature trees and the green verges.</li> <li>7. Preservation and maintenance of rights of way and particularly the footpaths within Hatch End.</li> <li>8. Preservation and maintenance of the existing open spaces and parks within Hatch End.</li> </ol> <p>I would be most grateful if you could take these points forwards as part of your ‘Areas of Special Character’ policy for Hatch End.</p>
6) 16/05/2023	Matthew Saunders	<p>The email below has reached me via the Joint Committee casework hub.</p> <p>I am replying in a personal capacity as author of The Saunders Report now available online at</p> <p><a href="https://historicengland.org.uk/research/results/reports/27-2021">https://historicengland.org.uk/research/results/reports/27-2021</a></p> <p>As my principal object there was the study of listing, I only deal with Conservation Areas peripherally but you may find the brief mention (page 41 ) puts your proposal in context.</p>



Date of response	Name of respondent	Response
		<p>I didn't mean to be dismissive of other forms of area protection by the phrase "Conservation Area Lite" but I was very struck by the number of subsets that I found. I only mentioned 3 ("Heritage Area", "Area of Traditional Character" and "Identity Areas" ) but could easily have quadrupled that list with a multiplicity of headings.</p> <p>I welcome the clear differentiation in your excellent paper between the proposed new category and the Conservation Area, the latter being recognised as the stronger means of exercising control ( particularly with an Article 4 ). I do think that that hierarchy is vital.</p>
7) 22/05/2023	Conservation Area Advisory Committee	<ul style="list-style-type: none"> <li>• Christine Wallace commented on the consultation regarding Local Areas of Special Character:</li> <li>• Noted that the proposed criterion regarding 'identification of areas of heritage significance' seems difficult. What would this mean?</li> <li>• John Orchard: What area would be an area of special character in Harrow? They are all designated as conservation areas.</li> <li>• John Orchard: West Harrow Village perhaps? This area was turned down for designation as a conservation area.</li> <li>• Pat Clarke: Pat Clarke The oldest part of West End Avenue is very cohesive and mostly built by World War I. They have interesting porches window-heads etc. Some porches have gone, many windows have been changed, many original front walls have come down.</li> <li>• Meadow Road, Pinner too perhaps.</li> <li>• Both are areas of classic Metroland and you know the architect ie Henderson</li> <li>• Is Cuckoo Hill Road by the same architect?</li> <li>• Paul Catherall via email: We already have an Area of Special Character in Harrow. Historically it was very often not mentioned in officer's reports and also not mentioned in planning permission refusals which was frustrating as there is a DM policy specially for it, namely DM6. We always seek</li> </ul>

Date of response	Name of respondent	Response
		<p>to mention it in our HHT letters and matters have improved with it now being mentioned in officer reports in recent years. It basically covers the conservation areas, but it covers almost all of the Hill including the 'islands' excluded from conservation areas. Hence it is useful to try to stop those non-conservation areas from becoming even worse.</p> <ul style="list-style-type: none"> <li>• Overall CAAC noted the LASCs would be a useful designation.</li> </ul>