



**Report for: Planning Policy
Advisory Panel**

Date of Meeting:	8 th October 2024
Subject:	Local Areas of Special Character – outcomes of consultation on the two proposed areas within West Harrow and Pinner
Key Decision:	No – advisory panel
Responsible Officer:	Viv Evans, Chief Planning Officer
Portfolio Holder:	Councillor Marilyn Ashton, Deputy Leader of the Council, Planning & Regeneration Portfolio Holder
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	All
Enclosures:	Appendix 1 – Consultation responses (received by email) (July-September 2024) Appendix 2 – Maps of Areas Proposed for Adoption

Section 1 – Summary and Recommendations

The Planning Policy Advisory Panel considered two proposed Local Areas of Special Character (LASC) at its meeting on 21st March 2024 and commended them for public consultation. This report feeds back representations received to consultation on the proposed areas and recommends one minor change to proposed area arising from this. It then recommends that the Panel commends the areas to Cabinet for adoption.

Recommendations:

The Planning Policy Advisory Panel is requested to:

- (A) consider the consultation responses on the two proposed 'Local Areas of Special Character' summarised in section 5 below and at Appendix 1; and
- (B) recommend to Cabinet that the areas shown in Appendix 2, are adopted namely: in West Harrow: 3-29 (odd) and 2-40 (even) Butler Avenue and 2-26 (even), 1-33 (odd) Lance Road and West Harrow Recreation Ground, and in Pinner: 1 and 3 - 38 (all) West End Avenue, 1-40 (all) Meadow Road and 24-38 (even) Eastcote Road.

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 of two LASC. These proposed areas are 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 two Local Areas of Special Character [LASC] be confirmed, this 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 implementing the outcome of the character assessment of the areas and subsequent consultation on the proposal to introduce these areas as LASC was considered but this would be contrary to the obligations placed on the Council under the NPPF which states in paragraph 198 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 LASC 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 meetings on 6th March 2023 and 21st March 2024, agreed to the principle and criteria respectively to a new local heritage designation of: LASC, 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 is that once designated this 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 209 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'.

Criteria for designation

- 3.2 The adopted criteria are:
- 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.

- 3.3 In December 2023, the NPPF was updated. The definition of 'heritage significance' did not change within it so the above is unaffected. The draft proposed changes to the NPPF currently being consulted on also do not propose any changes to the definition / heritage provisions.

What areas to consider for designation?

- 3.4 During the public consultation undertaken March to April 2023 regarding the proposed criteria for the designation of LASC, a number of areas were suggested by respondents for consideration. One comprised parts of Butler Avenue, Lance Road, and West Harrow Recreation Ground (West Harrow), whilst the other area comprised the eastern half of West End Avenue and Meadow Road, and 24-38 (even) Eastcote Road (Pinner).
- 3.5 Since then others have been suggested for consideration. Where there is a high concentration of locally listed buildings, further areas have also been identified as potential LASCs for review. Areas will be considered in due course.

What areas have been subject to public consultation for designation?

- 3.6 The West Harrow and Pinner areas were commended to Cabinet by the Panel for consultation as potential LASC at their meeting on 21st March 2024, with the outcomes of the consultation to be reported back to the Panel and Cabinet.

Pinner: Why was the Eastern half of West End Avenue and Meadow Road, and 24-38 (even) Eastcote Road proposed?

- 3.7 This is outlined in full within the report to the Planning Policy Advisory Panel on 21st March 2024 (see background papers). In summary: The Edwardian and pre-World War I houses along 1-38 Meadow Road and 24-38 Eastcote Road and 1-39 (odd) and 4-40 (even) West End Avenue have a locally cohesive and well-preserved townscape and architectural quality, that is not found in surrounding roads. It has historic interest as early (pre-1914) speculative housing built following the arrival of Pinner Station. It was recommended that the area be taken forward for consultation as a LASC.

West Harrow: Why was Butler Avenue, Lance Road and West Harrow Recreation Ground proposed?

- 3.8 Based on the site and photographic survey, local history search and consideration of the criteria for designating a LASC, it was concluded that numbers 3-29 (odd) and 2-40 (even) Butler Avenue and 2-26 (even) and 1-33 (odd) Lance Road and West Harrow Recreation Ground should be recommended for consultation as a LASC as:
- (a) There is a relatively strong locally cohesive, well-preserved quality to the townscape and architecture given the high concentration of consistently good quality decorative Victorian architecture. In Butler Avenue this comprises red brick detached houses/maisonettes of a single type and Edwardian terraced houses of a single type including a two-storey bay window. These feature relatively consistent and good quality decorative features such as delicate timber windows, front doors, gauged brickwork detail, open porches with carved timber work and applied black timber and white render detail and moulded and gauged brickwork. In Lance Road this is terraced red brick two storey cottages with some original timber sash windows, and consistent porch and bay window details. The extent of alterations is too high and consistent for conservation area status but there is nevertheless a local distinctiveness and cohesion to an original quality and distinction of design that ensures the street stands out from surrounding ones.
 - (b) This area has additional historic merit given the association with the Harrow School masters who the streets are named after.
 - (c) West Harrow Recreation Ground retains some of its original 1920s layout and features marking it out to an extent versus some other public green spaces in Harrow.

4.0 Process and timeframes for consultation undertaken

- 4.1 There are no statutory requirements to consult. In line with best practice, this took place for eight weeks from 8th July to 3rd September (consultation was deferred due to the calling of the General Election). At least one site notice was placed in each street or public recreation ground within the proposed areas. Emails were sent to the local and national heritage groups and letters sent to each owner/occupier. The local and national heritage groups comprised:

- the Harrow's Conservation Area Advisory Committee.
- West Harrow Community Forum
- Pinner Association
- Pinner Local History Society
- Society for the Protection of Ancient Buildings
- Victorian Society

- Georgian Group
- Twentieth Century Society
- Gardens Trust
- Council for British Archaeology
- Historic England

4.2 The email, letter, and site notice each provided a link to the Council's engagement website (MyHarrow Talk) which contained further details (including the full assessment of the areas i.e. this report) and a short survey.

5.0 Responses to consultation process

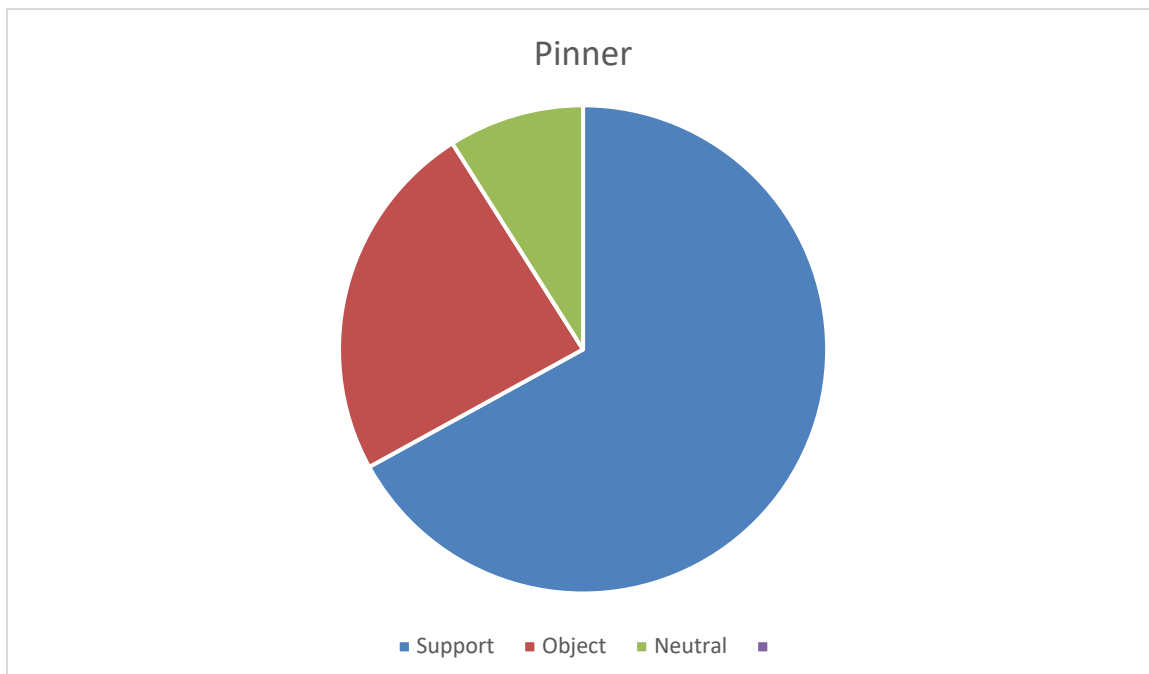
5.1 These are summarised below, including those received by email and those received online via the MyHarrow Talk webpage. Appendix 1 provides further detail with respect to responses received by email.

5.2 In total, 55 responses were received including one each from Historic England, Conservation Area Advisory Committee, West Harrow Forum, and Pinner Local History Society. 14 responses were received by email and 41 by the 'MyHarrowTalk.gov.uk' online survey.

5.3 Of email replies, nine related just to Pinner, three (including one petition signed by 63 people) just to West Harrow and two to both. Of the online survey replies, 21 related just to Pinner, 15 just to West Harrow and two to both.

Pinner

5.4 For Pinner, of the emailed replies, six were in support the proposed inclusion of the area as a Local Area of Special Character, two objected/raised concerns and three replies were neutral. Of the online survey, 17 replies supported the proposed inclusion of the area as a Local Area of Special Character and 6 objected. One expressed strong support for inclusion and another thanked the Council. In total then, of the 34 replies concerning Pinner, 68% support the proposed designation (including Historic England, the Conservation Area Advisory Committee, and Pinner Local History Society), whilst 24% object and 8% were neutral (see pie chart below).



Support

- 5.5 Historic England's response raised their support for proposals. They noted the conformity with the NPPF's requirements for: a positive strategy for the conservation of the historic environment; up to date evidence against which to assess significance; and a clear definition of significance. Historic England note any such areas should be assessed using local expertise, against clear and consistent criteria and that designation is supported by a clear statement of significance (referring to their Advice Note 7 in relation to Local Listing: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>). Historic England state the areas potentially fall short of conservation area status but that the analysis undertaken 'represents a very thorough and clear assessment of the character and appearance of the areas.
- 5.6 The Conservation Area Advisory Committee stated they consider the area worthy of designation and the Pinner Local History Society stated they fully support proposals. The Pinner Association enclosed a document providing additional history concerning the heritage value of Meadow Road: 'Diamond Jubilee and Meadow Road – 100 years', which another resident refers to in providing supporting information for designation.
- 5.7 Reasons given for the support by other respondents include: houses being well designed; protecting cultural and architectural heritage; council will ensure alterations are in keeping; identifying and preserving local architectural features; unsightly changes e.g. plastic windows/doors; rendering of Victorian to early 20th century brick properties has blighted character; Meadow Road is special with a unique consistent look; borough has become concrete jungle; try to preserve beauty; Meadow Road on cusp of losing character; and protection needed for Meadow Road's house fronts, drives and gardens.

Objections/concerns

- 5.8 Reasons given for objections are: planning restrictions are unclear; planning judgements would be subjective; how would LASCs be put into practice; can it accommodate technologies e.g. solar panels, heat pumps; this would give residents an excuse to suppress housing supply and increase costs; would will increase bureaucracy and related costs for owners; feels too late e.g. modern house with black windows, bungalow style opposite; disagree with the LASC restrictions and added costs and seems too late – many houses already have knocked down front walls, paved drives or changed windows, so, why not let others also? Residents would resent this. Only about 5 have not had loft extensions. Questions raised were: what constraints will be applied? What guidelines? How will this be enforced?
- 5.9 One respondent wrote that despite their support for the proposal, they only considered it a 'maybe' that the criteria for the designation of LASC was met.

Should a Wider Area be Designated?

- 5.10 Of those commenting about Pinner, eleven replied to the online survey's question as to whether other areas should be included in the Local Area of Special Character. Most who replied to this query did not propose broadening the area. Four stated the area should not be widened, one noting that it should not be until the criteria are clearer. One replied 'no strong feelings' on the matter and another replied 'not sure'.
- 5.11 Four said other areas should be included and one said 'probably' they should but it 'depends on what they look like'. Areas named were: Cecil Park, Elm Park Road, Love Lane, Paines Lane, Waxwell Lane, Grange Gardens, High View, West End Lane, West Way, North Way, Church Lane, High Street, Northfield [sic] Ave, Wentworth Way, Cuckoo Hill Road, Cuckoo Hill Cranbourne, Rochester, Winchester Malpa [sic], High Street Pinner, Moss Lane, Church Lane, Pinner Memorial park, West End Avenue to the junction of Marsh Road should be included in the LASC was named 'as it is the appearance of the avenue as a whole which gives the area its character as well as the individual houses'.

Discrepancy in map and list of properties upon consultation

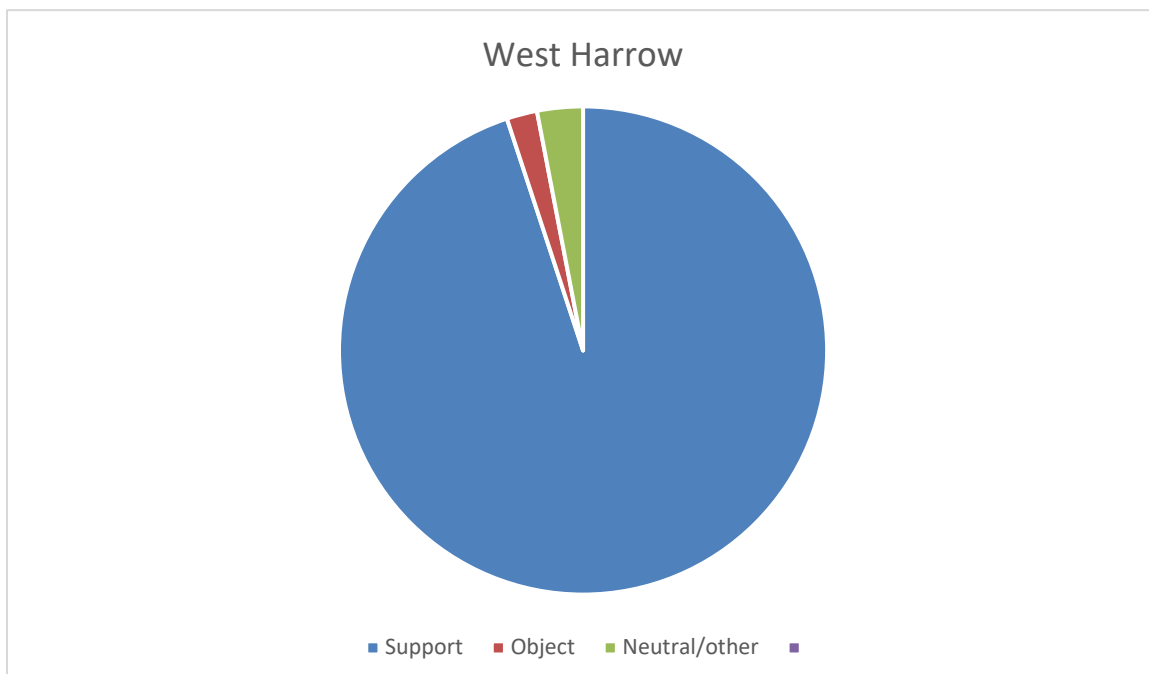
- 5.12 A respondent noted that houses numbered 1-40 of Meadow Road (all) were listed as houses to be sited within the proposed LASC, but the map provided did not include numbers 39 or 40. These two properties have been written to by letter indicating that their inclusion on the proposed list was an error and that there is no intention to include them. Two weeks were given for a response and a verbal update will be provided at the Panel's meeting. The proposed houses on Meadow Road within the LASC are then number 1-38 rather than 1-40.

Other

- 5.13 Other general comments were: changes to granite pavement edges has been harmful with Highways works; desire to keep granite in the area; and along West End Avenue how about continuing the pavement renewal? The comments reading paving works have been passed to the Highways Team. They have confirmed that they will retain the granite kerbs in the area.

West Harrow

- 5.14 For West Harrow, of the emailed replies, most were in support of the proposed inclusion of the area as a Local Area of Special Character (three plus a petition of support signed by 63 people). Otherwise, two responses were neutral. Similarly, of the online survey, the majority (15) supported the proposed inclusion of the area as a Local Area of Special Character. Otherwise, two objected/raised concerns and one noted that 'it depends'. In total then, of the 86 replies concerning West Harrow, 94% support the proposed inclusion of the area as a Local Area of Special Character, 4% were neutral/noted 'it depends' and 2% objected or raised concerns (see pie chart below).



Support

- 5.15 Historic England and the Conservation Area Advisory Committee responded with their support for the proposal as per paragraphs 5.5 and 5.6 above.
- 5.16 The West Harrow Forum replied that comments were 'unanimously' positive when they: 'discussed this proposal at a recent community meeting and held extensive informal conversations with much wider groups at the July

community party in West Harrow park'. They enclosed a petition of support whose cover letter stated:

'We the undersigned are in favour of Harrow's current plan to recognise parts of West Harrow as Areas of Special Character. Furthermore, we would ask the council to actively consider extending their proposal beyond Butler Avenue, Lance Road, and the Park. We believe that it would be appropriate to consider a wider area of West Harrow given that it was all developed from the mid 1890s up until the beginning of the First World War and remains substantially unaltered.'

- 5.17 Otherwise, support for the designation referenced: the double fronted Edwardian exteriors, connection and history with Harrow school should be celebrated on Butler Ave; looking forward to the council taking an interest in the quality of the environment and ensuring the home improvements are in keeping and this allowing a level of monitoring regarding what is allowed to the local aesthetics.
- 5.18 One respondent noted that their support is conditional on the Council approving electric vehicle charging infrastructure lampposts in the road as there are none (or permitting home charger use) and confirming there will be no new restrictions due to an LASC designation on energy efficient home improvements e.g. solar panels, heat pumps, air source heat pumps.

Objections

- 5.19 Objectors noted: housing is greatly needed, and prices have increased designation allows residents to suppress supply; neither Butler Avenue or Lance Road is pretty enough, and West Harrow Recreation Ground has a lot of potential for improvement which shouldn't be hindered.

Wider area

- 5.20 The petition asked 'the council to actively consider extending their proposal beyond Butler Avenue, Lance Road, and the Park. We believe that it would be appropriate to consider a wider area of West Harrow given that it was all developed from the mid-1890s up until the beginning of the First World War and remains substantially unaltered.' It was requested it be considered in a second phase of the LASC rollout. The cohesion of design gives the wider area its special character. Another respondent asked why the Local Area of Special Character is 'restricted to three such small areas of the wider historic community?' Twelve replied to the online survey's query as to whether other areas should be included in the Local Area of Special Character. Eleven replied 'yes', with one more stating 'probably', whilst just one stated none should be as 'there are roads in West Harrow which look a lot better and are therefore more worthy of protection than what is being proposed'.
- 5.21 Comments of support for a broader area being included in the Local Area of Special Character were that: the wider area is similarly unchanged and cohesive; it would encourage harmonious development; some neighbourhoods of Edwardian houses haven't been subdivided; it is an issue

to allow change without consideration of historic character and too many buildings are being ruined with poor unsympathetic design.

- 5.22 Areas suggested as other LASC: wider area of historic West Harrow (Butler Road, Vaughan Road, Sumner Road, Bowen Road, Merivale Road, Sumner Road, Heath Road, Drury Road), areas nearby with early 20th century architecture e.g. The Gardens, all Edwardian and Victorian houses of West Harrow and another suggested most of West Harrow. It was queried why 1 Butler Avenue is not included.

Other

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

Consultation response	Council response
1) Where are the earlier assessments for all the Edwardian streets referenced in the report? No evidence of this.	The Council undertook an assessment of a broader area to identify which areas met the criteria as LASC, before consulting on the proposed areas. These can be found in the background papers accompanying this report.
2) Driving app 'shortcuts' send far too much traffic through West Harrow, including Butler Av. Additional traffic controls such as ANPR filtering would help preserve the area's special character. Also recommending low-cost hides for unsightly wheelie bins.	This comment has been passed to our Highways department.
3) Please start enforcing the laws regarding littering, fly tipping, anti-social behaviour, and illegal parking.	This comment has been passed to our Parking and Environmental Health Departments.
4) LASC status should be marked out with street signage.	This request is noted. It would add to street clutter which could have a deleterious impact on the streetscene. Conservation Areas are not distinguished in this way.
5) The missing street trees in the LASC areas should be replanted	This comment has been passed to the Highways Trees team.
6) What is the difference between a conservation area and a LASC?	A Conservation Area provides national statutory protection (and has a higher threshold of historic and architectural significance for designation), whereas a Local Area of Special Character is a local planning designation only.

Consultation response	Council response
7) What in practical terms does the LASC designation mean to the park?	Designation would not change the requirements for planning permission. If a planning application is submitted preserving the local heritage merit would be a factor in considering appropriateness in the planning balance. Any works within the park would need to have regard to its historic significance (i.e. layout, remaining original features).
8) For Lance Road, would the following works still be acceptable: replacement door/windows, front porch, replacement front wall, solar panels on the roof, air source heat pump, charging points for EVs in lamp posts, reinstating tiled front paths.	Designation would not change the requirements for planning permission. These works could likely be undertaken without the need for planning permission subject to meeting the relevant requirements / parameters for this. If planning permission were needed, a balanced judgement would be needed in line with policy taking account of sustainability gains versus any harm to character (as identified by the area's designation as a LASC).
9) Would grants be available as a result of an LASC designation?	The Council do not hold any grants that would be available upon designation.

6.0 Recommendations for proposed areas for designation following consultation

Pinner

Appraisal of responses

- 6.1 The majority support for the designation is noted (68%), including the support from Historic England and the Conservation Area Advisory Committee. Both agree that the criteria for designation is met and Historic England note designation would comply with the NPPF's requirements regarding local heritage. The Pinner Local History Society's support for the proposal is noted, as is the supporting document from the Pinner Association from 2012 which expands and reinforces understanding of the historic development of Meadow Road since its origins in the 1880s, and its character. It outlines its growth related to the Metropolitan Railway by architect JE Henderson built as semi-detached houses for middle class families, and architectural details such as 40- and 50-degree roofs, ridge tile stopper and decorative base to oriel windows, historic drain cover in the pavements and some Arts and Crafts detailing to windows.
- 6.2 A resident noted this shows 'historical aspects of Meadow Road dating as far back as 1908 when it was a picnic ground and a photo from 1910 showing the

first houses being built with examples of original fixtures and fittings still in our houses today' and a lifestyle record of the residents some of whom would have had servants and Mabel Wilkinson of no 7 who participated in the suffragette movement and was imprisoned along with others for smashing windows in the West End in 1912. A resident noted the book Metro-Land (1924 edition) published in association with London's Transport Museum has a photo of Meadow Road on page 42 showing the road as an example of the Metro-land beginnings. Other reasons for support relate to the desire to help protect the area and recognise local character and prevent harmful changes.

- 6.3 The objections are noted and addressed here.
- 6.4 A principal concern related to what designation would mean in practice (partly for energy efficiency measures), the introduction of bureaucracy, costs, housing supply suppression, and subjective decisions on suitability and queries regarding guidelines for the area and how designation would be enforced. It should be noted that designation would not introduce any new requirements for planning permission. Installation of energy efficiency measures currently covered by permitted development rights would still be able to be installed without recourse to the Local Planning Authority e.g. solar panels, heat pumps, would remain so. Where a planning application is submitted, designation would mean that a balanced judgement would be required to be taken with regards to the nature of the proposal and its impact on the heritage value of the area in line with NPPF paragraph 209 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.'*
- 6.5 Any breaches of planning decisions would be subject to the usual Planning Enforcement measures just with the additional consideration that the area has Local Heritage value and the need for this balanced judgement in accordance with the NPPF paragraph 209. Guidelines for designation would be provided on the Council's webpages along with reference to the individual designation reports taken to Planning Policy Advisory Panel and Cabinet.
- 6.6 Other concerns related to the designation being too late given changes already in place e.g. window replacement. However, it is for this reason that the area is not proposed as a Conservation Area and the manner in which the area meets local designation criteria has been set out, which Historic England support. The NPPF, Planning Practice Guidance and the Historic England Local Heritage Listing Advice Note 7 require that there be an up-to-date recognition of heritage assets supported by good evidence.

Should a wider area be considered?

- 6.7 Only 11 of 34 replies commented on this. The majority of responses on this question were not in support of a broader area being included. However, the other areas in Pinner and surrounding area suggested are noted. Many of these are already designated Conservation Areas or Locally Listed Park and Garden (in whole or in part). Otherwise, areas named were Grange Gardens, High View, West End Lane, West Way, North Way, Northfield [sic] Ave, Wentworth Way, Cuckoo Hill Road, Cuckoo Hill Cranbourne, Rochester, Winchester Malpa [sic], West End Avenue to the junction of Marsh Road. These areas are noted and will be added to the list of areas to consider in future.

Recommendation

- 6.8 It is considered that the area proposed as a LASC should be designated with one minor amendment to the proposed boundary i.e. omit numbers 39 and 40 Meadow Road which were erroneously included in the list of properties. The residents in these houses have been notified.

West Harrow

Appraisal of responses

- 6.9 The overwhelming support for the designation is noted (94%), including the support from Historic England, the Conservation Area Advisory Committee and West Harrow Community Forum. Both Historic England and the Conservation Area Advisory Committee agree that the criteria for designation is met and Historic England note designation would comply with the NPPF's requirements regarding local heritage. In general, support for the designation referenced: desire to protect the double fronted Edwardian exteriors, connection to Harrow School and that recognition of heritage value would help with preserving this.
- 6.10 One respondent noted that their support is conditional on the Council approving electric vehicle charging infrastructure lampposts in the road as there are none (or permitting home charger use) and confirming there will be no new restrictions due to an LASC designation on energy efficient home improvements e.g. solar panels, heat pumps, air source heat pumps.

Objections

- 6.11 The objections are noted and addressed here. First that the designation would restrict housing supply. However, given the nature of existing terraced housing development that is proposed to be designated as a Local Area of Special Character, it is unlikely that designation would impact housing supply. Second, a concern that Butler Avenue and Lance Road are 'not pretty enough', however, the ways in which the local criteria are considered to be met are set out above. Lastly that West Harrow Recreation Ground potential for

improvement shouldn't be hindered. It should be noted that designation would not introduce any additional requirements for planning permission. Where a planning application is submitted, designation would mean that a balanced judgement would be required to be taken with regards to the nature of the proposal and its impact on the heritage value of the area in line with NPPF paragraph 209 (see paragraph 6.5 above).

Should a wider area be considered?

- 6.12 In total 74 responses requested a broader area of West Harrow be considered for designation with a further one stating it 'probably' should be considered. It was noted that this is: 'given that it was all developed from the mid-1890s up until the beginning of the First World War and remains substantially unaltered'. Reference is made to architectural cohesion. Named streets were Butler Road, Vaughan Road, Sumner Road, Bowen Road, Merivale Road, Sumner Road, Heath Road, Drury Road, The Gardens,
- 6.13 Given local interest, a broader area has been surveyed. This area comprised: Butler Road, Vaughan Road, Sumner Road, Bowen Road, Merivale Road, Sumner Road, Heath Road, and Drury Road. Attention was given to a wider area of West Harrow more generally. The area was surveyed in relation to the adopted criteria for designation of a Local Area of Special Character (paragraph 3.2 above) and due regard to local history research which found historic photographs and OS maps of these streets as originally constructed and determined their date of origin being turn of the century.
- 6.14 Inspection found that houses in these streets, whilst pleasing Metroland for which Harrow is famed, were either more altered and/or without the same distinctive decorative architectural features and design as the proposed LASC areas, to distinguish them from any other street in Harrow. Their heritage significance relative to other streets within Harrow cannot then be clearly defined, contrary to the NPPF requirement of paragraph 209 that for local heritage assets a clear definition of significance should be defined, against which planning proposals can be weighed. Consequently, designation of such streets would undermine the value of the recently introduced designation 'Local Area of Special Character', such that its intention and purpose could not be fulfilled.
- 6.15 Designation would then also be contrary to Historic England's consultation response which notes: 'Our principal recommendation is that local heritage assets should be assessed against clear and consistent criteria and that any designation is supported by a clear statement of significance' using 'local using 'local expertise' and an 'understanding of local heritage'. It would conflict with their adopted Advice Note 7 regarding Local Heritage Listing which states: 'nominations need to be backed by information of sufficient detail and accuracy to demonstrate that they meet the requirements set by the selection criteria and by national planning policy'.
- 6.16 It was otherwise questioned by one resident why 1 Butler Avenue is not included. It was noted upon inspection of the street that it has a large two

modern storey side addition along with complete front garden hardstanding and loss of most of the front boundary wall. The proposed designation has focused on a coherent and cohesive grouping that is less interrupted by modern additions or alterations. Houses of a similar Edwardian age with similar noticeable alterations are similarly omitted at the other end of Butler Avenue.

Recommendation

- 6.17 It is recommended that the proposed LASC be adopted without change to the proposed boundary.

7.0 Next Steps

- 7.1 It is intended that the feedback from the Panel on the recommendations of this report to note the consultation responses and recommend the proposed LASCs for adoption will be presented to Cabinet before the end of 2024. 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 are 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 It is noted that this consultation process has resulted in a number of further suggestions for possible LASC as outlined in paragraph 5.11 and 5.22 above. Some have been considered in this report (paragraphs 6.7 and 6.12-6.17 above). Others will be considered in due course. 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 designated LASCs 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 designations 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 – Relevant ward members will be notified of this report once it is published.

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"> ▪ There are no statutory consultation requirements. ▪ Appropriate requirements were reviewed (i.e. Harrow's Statement of Community Involvement) and followed where relevant. ▪ Any 'minimum' standards were exceeded (i.e. emails to 6 national amenity societies and to the Conservation Area Advisory Committee). 	GREEN
The agreement of the LASC is later challenged	<ul style="list-style-type: none"> ▪ This report shows how designation relates 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. ▪ Consultation was undertaken and responses (including support from Historic England) informed the final recommendation. 	GREEN
The additional areas to consider as LASC that this report highlights with insufficient conservation	<ul style="list-style-type: none"> ▪ Whilst a programme for assessment cannot be committed to at this stage the matter will be kept under review, and areas assessed where possible. 	GREEN

Risk Description	Mitigations	RAG Status
resources to assess them	<ul style="list-style-type: none"> ▪ Awareness by the Local Planning Authority (LPA) of potential areas for consideration for LASCs is helpful. Should a planning application be received that would affect an area considered to be of heritage 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 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 parts determined not to be Conservation Areas but still good examples of areas of local heritage value are recognised as Local Areas of Special Character. This is in accordance with the NPPF paragraph 198'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'.

This report and recommendation is going to the Planning Policy Advisory Panel by virtue of the delegated power granted to the Panel by the Council's Constitution under part 3, page 40, para 2: "2. To provide input into all other planning policy matters such as the designation of Conservation Areas and amendments to their boundaries and the designation of locally listed buildings". The Planning Policy Advisory Panel is appointed by the Executive to assist the Executive by making recommendations on any matters within their terms of reference.

Financial Implications

The costs of appraising the two areas and progressing the recommendations and subsequent consultation (and if agreed, designation) have been met from within the existing revenue budgets of the Council's Planning Policy team.

Equalities implications / Public Sector Equality Duty

Was an Equality Impact Assessment carried out? No

EqlA 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 LASC 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: Sundas Aslam

Signed on behalf of the Chief Legal Officer

Date: 25th September 2024

Statutory Officer: Archa Campbell

Signed on behalf of the Chief Financial Officer

Date: 24th September 2024

Chief Officer: Viv Evans

Signed by Chief Planning Officer

Date: 19th September 2024

Acting Strategic Director: Emma Talbot

Signed by Acting Strategic Director for Housing and Regeneration

s

Date: 20th September 2024

Mandatory Checks

Ward Councillors notified: Yes – see above

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' (2nd 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 – 3rd March 2023 - [Agenda for Planning Policy Advisory Panel on Monday 6 March 2023, 6.30 pm – Harrow Council](#)

Report to Planning Policy Advisory Panel – 13th July 2023 [Agenda for Planning Policy Advisory Panel on Thursday 13 July 2023, 6.30 pm – London Borough of Harrow](#)

Report to Planning Policy Advisory Panel – 21st March 2024 - [Agenda for Planning Policy Advisory Panel on Thursday 21 March 2024, 6.30 pm – London Borough of Harrow](#)


Cabinet – 14th September 2023 - [Agenda for Cabinet on Thursday 14 September 2023, 6.30 pm – London Borough of Harrow](#)

Cabinet – 21st May 2024 - [Agenda for Cabinet on Tuesday 21 May 2024, 6.30 pm – London Borough of Harrow](#)

Appendix 1 - Consultation responses (received by email) (July-September 2024)

Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
1) 9/07/2024	M.W.	Who will be consulted on the park and what would designation mean for it?	Neutral	West Harrow
2) 9/07/2024	V.P.	<p>What does the proposal mean for how planning applications will be assessed, and the supporting information required?</p> <p>Concern about what is perceived to be a subjective approach to assessing 'protecting the character' and implications of this for decisions on applications.</p>	Questions and concern	Pinner
3) 11/07/2024	P.C. on behalf of the Pinner Local History Society	The Pinner Local History Society provide full support.	Support	Pinner
4) 17/07/2024	C.W., Pinner Association	Indicated they will email through an electronic copy of 'Meadow Road - 100 years' which includes interesting images of house plans perhaps from the RIBA drawings archive.	Neutral	Pinner
5) 20/07/2024	J&S S.	Sought clarification as to whether 39 and 40 Meadow Road are included?	Neutral (questions)	Pinner
6) 24/07/2024	Pinner Association	Enclosing 'Meadow Road 100-year history' publication.	Neutral (providing information).	Pinner
7) 31/07/2024	Conservation Area Advisory Committee	Conveyed that they consider the areas are worthy as 'local areas of special character'.	Support	Pinner and

Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
				West Harrow
8) 18/08/2024	Mr & Mrs D.	<p>As part of the Diamond Jubilee celebrations a brochure was produced by a resident detailing historical aspects of Meadow Road as far back as 1908 when it was a picnic ground and a 1910 photo showing the first houses with examples of original fixtures and fittings still here. It provides a record of past residents some of whom would have had servants and some, such as Mabel Wilkinson of no 7, participated in the suffragette movement and imprisoned with others for smashing windows in the West End in 1912.</p> <p>The book Metro-Land (1924 edition) published in association with London's Transport Museum has a photo of Meadow Road (page 42) showing the road as an example of Metro-land beginnings.</p>	Support	Pinner

Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
9) 21/08/2024	S .P.	 <p data-bbox="734 970 1637 1007">If designated can these works with/without planning permission:</p> <ol data-bbox="734 1050 1256 1313" style="list-style-type: none"> 1. Change the front door 2. Add a modern external porch door 3. Replace the front wall 4. Double glazed windows 5. Solar Panels 6. Air source heat pump 7. Electric charging points. 	Neutral (asking questions)	West Harrow

Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
		Would there be any grants available as a result of an LASC designation?		
10)21/08/2024	N. L.	<p>Notes from a phone call:</p> <p>What is the difference to a conservation area? It is too late to protect heritage value and not fair to those that have not yet made changes. Extensions are important. Would it affect value of houses?</p> <p>There are other streets just as nice.</p>	Object	Pinner
11)29/08/2024	T. R.& P. S. 16 West End Avenue Pinner HA5 1BJ	<p>Strong support.</p> <p>We would draw your attention to a plan notified to us by Harrow Council to make Footway improvements. The proposed replacement of the dropped granite kerbs with concrete is not in keeping. Please liaise with the Harrow Highways Team.</p>	Support	Pinner
12)2/09/2024	M. W. West Harrow Community Forum	<p>Letter enclosing a petition:</p> <p>The WHCF Trustees discussed with wider groups at the July community party in West Harrow park. The response is unanimously positive. A few questions to understand the difference between a conservation area and a LASC.</p> <p>Questioned why the proposed LASC designation was restricted to three small areas. The whole area was developed from the mid-1890s to the commencement of the First World War and</p>	Support	West Harrow

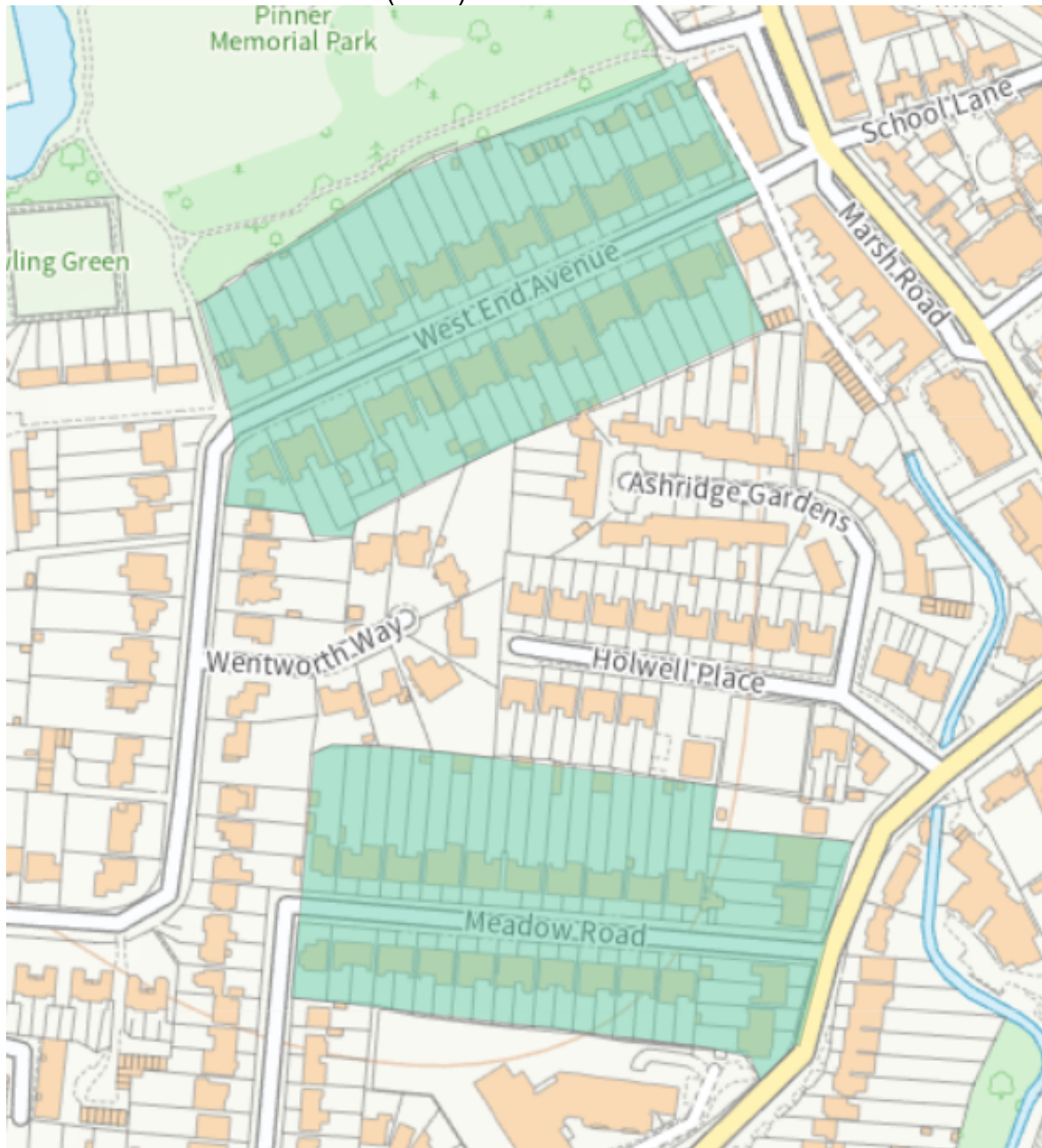
Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
		<p>remains largely unaltered. A second phase of the LASC rollout should be considered. We would welcome an opportunity to show you the area and discuss extension of the designation.</p> <p>Petition signed by members of the public:</p> <p>‘We the undersigned are in favour of Harrow’s current plan to recognise parts of West Harrow as Areas of Special Character. Furthermore, we would ask the council to actively consider extending their proposal beyond Butler Avenue, Lance Road, and the Park. We believe that it would be appropriate to consider a wider area of West Harrow given that it was all developed from the mid 1890s until the beginning of the First World War and remains substantially unaltered.’</p>		
13)3/09/2024	R.	I think West End Avenue is beautiful full of historic houses and the entire road should be an area of special character.	Support	Pinner
14)9/08/2024	Historic England	<p>The proposals comply with the NPPF including policies 196, 198 and 209 which require a positive up to date strategy and clear definition of significance. The areas should be assessed using detailed understanding of local heritage.</p> <p>Our principal recommendation is that local heritage assets should be assessed against clear, consistent criteria and supported by a statement of significance. Refer to our advice note.</p>	Support	Pinner and West Harrow

Date	Name of respondent (initials for individuals)	Response – email unless indicated otherwise	Support?	Area
		<p data-bbox="730 347 1619 416">https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</p> <p data-bbox="730 459 1653 528">Agree the areas are potentially not eligible for conservation area status. But we consider the analysis undertaken is very thorough.</p>		

Appendix 2 - Maps of Areas Proposed for Adoption

Pinner: Map of proposed West End Avenue, Meadow Road, and Eastcote Road Local Area of Special Character

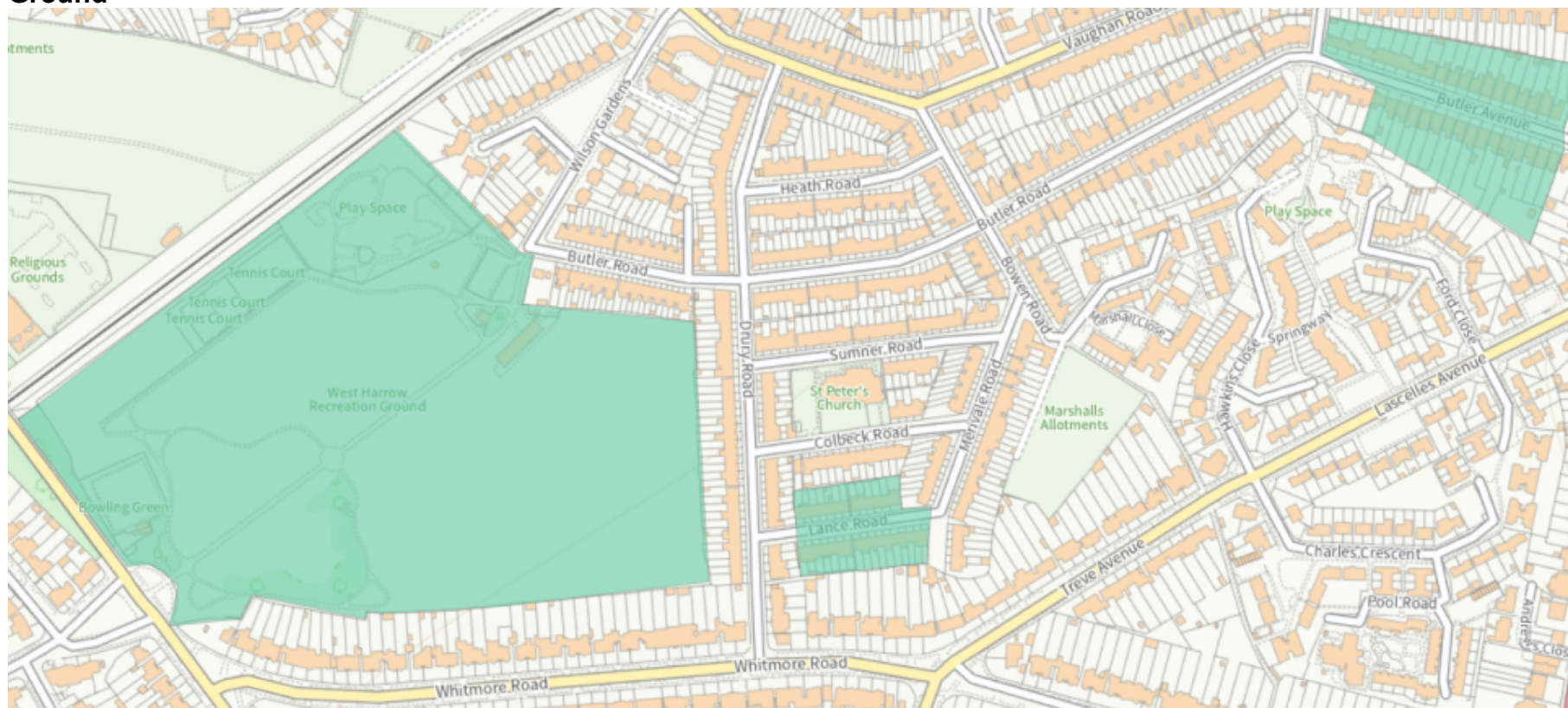
1 and 3 - 40 (all) West End Avenue, 1-38 (all) Meadow Road and 24-38
(even) Eastcote Road:



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West Harrow: Map of proposed Butler Avenue, Lance Road, and West Harrow Recreation Ground Local Area of Special Character

3-29 (odd) and 2-40 (even) Butler Avenue and 2-26 (even) and 1-33 (odd) Lance Road and West Harrow Recreation Ground



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