

Planning Policy Advisory Panel Supplemental Agenda

Date: Thursday 4 May 2023

7. **Proposed Harrow Town Centre Masterplan Supplementary Planning Document (SPD) - Scoping (Pages 1 - 10)**
8. **Proposed West Drive and Bellfield Avenue Conservation Area Designation - Outcomes of Consultation and Recommendations (Pages 11 - 34)**

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**Report for: Planning Policy
Advisory Panel**

Date of Meeting:	4 th May 2023
Subject:	Proposed Harrow Town Centre Masterplan Supplementary Planning Document (SPD) – scoping
Key Decision:	No – for information and comment only
Responsible Officer:	Dipti Patel, Corporate Director Place Viv Evans, Chief Planning Officer Kirstan Shiels, Head of Regeneration
Portfolio Holder:	Cllr Marilyn Ashton Portfolio Holder for Planning & Regeneration
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	Greenhill, Headstone, Marlborough (dependent on the final boundary of the Master Plan / SPD)
Enclosures:	None

Section 1 – Summary and Recommendations

The Council has committed to preparing a Master Plan for Harrow Town Centre. It is proposed to adopt this as a Supplementary Planning Document (SPD) so that it is a material consideration in determining planning applications. The master plan seeks to define and describe the future of Harrow Town Centre. This report introduces the proposed master plan, why it is being prepared, its likely scope, the approach to its preparation and estimated timeframes. The Panel is requested to:

- 1) Note the content of the report (and accompanying presentation) and the proposed approach to bringing forward a Harrow Town Centre Masterplan Supplementary Planning Document
- 2) Provide comments / feedback in relation to the information set out in this report and accompanying presentation at the meeting.
- 3) Agree to progress the preparation of the draft Harrow Town Centre Masterplan Supplementary Planning Document.

Reason: (for recommendations)

To outline the approach to preparing the Harrow Town Centre Masterplan Supplementary Planning Document (SPD). Seeking feedback on potential outcomes of the SPD.

Section 2 – Report

1.0 Introduction

- 1.1 This report sets out some of the initial findings from a scoping report on Harrow Town Centre. It lays out the changes since the establishment of the Area Action Plan, the challenges Harrow Town Centre is currently facing as a result of the spatial, social, and economic changes within the borough. In addition, it sets out why, in the face of these challenges, it is necessary to provide clear guidance on what the future of the Harrow town centre should be and how it will benefit the borough in the long term.
- 1.2 The Council is committed to prepare a Harrow Town Centre Masterplan Supplementary Planning Document (SPD) in order to proactively respond to changes within the centre and the pressures it faces. This reflects the centre's role as the largest centre in the borough and the one that has been subject to the most change since the current Local Plan was adopted. Harrow Town Centre is one of only fourteen Metropolitan Town Centres in the London Plan¹ and the most important centre in the borough with respect to its function (mix of uses) and scale (floor space).

2.0 Options considered

- 2.1 To do nothing and rely on the existing local policy framework (the most relevant being the Core Strategy and Harrow and Wealdstone Area Action Plan adopted in 2012 and 2013 respectively). The London Plan 2021 has been subsequently published and the new Harrow Local Plan will not be

¹ The London Plan indicates metropolitan centres 'serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.'

completed and adopted for at least two years meaning to do nothing would leave a significant period without contemporary guidance for the town centre that if adopted as an SPD, would be a material consideration in determining planning applications. This option has therefore been dismissed.

- 2.2 A second option is to prepare a master plan but not adopt it as a formal SPD. To do so would mean that very limited, if any, weight could be given to the document for planning purposes. This would limit the document's scope to influence development within the town centre; such development is likely to be a primary mechanism to achieve positive change in the centre. This option has therefore been dismissed.

3.0 Why a change is needed

- 3.1 Harrow Council needs to take a proactive approach towards the future of the town centre, considering the rapid changes that have occurred in recent years. These changes include the increasing popularity of online shopping, the evolving role of the town centre and high street, the shift in consumer spending patterns due to e-commerce, and most recently, the changes in work and lifestyle patterns resulting from the pandemic.
- 3.2 There have been significant changes to Harrow Town Centre in recent years, including:
- (a) There has been a gradual loss of office space due to conversion to residential, resulting in a decrease in the number of daytime office workers.
 - (b) an increase in the resident population of the town centre due to conversion and new residential buildings in and around the town centre.
- 3.3 The local economy is changing due to the increased population in the town centre, as well as the new ways of working that have emerged after the pandemic.
- 3.4 Evidence² supporting the London Plan 2021 indicates the following with respect to Harrow's Metropolitan Town Centre:
- (a) below average level of floorspace (excluding offices) with the centre having some of the lowest floorspace levels of all the Metropolitan Centres.
 - (b) Significant loss of office floorspace (namely through office to residential permitted development rights)
 - (c) Low office rentals
 - (d) Mid-range night-time economy floorspace compared to other centres.

² [London To Centre Health Check 2017](#)

- 3.5 Harrow's own monitoring indicates that 6.3% of floorspace in the Metropolitan Centre was vacant in July 2022. This compares to 3.6% in 2012 and 5.2% in 2019 (before the pandemic). In 2022, 49% of floorspace in Harrow was convenience retail and 10% comparison / durable goods retail, with a further 34% being service floorspace. Convenience floorspace has declined from 60% of floorspace in 2012, with comparison / durables floorspace being broadly static compared to 9% of total floorspace in 2012. Service floorspace has increased from 27% of all floorspace in 2012.
- 3.6 The impact of the conversion of office to residential (under permitted development rights) since 2013 has been significant. By the end of September 2022, prior approval had been granted for 58,462 sqm of floorspace in Harrow Town Centre, equating to 1,214 dwellings. If fully implemented, this would result in the loss of circa 5,000 jobs and £154m in disposable income.
- 3.7 To maintain Harrow Town Centre's Metropolitan Town Centre status, it is imperative to establish a new vision that outlines clear objectives for future developments and potential economic activities in the area.
- 3.8 There are several strategic land holdings, either within the ownership of Harrow Council or development sites that will have a major impact to Harrow Town Centre currently being considered for major redevelopment, they include,
- (a) Harrow on the Hill underground station
 - (b) Harrow Bus Station
 - (c) Kings House and Queens House
 - (d) Greenhill Way Car Park
 - (e) Major development sites adjacent to Harrow town centre under the HSDP partnership, such as Poets Corner, Peel Road, Milton Road and Byron Park. While they are not within the town centre, the close proximity and the scale of these developments will nevertheless have an impact to the town centre.
- 3.9 These developments will have a major impact on the future of the town centre and is imperative to establish the spatial relationship between them.
- 3.10 The Harrow & Wealdstone Area Action Plan was produced in 2013. While some of the policies are still applicable to Harrow Town Centre, the demographic, economic, social, and spatial conditions have changed in the past decade. Therefore, it is necessary to expand on the policies in the current AAP policies to address the challenges we face today and in the future.
- 3.11 Harrow Council is currently in the process of producing an updated Local Plan, which can take several years to develop before it becomes statutory local policies. There is a gap in terms of updated policies that can inform the future of Harrow Town Centre.

4.0 Why do we need a masterplan?

- 4.1 Currently, the town centre is facing numerous challenges compared to when the AAP was produced a decade ago. Harrow's own research indicated there has been a 60% increase in the resident population of the town centre because of new residential developments within the Town Centre, together with permitted development conversions from office space to residential units.
- 4.2 Key residential developments within Harrow Town Centre include Perceval Square, located next to Harrow on the Hill station, the former council-owned site in Gayton Road, as well as major developments in Lyon Road/St. John's Road. These are well-planned developments located in strategic location within the town centre, however the consequences of the increased population, including the long-term needs, support and services will have to be addressed.
- 4.3 Since the inception of the AAP, the way we use our high streets and town centres has changed dramatically. According to the Office for National Statistics, online shopping accounted for less than 10% of total retail sales in the UK in 2013. This trend has continued to increase and jumped to over 20% by the end of 2019. During the peak of the pandemic, from March 2020 to the end of 2021, internet shopping accounted for over 30% of total retail sales in the UK. This has a dramatic effect and reshapes high street retail not only in the UK, but across the globe. In common with retail trends nationally, there has been a shift away from the traditional retail model of maintaining a physical presence on the High Street towards warehouses located on the edge of town and online shopping
- 4.4 The consequence of these changing habits is the emergence of a fundamental shift in how the high street and town centre are perceived and used. Rather than engaging in purely transactional activities, consumers are now seeking an overall experience when visiting high streets and town centres.
- 4.5 The COVID-19 pandemic has changed the way we live, work, and use local facilities. Virtual meetings and hybrid working have become common practices.
- 4.6 Studies carried out by Office for National Statistics in 2022 indicated that the most common hybrid working pattern that worker planned to use (42%), was working mostly from home and sometimes from their usual place of work. This lifestyle shift has changed the way the population uses their town centre and what they are looking for.
- 4.7 To address the challenges facing Harrow Town Centre today and in the near future, specific guidance should be established to define a vision for what the town centre could become. This includes determining its physical appearance, identifying the types of uses and activities that should

be encouraged, and exploring how different types of developments and activities can work together cohesively.

5.0 What can a Town Centre masterplan do?

- 5.1 Providing specific guidance for the future of Harrow Town Centre would offer greater clarity throughout the borough regarding the ambition, purpose, and function. The SPD will provide specific clarification on the types of businesses, uses, and activities that should be encouraged within the defined boundary.
- 5.2 The masterplan will establish a clear narrative for how Harrow Town Centre will operate and function within the borough, as well as how it will relate to and interact with,
 - (a) Other town centres within the borough.
 - (b) Key regeneration projects in the immediate surrounding area.
 - (c) Key streets and spaces within the masterplan area.
- 5.3 The vision will provide recommendations on the hierarchy and urban structure of the town centre, defining the hierarchy of key streets and spaces within it.
- 5.4 It will include recommendations for the types of uses and activities that should be encouraged in the town centre. These recommendations will provide guidance and instil confidence in the Council regarding the future of the Town Centre.
- 5.5 By providing clear recommendations and guidance, stakeholders can establish a clear direction for future development in Harrow Town Centre. This will encourage potential investors, employers, and businesses to invest in the area with confidence.

6.0 Harrow Local Plan policies the SPD will expand upon

- 6.1 This will be confirmed when working with the Planning Policy Team to ensure a seamless integration, and to ensure there are no overlap or policy gaps being left behind. While the SPD cannot bring forward new policy, the guidance may impact upon existing policies included in,
 - (a) Harrow & Wealdstone Area Action Plan and,
 - (b) Core Strategy

Other relevant policies for the SPD

- (a) The London Plan
- (b) NPPF

7.0 Extent of Harrow Town Centre Master Plan SPD

- 7.1 The proposed Master Plan is currently being scoped; this includes the extent of the area to be covered by the SPD. There are already several boundaries that cover the Town Centre, including:
- (a) the Business Improvement District (BID) boundary;
 - (b) the statutory town centre boundary (identified in the Local Plan); and
 - (c) ward boundaries.
- 7.2 As noted above, the master plan will cover a range of issues (i.e. land use / infrastructure) and regard will need to be given as to whether the boundary of the master plan / SPD goes beyond the administrative boundaries above to better reflect land use, character and functional relationships (i.e. with nearby open space, the impact of development in the vicinity of the town centre etc).
- 7.3 The draft SPD will set out the boundary of the SPD and the rationale for it.

8.0 Broad Outputs for the Harrow Town Centre Master Plan SPD:

- 8.1 The following outputs and outcomes are envisaged for the preparation of the Harrow Town Centre Masterplan SPD:
- **Understanding the past** – what are the significance of the development of Harrow Town Centre within in the London context
 - **The challenge of the present** – what are the recent issues and challenges (social, economic and spatial) that differ from the Area Action Plan
 - **Learning the Harrow Town Centre**
 - Understanding the Urban Structure – uses, heights, grains, plots, blocks, soft and hard sites
 - Key streets and spaces
 - Key Buildings and Sites
 - How does it compare with similar town centres – empirical analysis
 - **Peeking into the Future** – What can Harrow Town Centre be in the future
 - **Strategic Vision**
 - **Objectives**
 - **Key routes and spaces**
 - **Scale, height and massing**

- **Uses**
- **Movement**
- **Potential strategic projects** – short/medium/long term

9.0 Timeframes

- 9.1 The proposed timeframes for the preparation of the SPD are being developed as part of the scoping exercise. Broadly speaking, formal consultation on the draft SPD is likely to occur towards the end of 2023 or early 2024.
- 9.2 The Master Plan SPD will set out the vision for Harrow Town Centre and provide guidance for the area. Given this, it is envisaged that a wide range of consultation will be undertaken during the document's preparation; this will be in addition to the formal six-week consultation on the draft SPD itself.
- 9.3 The Panel will receive reports on the progress of the SPD at key stages, including the draft document before it is presented to Cabinet.

Implications of the recommendation

Considerations

Ward Councillors' comments

Ward Councillors input will be sought during the preparation of the SPD and any formal consultation which is a statutory requirement.

Performance Issues – will be dealt with as the SPD is being developed, these will be considered by the Cabinet + Project Team

Environmental Implication – None

Data Protection Implications – None

Risk Management Implications - TBC

Finance Implications

Costs of the preparation of the SPD will be met from within existing resources within the Regeneration and Planning Policy teams. Any additional support would only be procured if budget is available.

Legal Implications

Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The Town and Country Planning (Local Planning) (England) Regulations 2012 provide guidance on the preparation and adoption of supplementary planning documents.

Although the proposed SPD is not a development plan document it will, on adoption, be a material consideration in the determination of development proposals within Harrow Town Centre.

The Council is required by law to consult on the SPD and to take into account all consultation responses received before adopting the SPD. As soon as reasonably practicable after adopting an SPD, the Council must (i) make available the SPD and an adoption statement and (ii) send a copy of the adoption statement to any person who asked to be notified of the adoption of the SPD.

Equalities implications / Public Sector Equality Duty

By definition, supplementary planning documents cannot introduce new policies nor modify adopted policies and do not form a part of the development plan. Rather, their role is to supplement a 'parent' policy in a development plan document. The proposed SPD the subject of this report will supplement adopted policies within the Harrow Core Strategy and subsequent Development Management Policies Local Plan. A full equalities impact assessment was carried out at each formal stage in the preparation of the Core Strategy. Similarly, the London Plan (including Policy D9: Tall Buildings) was subject to an Equalities Impact Assessment as part of the broader Integrated Impact Assessment of the Plan. This will be reviewed to determine whether there is a need to prepare a SPD specific EqIA.

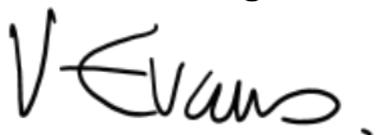
Council Priorities

Putting residents first.

The progression of a Harrow Town Centre Masterplan is a commitment by the Council in the Corporate Plan that was adopted by Cabinet on 16 February 2023. This report and the proposed approach sets out the approach by the Council to deliver the Harrow Town Centre Masterplan SPD, which would reflect the priorities of the Council to Restore Pride in Harrow, Put Residents First and for a borough that is clean and safe. .

Section 3 - Statutory Officer Clearance

Chief Planning Officer: Viv Evans



Date: 26 April 2023

Mandatory Checks

Ward Councillors notified: Yes

EqIA carried out: No: for information only

EqIA cleared by: N/A

Section 4 - Contact Details and Background Papers

Contact:

Ming Cheng, Masterplanner, ming.cheng@harrow.gov.uk

David Hughes, Planning Policy Manager, david.hughes@harrow.gov.uk

Background Papers:

Harrow Core Strategy: <https://www.harrow.gov.uk/downloads/file/26426/local-plan-core-strategy.pdf>

Harrow and Wealdstone Area Action Plan: <https://www.harrow.gov.uk/planning-developments/harrow-wealdstone-area-action-plan>

London Plan: [The London Plan 2021 | London City Hall](#)

**Report for: Planning Policy
Advisory Panel**

Date of Meeting:	4 th May 2023
Subject:	Proposed West Drive and Bellfield Avenue Conservation Area designation – outcomes of consultation and recommendations
Key Decision:	No
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:	Harrow Weald
Enclosures:	Appendix 1 – Map of proposed conservation area subject to consultation Appendix 2 – Revised conservation area boundary post-consultation Appendix 3 – Consultation report

Section 1 – Summary and Recommendations

This report details the outcomes of the recent consultation on the proposed West Drive and Bellfield Avenue conservation area in Harrow Weald (Appendix 1). The consultation ran for a period of six weeks from 20 February 2023 to 3 April 2023. This matter was previously considered by the Panel at its meeting on 30 November 2022; at its meeting on 19 January 2023, Cabinet agreed to the Panel's recommendation that consultation be occur on the proposed area.

As a result of consultation responses received (documented in section 6) the report recommends two minor amendments proposed conservation area boundary; these amendments remove 30 and 32 Bellfield Avenue from the

proposed conservation area and include 128, 130 and 132 Uxbridge Road. The revised boundary is shown in Appendix 2 and comprises 1-41 (consecutive) West Drive, 1-29, 31, and 33-47 (consecutive) Bellfield Avenue, all of West Drive Gardens and 128, 130 and 132 Uxbridge Road.

Recommendations:

The Planning Policy Advisory Panel is requested to:

- 1) Note and comment on the outcomes of the consultation undertaken on the proposed West Drive and Bellfield Avenue conservation area;
- 2) Note and comment on any responses received as a result of the additional letters sent in response to comments received during the formal consultation period and impacting upon the proposed boundary (to be reported verbally to the Panel meeting)
- 3) Note and comment on the amended proposed conservation area boundary; and
- 4) Recommend the revised area to Cabinet for designation as the 'West Drive and Bellfield Avenue, subject to any further consultation responses received (which will be formally reported to Cabinet).

Reason:

Conservation Areas are designated under the Listed Buildings and Conservation Areas Act 1990 ('the Act') which states in section 69 that 'every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas'. Consideration of the proposed area as a possible conservation area therefore fulfils Section 69 of the Act.

Section 2 – Report

1.0 Introductory paragraph

- 1.1 The report incorporates the corporate priority concerning:
 - Putting Residents First
- 1.2 Should the area be designated as a conservation area status, the improved protection of areas of special architectural or historic interest will help maintain the unique historical local character of areas or neighbourhoods within Harrow which residents cherish and value. It also contributes to the overarching objective to restore pride in Harrow.

2.0 Options considered

- 2.1 The option of not reviewing the area for consultation area status was considered but this would be contrary to the Council's statutory obligations under the Planning (Listed Buildings and Conservation Areas) Act 1990, under which local planning authorities are required to carry out reviews 'from time to time' to ensure areas are adequately protected.
- 2.2 The option not to consult on the proposed area was considered and dismissed. This is because whilst consultation is not a statutory requirement it is best practice and doing so reflects the corporate priority of Putting Residents First.
- 2.3 The body of this report outlines options (and recommendations) in response to responses received to the consultation, including whether to designate the area as a conservation area and whether or not to amend the boundary in response to comments received during consultation.

3.0 Background – what is a conservation area

- 3.1 Conservation Areas are designated under the Listed Buildings and Conservation Areas Act 1990 which states in section 69 that 'every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas'.
- 3.2 In order for an area to be appropriate for designation as a conservation area, it must fulfil two of the following criteria as outlined in the four SPDs covering the borough's existing conservation areas:
- 1) Areas with a high concentration of Listed Buildings, whether statutorily or locally listed;
 - 2) Areas of historical, social, economic and/or architectural merit;
 - 3) Areas with a high proportion of buildings built prior to 1920, which remain largely unaltered;
 - 4) Areas built post 1920 that are innovative in planning or architectural detail, and where a large proportion remain unaltered;
 - 5) A significant group of buildings with distinct physical identity and cohesiveness;
 - 6) Areas which have a special quality, where the site layout and landscaping are of exceptionally high quality and/or contain historic open space, natural landmarks, topographical features or features of local distinctiveness¹

¹ These criteria were originally agreed by the Development Control Committee on 31 August 1998 as the criteria to be adopted in Harrow.

When not to designate?

- 3.3 The National Planning Policy Framework (NPPF) (2021) states in paragraph 191 that:
- ‘When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest’.
- 3.4 Historic England are the Government’s advisers on matters of heritage. They have published guidance entitled: ‘Conservation Area Appraisal, Designation and Management Historic England Advice Note 1’ [HEAN 1] (Second Edition) – February 2019. They highlight the above requirement of the NPPF twice in their guidance since it was also contained in earlier iterations of the NPPF.
- 3.5 In addition, HEAN1 mirrors the requirements of s.69 of the LBCA 1990 that there shall be both ‘special interest’ *and* ‘desirability to preserve or enhance’ for CA designation as it states in paragraph 11 that there is: ‘likely to be a stage when a decision would need to be taken as to the significance of an area and the likelihood of conservation area designation addressing relevant problems within the area. This is unlikely to be a lengthy process, the purpose being to consider whether an area has:
- a) sufficient architectural or historic interest for the area to be considered ‘special’?
 - b) whether this is experienced through its character or appearance? and
 - c) whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve’.
- 3.6 Thus, it indicates that where an area meets the criteria for designation, on occasion designation may not be desirable and prompts consideration as to what problems designation could help solve in order to determine the desirability of designation.

4.0 Background - Proposed West Drive and Bellfield Avenue Conservation Area

- 4.1 At its meeting on 30 November 2022 the Planning Policy Advisory Panel considered a report on three areas for potential conservation area designation against the local criteria for designation (set out in paragraph 3.2 above).
- 4.2 Two of the areas were considered not to meet the Council’s local criteria for designation.

- 4.3 The case for the third area (West Drive Gardens, Bellfield Avenue and West Drive numbers 1- 41 (odd) and 2-36 (even), Harrow Weald) was considered by officers as 'marginal'. Section 6 of the Panel report (see background papers) provides details of the assessment and conclusions for the area.
- 4.4 The Panel was requested to: 'consider the outcomes of the assessment of the areas to be considered for conservation area status and provide any comments'.
- 4.5 In the discussion that ensued, Members noted that:
- the background to the West Drive / Bellfield Avenue area was acknowledged. The observation made was that the 2015 consultation set the bar too high with respect to residents demonstrating how the area met the local criteria. Members and officers acknowledged that the case for inclusion in a Conservation Area was marginal (as noted in the assessment). However, on balance the area should proceed to consultation for potential inclusion in a Conservation Area. The suggested name was West Drive and Bellfield Avenue Conservation Area.
- 4.6 The West Drive and Bellfield Avenue area should proceed to consultation for potential designation as a new Conservation Area and that recommendation was agreed by Cabinet at its meeting on 19 January 2023.

5.0 Consultation arrangements

- 5.1 Residents of the proposed conservation area were sent letters informing them of the consultation (99 letters in total). These letters included information on the dates, context and ways to get involved in the consultation. QR codes were included on the letters to provide a direct and easy to access link to the engagement platform webpage which was run through the Council's My Harrow Talk (Engagement HQ) page.
- 5.2 Hard copy site notices were printed, laminated and placed around the proposed conservation area on streetlamps. The site notices gave a summary of the consultation including dates and ways to respond. A QR code was also included on the site notices to provide a direct link to the engagement platform webpage which provided a survey, that all those viewing the platform webpage could fill in once if they wished.
- 5.3 The online platform included a survey included three questions in relation to the proposal, in order to be straightforward and simple to respond to, avoiding unnecessary or confusing questions. Participants were required to register in order to respond to the survey, this ensures that the respondents are real people with email addresses. The survey could only be responded to once by each registered user.

- 5.4 Details of the consultation were also sent to Historic England in their role as Government's advisers on matters of heritage and publishers of official guidance in relation to conservation areas.
- 5.5 As a result of comments received as a result of the consultation, additional letters were sent to four additional properties (three proposed to be included and one removed), as outlined in section 6 below.

6.0 Outcomes of the Consultation

- 6.1 The consultation saw a total of 16 responses, with the majority of these in support of the proposed conservation area.
- 6.2 The online survey saw 10 respondents overall with eight of these living within the conservation area. Eight of these supported the inclusion of the area within a new conservation area (with one suggesting the boundary be extended to include some houses on the Uxbridge Road at the entrance to West Drive), whilst noting the criteria for conservation area status. In contrast, two did not support inclusion.
- 6.3 There were also six emails/letters of response. It is unclear if there was any overlap between these respondents and those in the online survey. Of those six emails/letters: three were in support, one against, one requested the boundary be amended to exclude 30 and 32 Bellfield Avenue (based on the age and character of these properties), whilst Historic England noted: 'There does not appear to be a clear case made for the special architectural and historic interest of the area to warrant designation'.

Comments in support

- 6.4 Those in support of inclusion noted the area should not have been de-designated and stated that both Bellfield Avenue and West Drive are representative of vernacular suburban architecture of the 1930s with a leafy relaxed atmosphere. Comments also noted there is a distinct physical identity and cohesiveness. It was intended to have a variety of styles of architecture of the properties. It was noted that the area was enjoyed by runners and the risk is that this identity will be destroyed by unsympathetic modernisation, greater hard-standing, more extensions and, worst, by demolishing and replacing the existing housing stock. The Conservation Area will help prevent that happening.
- 6.5 It was noted that past arguments put forward for Conservation Area status remain valid and have been strengthened over time. It was stated that the case for designation should be considered in the context of the wider neighbourhood, where changes have significantly diminished the traditional suburban aesthetic. It was noted that Bellfield Avenue and West Drive have retained much of their inter-war character, with individual detached properties set in large mature

gardens flanking the original estate boundaries. It was noted that the area was once part of the Harrow Weald Park Estate and that designation would protect a coherent picture of the origins the estate. Comments were made about the former Harrow Weald Park Estate area as a whole including that outside of the existing proposed conservation area as being designated a green belt area, parts considered a 'place of natural beauty' with a natural lake home to various bird species.

Comments seeking changes to proposed boundary

- 6.6 It was noted that houses at the entrance of West Drive on both side of the street i.e. those on Uxbridge Road should be included in the conservation area as they have significant architectural interest. A review of these houses suggests they have merit for inclusion given the character and interest of the proposed conservation area. 128 Uxbridge Road is locally listed as a building of special architectural and historic interest and the local list entry reads: 'Mock Tudor house of some quality dating from 1931, designed by GH Lake featuring mock timber framing and attractive leaded light windows. Number 130 and 132 Uxbridge Road appear to be of similar age and design.
- 6.7 Consequently additional consultation was undertaken, letters were sent to these houses: 128, 130 and 132 inviting comment from 6th April to 3rd May on the proposed inclusion of each property in the conservation area. The results will be verbally reported to the Panel at its meeting and formally documented in any subsequent report to Cabinet.
- 6.8 Similarly, it was requested by one respondent living in one of these houses that numbers 30 and 32 Bellfield Avenue should not be included in the proposed conservation area as they are much more modern houses as per those built at a similar time on Templars Drive and Lakeland Close. Council review shows these two houses are indeed more akin in age and design to the modern houses along Templars Drive and Lakeland Close that are being excluded from the proposed conservation area, and so the case for exclusion has merit.
- 6.9 Consequently additional consultation was undertaken, letters were sent to the remaining house on Bellfield Avenue of numbers 30 and 32 inviting comment from 6th April to 3rd May, on the proposed inclusion of each property in the conservation area. The results will be verbally reported to the Panel at its meeting and formally documented in any subsequent report to Cabinet.

Comment objecting to designation of the conservation area

- 6.10 The response against suggested the area does not have a high concentration of listed buildings, has no historical or architectural history left. Many of the houses have been modernised and there is no group of buildings with distinct physical identity. It stated that they saw no benefit therefore for including this in a conservation area. It

was observed that the area does not meet the listed criteria to be a conservation area i.e. many of the houses are newly renovated and extended with no original architectural value or distinct physical identity or any historical value. It was also suggested that designation as a conservation area would 'only add an onerous burden of bureaucracy to residents wishing to modernise their homes'. Therefore, it was stated that there was strong disagreement with this proposal.

- 6.11 The concerns regarding the level of architectural and historic interest are noted. Such comments reflect the fact that the report considered by the Panel at its meeting on 30 November 2022 concluded that the case for designation was marginal; as noted above, more responses were in support of designation than against it. Any additional planning requirements arising from designation are intended to assist in the preservation of the area's interest.

Historic England's response

- 6.12 Historic England are the Government's advisors on heritage and were consulted as part of the overall consultation process. They noted that the *National Planning Policy Framework* (NPPF, 2019) requires that heritage assets be conserved in a manner appropriate to their significance. NPPF Policy 191 sets out that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. Whilst noting the assets of the proposed conservation area including its attractive and leafy streets of detached suburban houses dating, predominantly, from the inter-war period, and its low-rise development, they conclude that:

'Overall the area is not notable for its local architectural or historic significance. As noted in the report, the area does not possess a historic or consistent architectural character that would demonstrate a strong case for designation when considered against NPPF Policy 191. Additionally, the extent of existing accumulative alterations has to some extent undermined any consistency of architectural or historic character. The layout of the streets is not notably innovative or reflecting patterns of historic land use. In our view, therefore there does not appear to be a clear case made for the special architectural and historic interest of the area to warrant designation.'

- 6.13 They further noted:
- 'The area is characteristically similar to other undesignated suburban areas within the borough and the Council must therefore also weigh up the wider implications of designation in respect of establishing a precedent in respect of the wider characterisation of the borough'.
 - 'The Council will also need to consider, given the area's marginal interest, whether conservation area status is likely to be

an effective tool to preserve or enhance its character and appearance. Given the extent of existing alteration and the areas marginal significance, designation would seem unlikely to be effective in managing future change'

- 'NPPF Policy 191, sets out a requirement for local authorities to ensure that an area justifies such status because of its special architectural or historic interest. For the reasons set out above we do not consider a clear case for designation is set out in this instance'.

6.14 As a final point they note that in the event the Council is minded to designate the conservation area despite the above, they would recommend that a full appraisal and area management plan is undertaken as soon as possible.

6.15 Appendix 3 provides further detail in relation to the consultation outcomes.

7.0 Discussion and recommendation

7.1 There is clear support from residents for the principle of designating the area as a conservation area, notwithstanding the receipt of three objections. Two representations suggested amendments to the proposed boundary, as outlined in Section 6 above. In response to this, the proposed boundary has been amended to include those houses along the Uxbridge Road (128, 130 and 132) with architectural and historic merit at the entrance to this proposed Conservation Area, whilst to exclude numbers 30 and 32 Bellfield Avenue which are relatively modern houses that do not relate to the remainder of the proposed Conservation Area. Further consideration may need to be given to these proposed boundary changes depending on any responses received from the affected properties, with these due on 3 May 2023 (after the publication of the agenda).

7.2 Historic England's response re-iterates the NPPF requirement (paragraph 191) for local authorities to ensure that an area justifies such status because of its special architectural or historic interest and state they do not consider a clear case for designation is set out in this instance. This and the marginal nature of the area with respect to the conservation area criteria were documented in the report to the Panel on 30 November 2023, with the Panel concluding 'that the case for inclusion in a Conservation Area was marginal (as noted in the assessment). However, on balance the area should proceed to consultation for potential inclusion in a Conservation Area'. As noted above, the consultation has indicated clear support for the designation from residents. Historic England note that in the event that the Council designates the area, it is recommended that a full appraisal and area management plan is promptly undertaken.

- 7.3 In the context of the above, it is recommended that the Panel commend to Cabinet the designation of the area (subject to amendments to the boundary identified in paragraph 7.1) as a conservation area.

Ward Councillors' comments – these will be invited when the agenda for the Panel's meeting is published.

Data Protection Implications

Any personal data collected as part of the consultation process has been and will continue to be handled in a manner consistent with the General Data Protection Regulations (GDPR).

Risk Management Implications

Risk included on Directorate risk register? No

Separate risk register in place? No

There are no significant risks arising from the recommendations. A full risk assessment section will be completed when the matter is reported to Cabinet.

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.

Should Cabinet resolve to designate the area as a conservation area, section 70 (5) of the Act requires the Local Planning Authority to give notice to the Secretary of State and Historic England ('the Commission'). Section 70 (8) requires that notice of designation is published in the London Gazette and in at least one newspaper circulating in the area of the local planning authority.

Financial Implications

The costs of undertaking the 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 conservation area), any costs will also be met from existing revenue budgets.

Equalities implications / Public Sector Equality Duty

Was an Equality Impact Assessment carried out? No

An Equalities Impact Assessment (EqIA) is not considered necessary in respect of the designation of a conservation area. 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 Conservation Areas is assessed was subject to an equalities impact assessment prior to its adoption. The consultation recommended in this report would be undertaken in accordance with adopted Council standards, such as the Statement of Community Involvement (SCI).

Council Priorities

The decision sought will help the Council meet the priority of improving the environment and restoring pride in Harrow 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

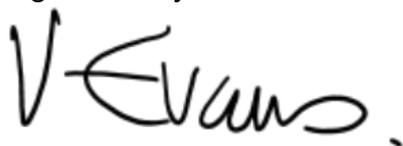
Statutory Officer: Jessie Man
Signed on behalf of the Chief Financial Officer

Date: 21 April 2023

Statutory Officer: Jimmy Walsh
Signed on behalf of the Monitoring Officer

Date: 25 April 2023

Chief Officer: Viv Evans
Signed off by the Chief Planning Officer



Date: 26 April 2023

Mandatory Checks

Ward Councillors notified: YES

EqlA carried out: NO – refer to above

EqlA cleared by: N/A

Section 4 - Contact Details and Background Papers

Contact: David Hughes, Planning Policy Manager,
david.hughes@harrow.gov.uk

Background Papers:

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

Planning Policy Advisory Panel report (30 November 2023) (item 18) - [Agenda for Planning Policy Advisory Panel on Wednesday 30 November 2022, 6.30 pm – Harrow Council](#)

Cabinet report (19 January 2023) (item 88) - [Agenda for Cabinet on Thursday 19 January 2023, 6.30 pm – Harrow Council](#)

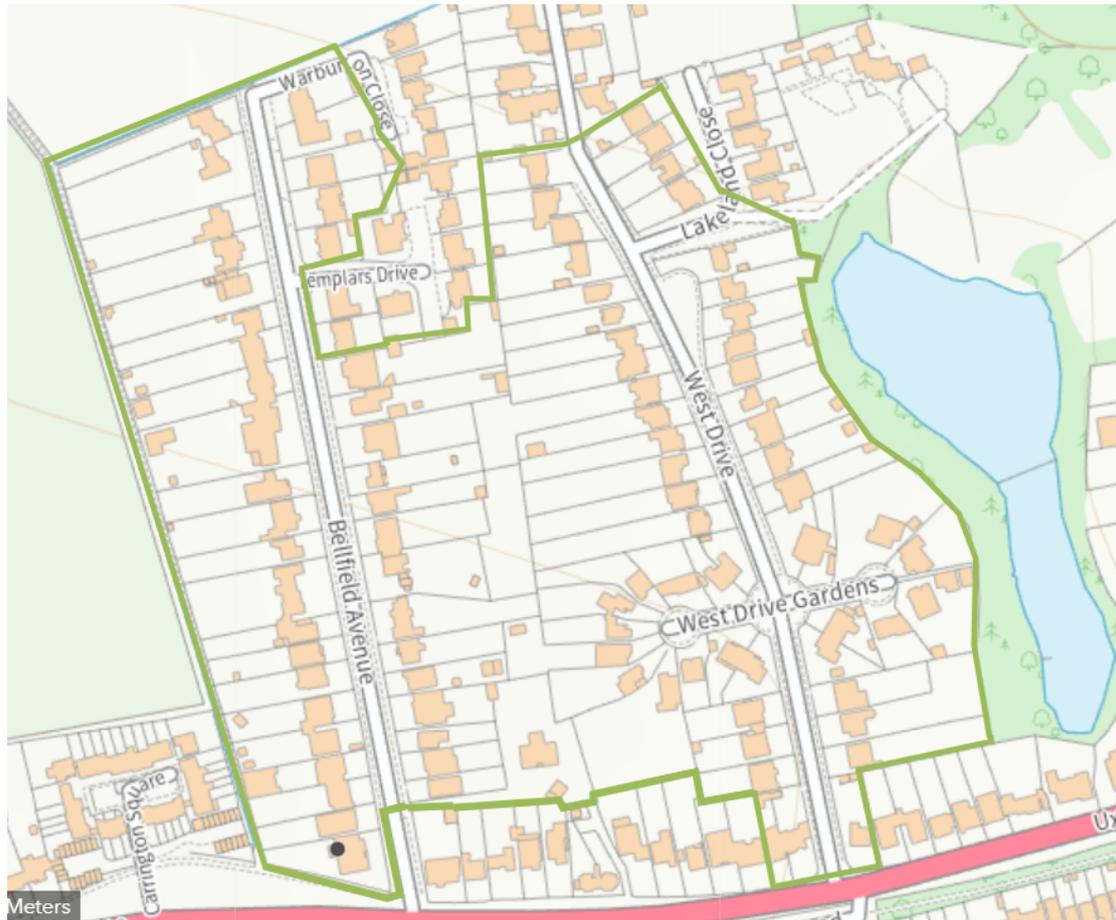
Appendix 1 – Map of proposed conservation area subject to consultation

West Drive Gardens, Bellfield Avenue and numbers West Drive1- 41 (odd) and 2-36 (even), Harrow Weald



Appendix 2 – Revised conservation area boundary post-consultation

1-41 (consecutive) West Drive, 1-29, 31, and 33-47 (consecutive) Bellfield Avenue, all of West Drive Gardens and 128, 130 and 132 Uxbridge Road.



Appendix 3 – Consultation report

See separate document



**Proposed West Drive and Bellfield Avenue Conservation
Area
Consultation Report
April 2023**

Table of Contents

1. Introduction
2. Consultation Activities
3. Consultation Findings
4. Conclusion

1. Introduction

- 1.1 This report details the process and outcomes of the West Drive and Bellfield Avenue Conservation Area consultation undertaken by Harrow Council. The consultation ran for a period of 6 weeks from 20 February 2023 to 3 April 2023.

Project Context (Why was this project initiated?)

Following a review of potential areas for designation as conservation areas in late 2022, Harrow Council has identified West Drive and Bellfield Avenue for potential designation. The Council want to understand what the residents of West Drive and Bellfield Avenue think about designation. It also seeks to understand the views of Historic England, the Government's advisors on heritage matters.

Project Aims (What does the project hope to achieve?)

The aims of this consultation were to:

- Advise the community about what a potential conservation area designation might mean for them and their neighbours;
- Undertake meaningful, inclusive and transparent consultation to understand the community's views on designating the area a conservation area;
- Use the feedback to help the Council make any final decision whether or not to designate the area as a conservation area, including any changes to the proposed conservation area border;
- Feed back to the community to let them know that we have listened and acted on the information they have provided.

How will the information in this summary report be used?

The information in this report will detail the findings of the consultation and be shown to decision makers within the council. The decision makers will then decide whether to amend the conservation area border, and/or formally designate the area as a conservation area in its current form.

Consultation Materials

Residents of the proposed conservation area were sent letters informing them of the consultation (99 letters in total). These letters included information on the dates, context and ways to get involved in the consultation. QR codes were included on the letters to provide a direct and easy to access link to the engagement platform webpage.

Hard copy site notices (seven) were printed, laminated and placed around the proposed conservation area on streetlamps. The site notices gave a quick summary of the consultation including dates and ways to respond. A QR code was also included on the site notices to provide a direct link to the engagement platform webpage.

2. Consultation Activities

Engagement Platform

2.1 The engagement platform was run through the Council's My Harrow Talk (Engagement HQ) page. While the page was live it was visited 177 times resulting in 142 aware visitors (visited at least one page), 61 informed visitors (visited multiple pages / downloaded a document) and 11 engaged visitors (completed the survey or asked a question). The page saw the most traffic during early March as shown by the visitor summary timeline below.

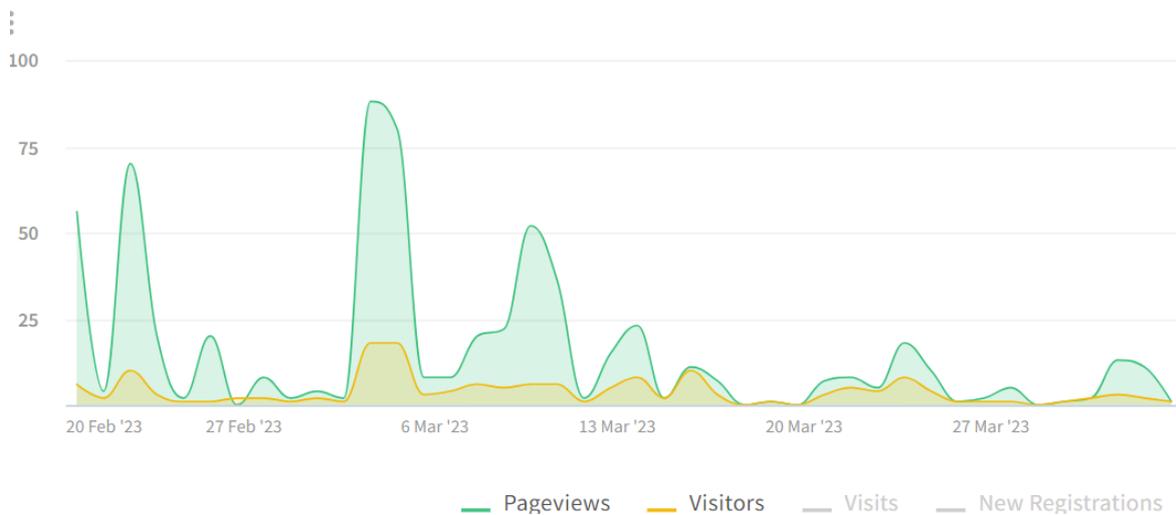
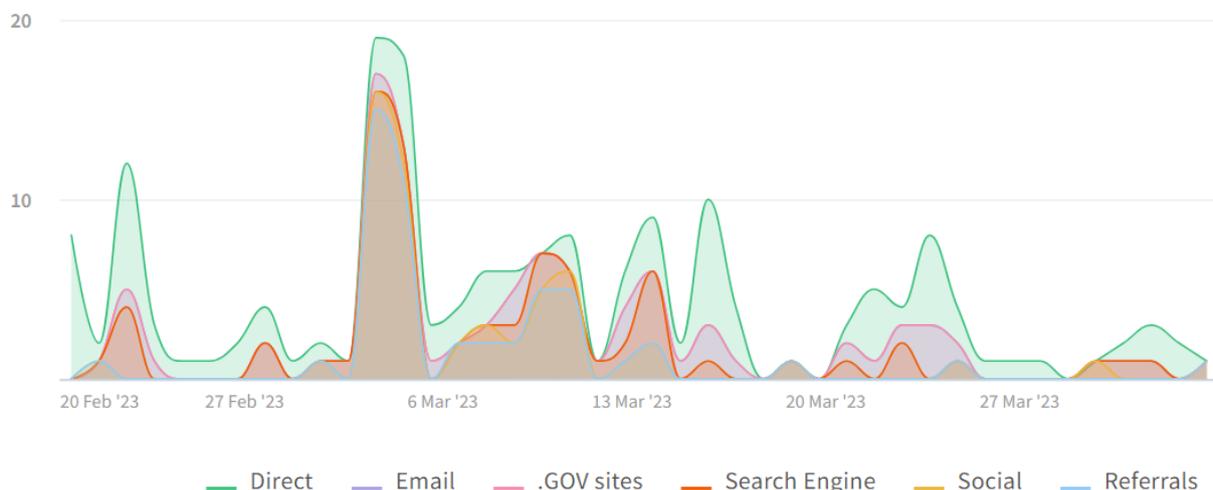


Figure 1: Timeline of engagement platform visitors

2.2 Visits to the page came from a variety of sources. Direct visits accounted for the majority of visits. These likely came from the QR codes on the letters to residents and hard copy site notices. It is worth noting that the council only sought responses from residents who live in the proposed conservation area or immediately abutting it (through the site notices). For this reason, there were no widespread social media or council communications to the whole borough as there usually would be in broader consultations.



Survey

- 2.3 The survey was undertaken by 10 registered users. The survey was constructed to be straightforward and simple to respond to, avoiding unnecessary or confusing questions. Four questions were asked; section 3 documents these and the responses. Participants were required to register in order to respond to the survey, this ensures that the respondents are real people with email addresses. The survey can only be responded to once by each registered user.

Online Workshops

- 2.4 No workshops / meetings were held for this consultation. Due to the small number of consultees and the straightforward nature of the consultation these were not considered to be appropriate consultation tools in this instance.

Written Submissions

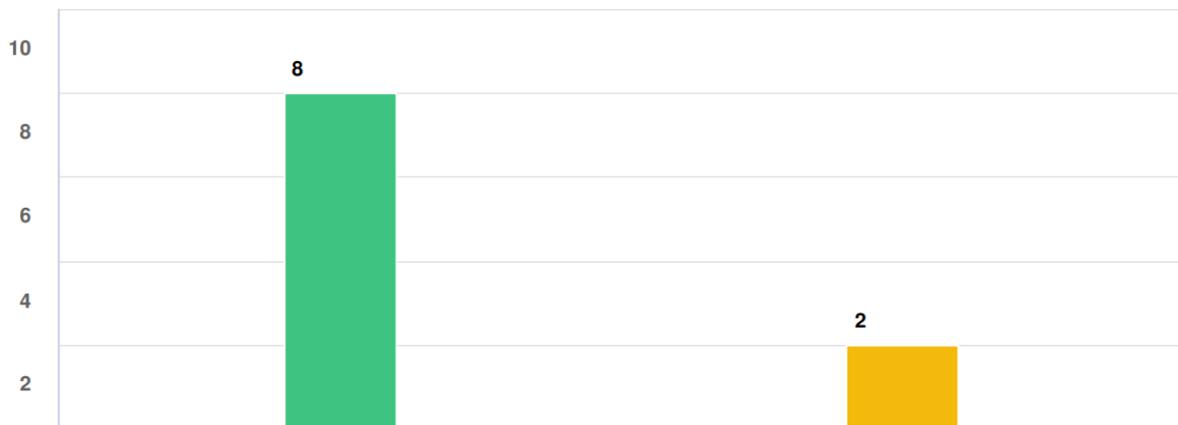
- 2.5 The Council received six written submissions via email (LDF@harrow.gov.uk) over the consultation period. One written response argued against the inclusion of their property in the conservation area as it was of the same style and era of newer buildings that had been excluded from the proposed conservation area. The inclusion of this property should be examined in further detail. Three written submissions supported the adoption of the conservation area in its current state and expressed concern that the designation was ever removed. One other response objected to the designation of the conservation area on architectural grounds stating that many of the houses have been altered or modernised significantly and no longer reflect the original architectural styles.
- 2.6 A response was also received from Historic England, who are the Government's advisors on heritage. They noted that 'Overall the area is not notable for its local architectural or historic significance'. The response will be addressed in any formal report as to whether designation should proceed.

3. Consultation Findings

Survey Findings

3.1 The survey comprised of four simple ‘Yes or No’ check box questions. The first question asked respondents ‘Do you live in the proposed conservation area?’ The response was mandatory to proceed with the survey. Of the 10 respondents, 8 lived within the conservation area and two did not, stating that they lived nearby. A graph of the responses is shown below.

Q1 Do you live in the proposed Conservation Area? (Shown in the green boundary)

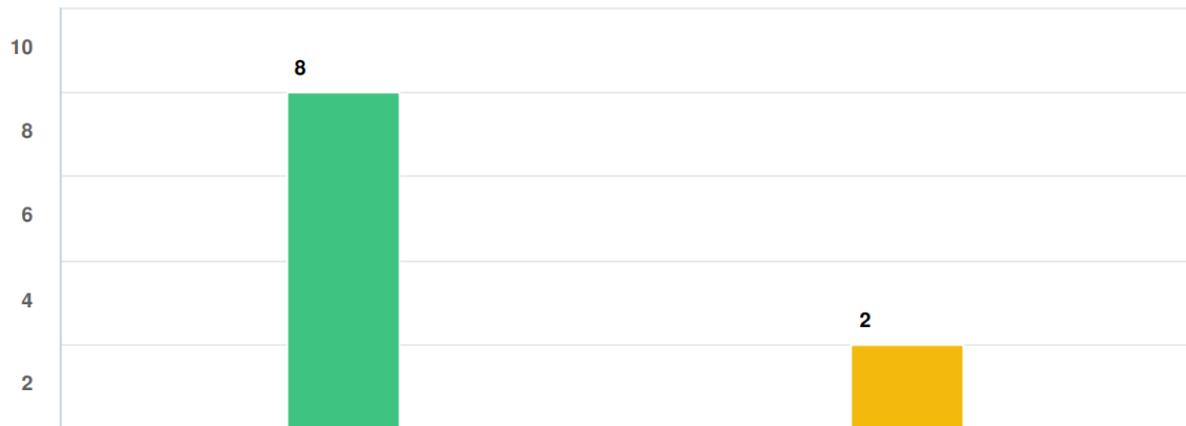


Question options

● Yes ● No (If no, please tell us what your interest is in the consultation)

3.2 The second question was also a mandatory question with a ‘Yes or No’ answer. The question asked respondents ‘Do you support the inclusion of West Drive and Bellfield Avenue in a new Conservation Area?’. Of the 10 respondents 8 selected ‘Yes’ in support and 2 selected ‘No’ in opposition. A graph of the responses is shown below.

Q2 Do you support the proposed inclusion of West Drive and Bellfield Avenue in a new Conservation Area?

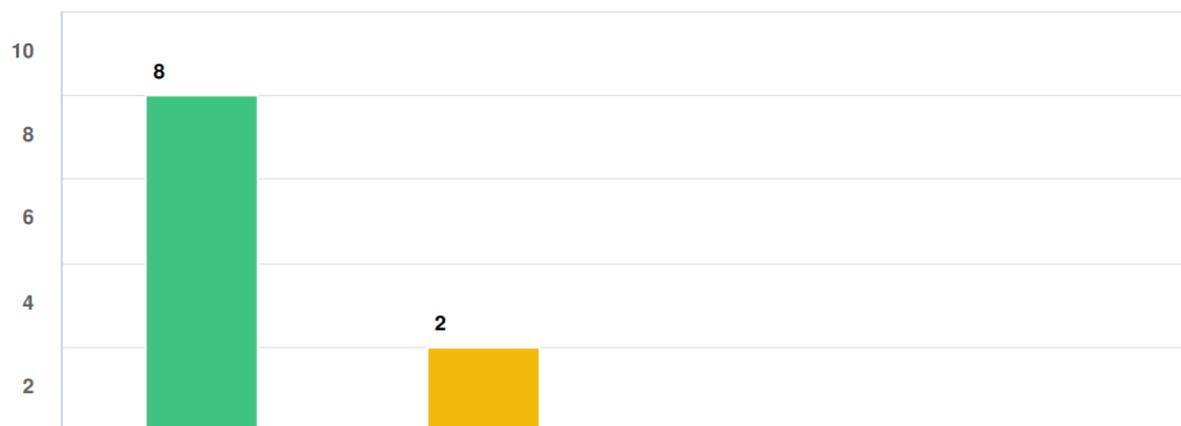


Question options

● Yes ● No

3.3 The third question was also a mandatory question with a 'Yes or No' answer. The question asked respondents 'Noting the criteria for Conservation Areas below, do you agree with the Council's recommendation to include West Drive and Bellfield Avenue in a conservation area?' The potential responses were 'Yes', 'No', 'No opinion' and 'Partially'. Of the 10 respondents 8 responded 'Yes' and 2 responded 'No'. A graph of the responses is shown below.

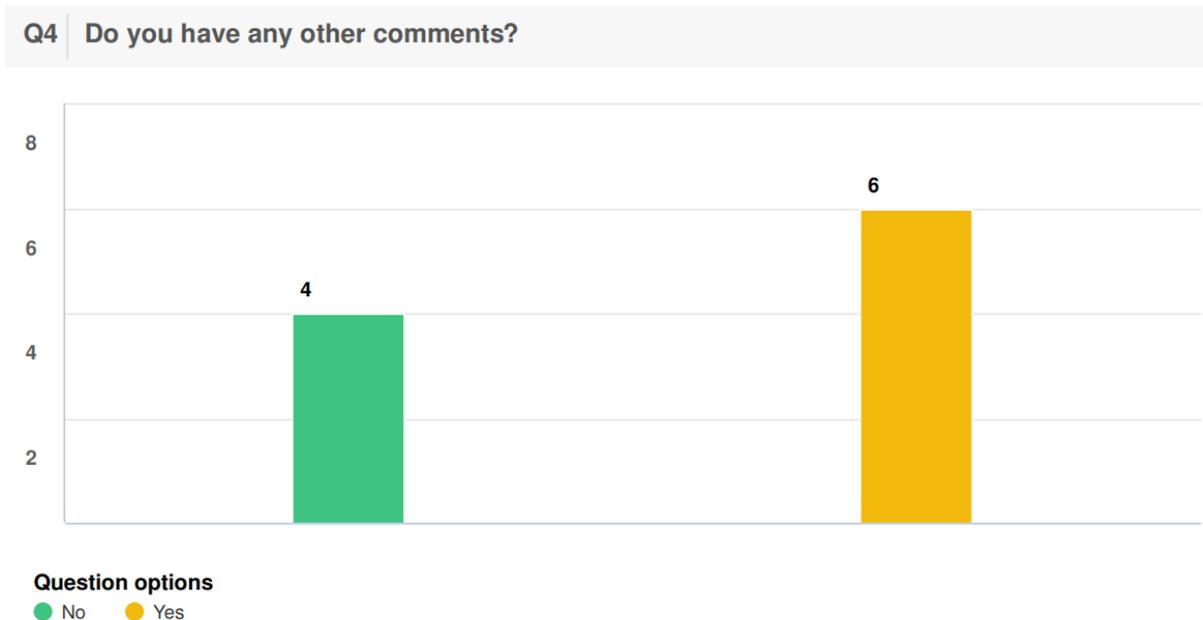
Q3 Noting the criteria for Conservation Areas below, do you agree with the Council's recommendation to include West Drive and ...



Question options

● Yes ● No ● No opinion ● Partially (please specify)

3.4 The final question was not mandatory and asked respondents 'Do you have any other comments?'. Of the 10 respondents 4 had no additional comments, and 6 had additional comments. The graph below shows the responses.



- 3.5 The additional comments from the 6 respondents were as follows:
- a) *West Drive was originally within the Conservation Area before being removed as an act of political spite.*
 - b) *The 2 houses at the entrance of West Drive on both side of the street should be included in the conservation area as they would qualify of significant architectural interest.*
 - c) *The road does not have a high concentration of listed buildings, has no historical or architectural history left. Many of the houses have been modernised and there is no group of buildings with distinct physical identity. I do not see the benefit therefore for including this in a conservation area.*
 - d) *I feel this area does not have the criteria above to meet a conservation zone. I.e., many of the houses are newly renovated and extended with no original architectural value or distinct physical identity or any historical value. So I would strongly disagree with this proposal as it does not fulfil any of the criteria.*
 - e) *Both Bellfield Avenue and West Drive are representative of vernacular suburban architecture of the 1930s with a leafy relaxed atmosphere. There is a distinct physical identity and cohesiveness. The roads are often enjoyed by outsiders walking or running. The risk is that this identity will be increasingly destroyed by unsympathetic modernisation, greater hard-standing, more extensions and, worst, by demolishing and*

replacing the existing housing stock. The Conservation Area will help prevent that happening.

- f) *This area has a distinct physical identity and cohesiveness. It was intended to have a variety of styles of architecture of the properties.*

4 Conclusion

- 4.1 There is clear support for the proposed designation of the West Drive and Bellfield Avenue Conservation Area, although there is also some opposition. The majority of the respondents supported the proposed conservation area although there were some residents who believe that their houses should not be included on character grounds. An evaluation of the responses that opposed the designation will be undertaken and the border of the proposed conservation area may be altered depending on the merits of the suggested changes..
- 4.2 While rates of response for this consultation may be low in the context of a whole borough consultation, it does provide useful feedback on the proposed designation. As 99 households were directly contacted and 8 people who live in the proposed conservation area responded to the survey, and 4 people who live in the proposed conservation area submitted written responses, we have a response rate of 12.2%. It should also be noted that the page had high levels of engagement overall with 179 page visits and 61 informed visitors despite not receiving any multi-channel publicity.