

Appendix 3

Consultation Feedback

This includes:

Written responses, feedback received at the consultation events, detailed feedback received from amenity groups and Registered Providers.

APPENDIX 3: SUMMARY OF CONSULTATION RESPONSES

This document provides details of consultation responses received from the following:

- Residents of Driffield Road and Medway Conservation Areas.
- Residents of other Conservation Areas.

Local resident responses

Overall, 55 responses from residents of Driffield Road and Medway Conservation Areas were received. Of these, 65% supported a more permissive approach to mansard roof extensions. The main reason given is that this approach would support social cohesion by allowing growing families to remain the area.

Those who objected were concerned about the harm mansard roofs will have to the character of the conservation areas. A more detailed breakdown of the responses is provided below:

SUMMARY OF CONSULTATION RESPONSES					
	Support		Object		Total
	No.	%	No.	%	
Driffield Road	25	69	11	31	36
Medway	17	89	2	11	19
Total	42	76	13	24	55

Driffield Road

The total for this conservation area is 36 (including anonymous responses). A breakdown of these responses is set out below.

Supports

The 25 responses supported the proposed character area appraisals and mansard roof options i.e. would like a more permissive approach. All gave the following reason:

“extending family homes is necessary for social cohesion (e.g. it allows families to stay in the area)”.

Objects

The 7 responses received objected to the proposed character area appraisals and mansard roof options i.e. do not want to see a more permissive approach. All gave the follow reason:

“mansard roofs will harm the character and appearance of the conservation area”

Anonymous reponses

There were 4 anonymous responses relating to this area.

Supports

None.

Objects

4 objections were received. The reason for all four objections was that mansard roofs would harm the character and appearance of the conservation are

Medway

The total for this conservation area is 19 to include anonymous responses. A breakdown of those who supported the approach and those who objected is set out below.

Supports

All 15 responses supported the proposed character areas appraisals and mansard roof options i.e. would like a more permissive approach.

All responses gave the following reason: “extending family homes is necessary for social cohesion (e.g. it allows families to stay in the area)”.

One of the supporting emails did emphasise that this support was on the proviso that the historic character is retained. They went further to comment that the rear of the proposed mansard is less important in terms of visual effect on the historic character of the area. They felt that the decision on this element should be based on the impact on neighbouring properties and amenity.

Comments were received at the last consultation event showed concern for the uniformity of the roofscape, the desire to tie in the re-instatement of original architectural features as part of an application for a mansard roof extension.

Objections

The total objections for this area is 2.

All two objections gave the following reason:

“mansard roofs will harm the character and appearance of the conservation area”

Anonymous responses

There were 2 anonymous responses for this area. Both were supportive of a more permissive approach stating the follow reasons:

- Necessary for social cohesion
- Mansards are a traditional and sympathetic addition to historic buildings

Responses from residents in other conservation areas

The total number of responses from residents of other conservation areas remains at 3 (1 from Jesus Hospital and 2 from Tredegar Square). All of these responses were supportive of a more permissive approach to mansard roof extensions.

APPENDIX 3 : Feedback received at the three consultation events

Consultation event on 26 July 2016.

- 1.1 The event was held at Roman Road Idea Store and was attended by Tower Hamlets officers and the project consultants, Alan Baxter Associates and Kennedy O'Callaghan Architects.
- 1.2 The event went smoothly and the venue allowed the consultation materials to be displayed easily.
- 1.3 The attendance sheet was signed by 18 people.

Feedback received by consultants

- 1.4 The consultants were asked to provide feedback received at the event and this is set out below:

“Kennedy O’Callaghan Architects and Alan Baxter Ltd (ABA) attended the public consultation exercise held at Bow Ideas Store on 28 July 2016. ABA’s assessments of the characteristics of the Driffield Road and Medway Conservation Areas were displayed alongside Kennedy O’Callaghan’s design options for roof extensions, and maps of both conservation areas showing existing roof extensions and rear extensions.

All of the members of the public who attended the consultation session and spoke to ABA representatives were owners of houses in the conservation areas. They were knowledgeable about their own properties and their neighbourhoods in general, and committed to preserving the character and appearance of the conservation areas – although not all agreed that roof extensions were desirable. The conversations indicated general awareness of the importance of the parapet and cornice as a unifying element in long views down the streets, and of party wall upstands and chimneystacks in providing a rhythm to the terraces.

Of the six people who discussed the draft guidance with ABA representatives, two were determinedly opposed to any roof extensions anywhere in the conservation areas. They disagreed with roof extensions in principle, and therefore were not concerned with the differences between the design options presented. Three were interested in how their own houses might be extended into the roof, and were among several consultees who asked the architects about the design and method of construction, in some detail. The suggested typical layout plan showing a double bedroom and bathroom was of particular interest. One consultee did not disclose a personal view about the desirability of a more permissive attitude to roof extensions but was interested in the possibility of restoring elements of the front elevation such

as cast-iron railings, and whether consent to extend might be made conditional upon this kind of improvement”.

Feedback received by LBTH Officers

- 1.5 Officers recorded a mixed response from those who attended the event. However, most were in favour of a more permissive approach to mansard roof extensions citing the following reasons:
- Allow growing families to remain in the area.
 - That over time they would become part of the character of the conservation area as it evolved and adapted to changing demands.
- 1.6 Those who did express objections/concerns did so for the following reasons:
- Would harm the character of the conservation area.
 - Piecemeal approach to building mansards would harm the character of the conservation area.
 - The splitting of family homes into two flats or more.
- 1.7 Many were pleased to see actual design options for mansards roof extensions and discussed these options at length with Kennedy O’Callaghan Architects. The refreshed appraisal documents and management guidelines were available but there seemed to be little appetite to read those documents.
- 1.8 There was a general assumption that the decision to allow mansards had been made. Officers did inform attendees that this was not the case. There was still a process to be followed which would need to look at assessing harm, taking further legal advice and considering the equalities issues before any decision could be made.
- 1.9 Residents from other conservation areas said they were interested to see the outcome of this consultation and the implications it would have for them.

Consultation event on 16 August 2016

- 1.10 The event was held at St Paul’s Church on St Stephens Road and was attended by Tower Hamlets officers and the project consultants; Alan Baxter Associates and Kennedy O’Callaghan Architects.
- 1.11 The event went smoothly and the venue allowed the consultation materials to be displayed easily.
- 1.12 The attendance sheet was signed by 4 people, however, a total of 7 people attended the event.

Feedback received by consultants

- 1.13 The consultants were asked to provide feedback received at the event and this is set

out below:

“Kennedy O’Callaghan Architects and Alan Baxter Ltd (ABA) attended the public consultation exercise held at St Paul’s Church, Old Ford Road on 16 August 2016. The materials on display were the same as those at the previous consultation session: ABA’s assessments of the characteristics of the Driffield Road and Medway Conservation Areas, Kennedy O’Callaghan’s design options for roof extensions, and maps of both conservation areas showing existing roof extensions and rear extensions.

7 members of the public attended (plus the vicar); all were owners of houses in the conservation areas. Most were interested in how their own houses might be extended into the roof, and asked the architects about the design and method of construction, in some detail. One newly-wed couple were interested in extending their 1st floor flat to allow them to stay in the neighbourhood. Another couple were opposed to the principle of Mansard roof extensions at the first consultation but felt reassured by the prototype designs if they were implemented with consistency and attention to detail. However they expressed a concern that roof extensions might lead to further sub-division of housing units. One consultee did not oppose mansard roof extensions on grounds of appearance but expressed concern that an additional floor would inevitably lead to an increase in population and this would increase demand for on-street parking which was currently at full capacity. One consultee was interested in the potential of a roof extension making it possible to divide her house into two flats, as a way of funding her retirement. (This point was raised at the 1st consultation.)

Feedback received by LBTH Officers

1.14 Officers recorded a mixed response from to those who attended the event. However, most were in favour of a more permissive approach to mansard roof extensions citing the following reasons:

- Allow growing families to remain in the area.

1.15 Those who did express objections/concerns did so for the following reasons:

- The splitting of family homes into two flats or more and that would degrade the character of the area as a result of increased parking, different front elevation treatments e.g. windows.
- The increase of on street parking as a result of increased size of family homes and/or the potential of sub division.
- The disruption caused by associated works if people went forward with mansard roof extensions.

1.16 Residents were pleased that the appraisals were being revisited. Many were pleased

to see actual design options for mansards roof extensions and discussed these options at length with Kennedy O'Callaghan Architects. The refreshed appraisal documents and management guidelines were available but there seemed to be little appetite to read those documents. However, there was overall praise for the quality of the material available.

- 1.17 There was a general assumption that the decision to allow mansards had been made. Officers did inform attendees that this was not the case. There was still a process to be followed which would need to look at assessing harm, taking further legal advice and considering the equalities issues before any decision could be made.

Feedback from the consultation event on 7 September

- 1.18 The event was held at St Pauls Church on St Stephens Road and was attended by Tower Hamlets officers and the project consultants; Alan Baxter Associates and Kennedy O'Callaghan Architects.
- 1.19 The event went smoothly and the venue allowed the consultation materials to be displayed easily.
- 1.20 The attendance sheet was signed by 15 people.

Feedback received by consultants

- 1.21 The consultants were asked to provide feedback received at the event and this is set out below:

Kennedy O'Callaghan Architects and Alan Baxter Ltd (ABA) attended the public consultation exercise held at St John's Church on St Stephen's Road on 7 September 2016. ABA's assessments of the characteristics of the Driffield Road and Medway Conservation Areas were displayed alongside Kennedy O'Callaghan's design options for roof extensions, and maps of both conservation areas showing existing roof extensions and rear extensions.

At least fifteen people attended this consultation and most were very engaged with representatives from the Council and Kennedy O'Callaghan Architects. The majority were owners of houses or flats in the conservation areas and they seemed to be knowledgeable about their own properties and their neighbourhoods in general. All were supportive of roof extensions, but voiced different concerns associated with the possible new policy. In summary, some of these concerns were:

- *A resident from Tredgar Square Conservation Area, concerned about what the knock-on effects would be for his own neighbourhood.*
- *Concern of increased pressure on car parking on and around Kenilworth Road.*
- *Worry about HMOs and change in occupiers in the houses- if a fourth floor can be added to a house, for example, it very easily divides into two flats, and is no longer a single home.*

- *A couple of residents wanted the Council to take a more prescriptive approach to mansard roof extensions, and that they should enforce a uniform design across the whole street in order to maintain the uniform character and appearance of the streets.*
- *Two further consultees, who had been actively lobbying the council in favour of mansard roof extensions, argued that applicants should be required to follow the design guidance to maintain design consistency and quality*
- *Two consultees expressed a preference for more individuality in design of the rear of the mansard roof extensions*
- *One resident who was planning to install replacement timber sash windows said she would only do so if she was able to stay in the property, which in her case would mean a mansard roof extension to meet her family requirements. She would also like to explore the possibility of outdoor space at roof level*
- *One consultee asked if they were required to have a hipped gable on a property with an inboard staircase or whether an extended gable, as proposed for properties with outboard staircases, would be acceptable*

There were also questions to the Council about planning process: the process of drafting, consulting on and adopting new policy, and how applications would be assessed should this policy be adopted.

Several consultees (residents and three architects) asked the architects about the design and method of construction, in some detail. A young couple, who had withdrawn an application for a mansard roof extension early this year, discussed Kennedy O’Callaghan’s drawings in some data.

Feedback from LBTH Officers

- 1.22 Those who attended the event on 7 September spent a considerable time talking to officers and the consultant team.
- 1.23 From the responses recorded by officers there was clear support for a more permissive approach to mansard roofs once again citing the following reasons:
- Allow growing families to remain in the area and thereby support social cohesion
- 1.24 However, there was a strong body of opinion at this event that if mansards roofs were allowed they should be uniform in size, use of materials etc.
- 1.25 In addition, some residents wanted a guarantee that general façade improvements (restoration of historic decorative features) would be part of the approval.
- 1.26 Some residents expressed concern that mansards would lead to sub-division, loss of family dwellings and transient communities and unsafe neighborhoods. They were also concerned about how this would affect other conservation areas?

APPENDIX 3: Feedback Received from Amenity Societies

- 2.1 This section sets out consultation responses received from amenity groups in response to the revised conservation areas appraisals and management guidelines document for Driffield Road and Medway conservation areas.
- 2.2 As part of the consultation process the following groups were invited to comment on the revised documents.
- Historic England
 - The Victorian Society
 - The Georgian Group
 - Society for the Protection of Ancient Buildings
 - The Ancient Monuments Society
- 2.3 The draft conservation area appraisals and management guidelines were emailed to the above with a covering letter explaining the background for the consultation.
- 2.4 In addition to inviting them to comment by email two workshops/meetings were set up for a group discussion. Unfortunately none of the above were able to attend on the given dates.
- 2.5 However, written responses have been received from the following groups and a summary of their observations are given.

Historic England

- 2.6 Summary of main issues raised by Historic England is set out below:

We welcome the detailed approach taken by the Council which will better ensure that extensions within the above conservation areas are undertaken to an appropriate standard. However, whilst the specific guidance on alterations demonstrates a considered approach the potential for numerous piecemeal roof extensions has the potential to result in harm to the historic environment. The National Planning Policy Framework sets out the Government's policies for sustainable development, including the core principle of conserving heritage assets in a manner appropriate to their significance. In our view, the Council should consider whether the potential harm to the significance of the conservation areas is outweighed by the public benefits associated with allowing such a change. This should be assessed in accordance with policies 132 to 134 of the National Planning Policy Framework.

- 2.7 Historic England provided detailed comments on the proposals and is set out below:

Both the Driffield and Medway Conservation Areas are significant for their compact Victorian terrace housing. A significant aspect of their character are consistent flat parapets hiding "London roofs", which provides a strong harmony of appearance in many streets. The conservation areas meet at Roman Road and although Medway was largely developed slightly later there remains a strong similarity in character and

appearance. We also note that the Driffield Road Conservation Area demonstrates a very high proportion of survival in terms of historic roof forms, along a strong north south "ladder" of streets. Medway Conservation Area demonstrates a more varied townscape with an apparent wider extent of change and less consistency.

The consultation states that the consideration of a more flexible approach within these conservation areas is based on the apparent level of demand amongst families unable to extend their dwellings, and faced with a lack of alternative affordable alternatives within the borough. Whilst we recognise the considerable pressure on existing housing resources, this does not demonstrate a clear benefit for the historic environment. In our view, there would appear to be merits of retaining a case by case approach which takes into account the immediate context and setting. This would avoid potential harmful precedents and better enable change to be managed. We would however consider that the introduction of better guidance, to ensure that where change is acceptable it is of high quality, to be beneficial.

However, it is the responsibility of the local authority to consider whether wider public benefits are demonstrated and whether these can clearly demonstrate that they outweigh any harm to the conservation area.

In assessing whether to adopt a more relaxed approach to roof extensions the Council should consider the sensitivity to change and whether this establishes harmful precedents for other conservation areas, the drivers for change, and the extent of public benefit. In our view any decision needs to be informed by completeness and quality of townscape, the wider setting in terms of the historic and architectural relationship to residential conservation areas throughout the borough, and the borough-wide policies for housing. The review of eight conservation areas undertaken by the local authority provides a good basis for such an assessment.

Victorian Society

2.8 Victorian Society's comments in summary is set out below:

The desire of residents within two conservation areas to enlarge their homes is noted and the guidance produced in response to this is clearly the result of much thought and deliberation about sensitively managing change in the historic environment. However, whilst this guidance is intended to minimise harm and a loss of character, conceding a blanket allowance of upward extensions within these Conservation Areas would entail a high level of cumulative harm in the long run. We therefore have a number of reservations about the principle of such a change and the potential for this to be a dangerous precedent to set when thinking about the wider picture.

2.9 Victorian Society expanded their comments by providing more detailed feedback on the proposals as set out below:

As identified in the Conservation Area Character Appraisals, it is the uniformity and lack of visible roof that are the key defining characteristics of the mid-Victorian terraces that the new guidance predominantly concerns. The hard, straight edged silhouette of the rooflines would be lost and as Historic England's guidance note 'London Terrace Houses 1660-1860 states "where it is evident that additional floors in any form will harm the architectural integrity of a building, a roofscape or the interest of a group, they should not be accepted" . The terraces in question may fall just outside of this date range, but the issues are the same. It is not possible to provide additional floor without harming their integrity.

Any regularity would also be compromised, as roof extensions will inevitably occur in a piecemeal fashion in any on terrace, should greater flexibility be allowed. Even if the same design is strictly enforced, there will be gaps or isolated extension, where not all residents of a terrace do or do not build roof extensions, for whatever reason. Additionally, most of the terraces are presently without rainwater pipes on their street facing elevations, by design rather than by accident. The ingenuity of the London Roof is such that drain pipes are confined to the rear of the property, allowing the principal facades to retain their strong simplicity. This would also present an undesirable change.

We would prefer these changes not to occur on terraces where there presently are a minority of roof extensions, so that the character of the Conservation Areas is sustained. Nevertheless, pressure for change is appreciable and if it is considered that upward extensions are really a necessity in this locality, we urge that any roof extensions are done across a whole terrace, or section of a terrace at any given time, not in isolated instances. This undoubtedly presents a challenge in terms of co-ordination, but the harm to the historic environment is serious and all reasonable steps must be taken to ensure the best possible outcome for it. We also urge that the reinstatement of lost architectural features such as cornices, railings and timber sash windows are not merely encouraged, and are instead a compulsory element of any consent for a roof extension. This would help offset the harm as a real enhancement of the Conservation Areas. However, uniformity is again key and the positive effect of such reinstatement will only be very limited if they occur in a piecemeal fashion.

With regards to the proposed design guidance and prototypes for roof extension, we consider this to be well thought approach that sets out mansard extension in a near a sensitive way as possible, if the principle is to be conceded.

2.10 No responses were received from the other amenity groups.

APPENDIX 3: Feedback from Registered Providers

- 3.1 This section sets out consultation responses received from Registered Providers in the two Conservation Areas in response to the revised conservation areas appraisals and management guidelines document for Driffield Road and Medway conservation areas.
- 3.2 Registered Providers who own housing stock (Tower Hamlets Homes and Circle Housing) in the two Conservation Areas were also contacted during the public consultation exercise, both choosing to neither support nor reject proposals for a more permissive approach to mansard roofs. In addition, neither stated that they had any immediate desire to add roof extensions to their properties.
- 3.3 However, Tower Hamlets Homes did note that this may enable them to improve the number/choice of homes they were able to offer. Their response is set out below:

Whilst we do have street properties which might be potentially be affected in the Medway area, we don't have any formal comment to make at this stage. Clearly any relaxing in planning restrictions might allow for cheaper delivery choices/standards which by definition increases investment in LBTH stock.

Appendix 4

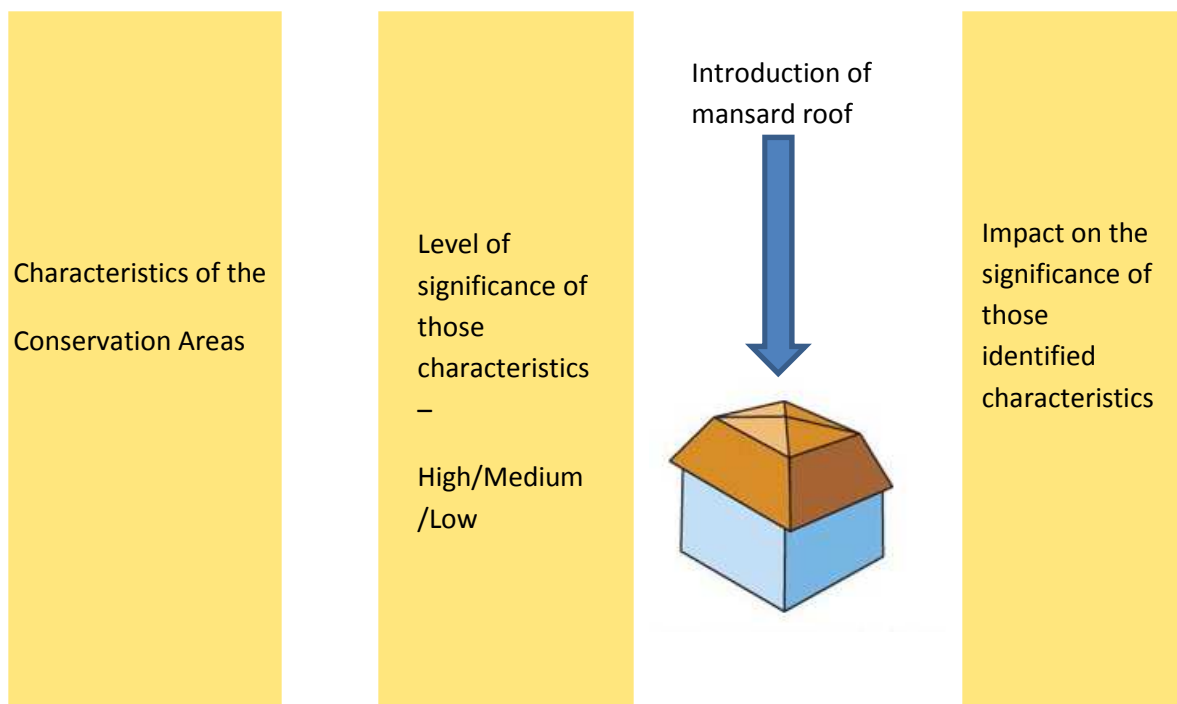
Methodology for Assessing Harm against Public Benefit of the Proposals

Methodology for assessing harm against public benefit - 8th Aug 2016

1. Approach to assessing harm against public benefit

a. Assessing harm

- Review of relevant legislation and establishing what it says about harm
- Defining harm
- How assessment of harm differs - listed building versus conservation area
- Characteristics of the area (specific to Driffled Road and Medway CA) and assessing significance of those characteristics
- Characterising proposals – mansard roofs
- How the proposals impacts on existing characteristics and their significance (see diagram below)



b. Weighing public benefit

- How public benefit is defined and understood
- Difference between private benefit / public benefit
- Role of public benefit in weighing planning policies
- What planning mechanisms have been used to balance public benefit in planning decisions- S106/Article 4s/relevant planning mechanisms
- Specific benefits of mansards in the context of this project

- What we know about the area (level of family homes, home ownership, if properties have been subdivided, number of bedrooms in 2 /3 storey houses in the two CAs, potential for extensions(rear/roof/basement)

2. Methodology for weighing harm against public benefit

- a. Template for assessment based on 1a & 1b (attached)
- b. Further work to support the methodology
 - Case studies and appeal decisions in Tower Hamlets dealing with assessing harm to a CA versus public benefit
 - Review of appeals specific to Driffield Road and Medway
- c. Project Group Meeting- review the work with officers/consultants /external stakeholders(Historic England and others) on a biweekly basis

3. Equalities impact Assessment

- a. Incorporating Equalities Impact Assessment work as part of the methodology
- b. Implications of this work on other conservation areas in the borough

Appendix 5

Assessment Report

APPENDIX 5: ASSESSMENT OF HARM AGAINST PUBLIC BENEFIT

1. OVERVIEW

1.1. Purpose of this document

1.1.1. This document is an appendix to report to Cabinet on Revised Character Appraisals for the Driffield Road and Medway Conservation Areas. It provides a detailed appraisal of the potential impacts arising from adopting a more permissive approach to the consideration of planning applications for mansard roof extensions in the Driffield Road and Medway conservation areas. The document also considers the possible public benefits that may arise from a more flexible approach and weighs these against the potential harm identified in accordance with the established planning decision making framework.

1.2. Findings

1.2.1. This report concludes that :

- Adopting a more permissive approach to mansard roof extensions would result in less than substantial harm to the significance of the Driffield Road and Medway conservation areas.
- Some public benefits in the form of supporting social cohesion and improving social capital, improving building façades and supporting/creating construction jobs may arise. However, the nature of these benefits means that they are presently unquantifiable and can therefore only be given limited weight in the decision making process.
- In order to comply with statutory duties in relation to preserving designated heritage assets, local planning authorities must attach 'considerable importance and weight' when weighing any identified harm against the public benefits of this proposal.
- In view of the relative weight attached to the harm and the public benefits, adopting a more permissive approach to mansard roofs is not considered to be the most appropriate course of action.

2. DECISION MAKING FRAMEWORK

2.1. Development in conservation areas

2.1.1. This section sets out the decision making framework relating directly to the consideration of development in conservation areas. It should be noted that other policy considerations

may also apply as part of any decision making process, notably the protection of other non-designated heritage assets (such as listed buildings) and the protection of residential amenity.

2.2. Statutory

2.2.1. The Council, as local planning authority, has a duty under section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 to determine applications for planning permission in accordance with the development plan.

2.2.2. In addition, section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 requires local planning authorities, in exercising their planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

2.3. Policy

2.3.1. Section 12 of the National Planning Policy Framework (NPPF) sets out the national planning policies for the conservation and enhancement of the historic environment. The objective of these policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances their significance.

2.3.2. Annex 2 (Glossary) of the NPPF also identifies conservation areas (and listed buildings) as designated heritage assets. Paragraphs 132 to 134 of the NPPF set out a sequenced decision-making structure applicable to development affecting conservation areas, as designated heritage assets. Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

2.3.3. Paragraph 133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or if certain other specific criteria are met. Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

2.3.4. The determination of whether or not a more permissive approach to mansard roofs will result in harm to the significance of the conservation areas in question, and the degree of any such harm (substantial or less than substantial), is a matter of judgement. However, the Conservation Area Character Appraisals and Management Guidelines provide useful tools to assist with this (see below under paragraph 2.5.4). Where it is determined that any harm would be less than substantial, and that the test under paragraph 134 is relevant, it should be applied having regard to the requirement, under section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. That is, all elements of the planning balance should not be given equal weight but that considerable importance and weight should be given to any harm identified.

2.4. Regional

2.4.1. The London Plan Policy 7.8 (Heritage Assets and Archaeology) states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

2.5. Local

2.5.1. The Core Strategy (CS) Policy SP10 states the Council will protect and enhance a range of heritage assets and their settings, including conservation areas. It also states that the Council will preserve or enhance the wider built heritage and historic environment of the borough, enabling the creation of locally distinctive neighbourhoods. In particular, by promoting and implementing placemaking across the borough to ensure that the locally distinctive character and context of each place is acknowledged and enhanced.

2.5.2. The Managing Development Development Plan Document (MD DPD) Policy DM24 (Place-sensitive design) states that development will be required to be designed to the highest quality standards, incorporating principles of good design, including ensuring design is sensitive to and enhances local character.

2.5.3. MD DPD Policy DM27 (Heritage and the historic environment) development will be required to protect and enhance the borough's heritage assets and their significance as key elements of developing the sense of place of the borough's distinctive 'places'. It also states that applications for alteration or extension within a heritage asset will only be approved where it does not result in an adverse impact on the character, fabric or identity of the heritage asset or its setting; it is appropriate in terms of design, scale, form, detailing

and materials in its local context; and it enhances or better reveals the significance of the asset or its setting.

- 2.5.4. In the context of development in conservation areas, the above policies are supported by the Conservation Area Character Appraisals and Management Guidelines (CACAAMG). These documents are a useful tool that describe the special interest of each of the boroughs conservation areas and provide a greater understanding and articulation of their special character and appearance. As adopted documents, they are a material consideration in the determination of planning applications.

3. IDENTIFICATION AND ASSESSMENT OF HARM

3.1. Harm to conservation areas

- 3.1.1. To assess harm to a designated heritage asset it is first necessary to consider its significance. Annex 2 (Glossary) of the NPPF defines 'significance' as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”

- 3.1.2. Historic England’s guidance document *Conservation Principles (2008)*, which is aimed at supporting the quality of decision making, identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. These values can be considered as another way of analysing the significance, and can help in deciding the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.
- 3.1.3. In the case of conservation areas, their significance derives from their special character and appearance. They are *areas* of special interest, that is, the significance is not found in one single building or view but in the sum of their parts.
- 3.1.4. The Driffield Road and Medway conservation areas possess aesthetic value in the rhythm and uniformity of the homogenous layout of streets, as well as the variety of ornamental detail. Their communal value derives from the fact that the physical fabric of the conservation areas has provided a backdrop for resident’s lives over many years and features in community memories. The way that the conservation areas can be seen to

have developed over time demonstrates their historical value. The evidential value of the conservation areas comes from the way that they yield evidence about past human activity. For example, the name and dates plaques that allow you to identify the design details of a particular time, such as decorative ironwork or the details of the roof structure.

- 3.1.5. To explore the impact on the significance of the Driffield Road and Medway conservation areas in more detail, an appraisal of all the main character elements has been carried out. The main character elements appraised are those set out in the draft refreshed versions of the character appraisals documents, which provide the most up-to-date assessment of the character of the conservation areas. Whilst this appraisal is not an exhaustive examination of the character, it does, nonetheless, address the main elements that may be affected by the addition of mansard roofs to buildings in the conservation areas.
- 3.1.6. The appraisal is presented in Table 1, with each character element considered in terms of the degree to which they may be affected by the addition of roof extensions to properties in the conservation areas. The assessment has been carried out on the basis that the roof extension would be in the form of the least harmful option presented in the Draft Character Appraisals and Management Guidelines (Option1 Revision A: double pitched mansard with 300mm setback). The similarities between the character of the two conservation areas, which sit either side of Roman Road and are in parts contiguous, is such that it is appropriate to consider them together in one table.
- 3.1.7. Each character element has been assessed in terms of its sensitivity, significance, degree of change and the overall effect of this change.
- 3.1.8. Sensitivity is an assessment of the degree to which the character element would be altered by the introduction of a mansard roof. It is categorised as low, medium or high.
- 3.1.9. Significance is the consideration of how important the character element is to the character of the conservation area as a whole, bearing in mind that the designation of the conservation area is to protect its special character and appearance, as opposed to any one particular building. The significance must reflect the consistency of the character element throughout the area, the degree to which there has been any change, the extent to which alteration to that element would impact on the character of the conservation area and the degree to which it might be evident on a quick glance down the street. Significance is expressed as high, medium or low.

3.1.10. The degree of change to which that character element would be subjected, by the introduction of a mansard roof is categorised as major, moderate, minor or none.

Table 1: Assessment of effect of mansard roofs on character elements				
Character element	Sensitivity	Significance	Degree of change	Effect
Small-scale houses	Medium – modest artisan houses were never intended to have a roof storey.	High – a key element of the character is the modesty of the scale of the houses.	Moderate – caused by an additional storey.	Major harm
Consistency of parapet roofline, concealed roof and the horizontal emphasis that this creates	High - this ties groups of properties together, despite the variation in architectural details	High – it has a large impact on street views throughout the conservation area	Major - a mansard roof will interrupt the parapet line, and detract from the horizontality.	Major harm. This may reduce over time as the number of mansards increases and a degree of consistency is once more established.
Valley gutter, expressed on the rear elevation	High - clear indication of the historic London roof	Medium – it is not visible from the public realm, although visible from neighbouring properties	Major – it would result in the loss of the distinctive valley gutter profile	Major harm– can be mitigated to moderate by the retention of the expressed 'V' as demonstrated in the least harmful mansard option
Silhouetted chimneys	High - clear indication of how the houses were lived in historically	Medium - often more visible from the rear of the property	Moderate - chimneys are often removed in the addition of a mansard	Major harm – can be mitigated to moderate by building up the chimneys as part of the mansard proposals

Uniformity	High - despite variations in architectural detail the terraces have an overall feeling of uniformity	High – consistency, regularity and repetition highlighted as important within the appraisals	Major - ad hoc addition will interrupt uniformity	Major harm – potentially reducing over time as more mansard roof extensions are introduced and a degree of uniformity is reinstated.
Historic character	High - terraces appear much as they did historically	High	Moderate - however the change will not obliterate the historic integrity	Moderate
Long views	High	High	Moderate - interruptions to the horizontality and consistency of the parapet line	Moderate harm
View from canal towpath [Driffield Road Conservation Area only]	Medium	Medium	Moderate	Moderate harm - this is a back elevation and substantial alterations are already visible
Materials	Medium	High	Minor	Minor harm - the change to materials is confined to the roof extension and the preferred mansard option uses traditional materials.

Doors and windows	Low	High	None	No effect – or moderate improvement with package of mitigation measures.
Railings	Low	High	None	No effect – or moderate improvement with package of mitigation measures.
Variety of architectural details to include, architectural mouldings, foot scrapers, ironwork on window cills, name and date plaques etc.	Low	High	None – these elements will remain unaltered regardless of what happens at roof level	No effect
Downpipes	High - drainage is currently down the rear of the buildings, the introduction of a mansard will result in the introduction of downpipes on the front elevation	Low	Moderate	Moderate to major harm – but can be limited to moderate harm by careful management.

3.1.11. The appraisal in Table 1 demonstrates that the application of a mansard roof to properties in the Driffied Road and Medway Conservation Areas will, in many instances; result in harm to those elements that are of greatest significance to overall character of those conservation areas. However, the table also recognises that the harm can, to some degree, be mitigated with appropriate detailed designs and a package of mitigation measures might support this.

3.2. The extent of harm

3.2.1. Table 1 presents an assessment of the harm to the significance to the two conservation areas that would arise from the introduction of a more permissive approach to mansard roof extensions. Depending on the number and distribution of mansard roof extensions introduced to the conservation areas, the extent of this harm will vary both spatially and temporally. Harm to some elements of the significance of the conservation areas, such as the increase in scale of the small-houses and the loss of traditional roof structures, would increase as more and more roof extensions are introduced. However, other elements of harm, such as changes to the uniformity of the terraces, and a decline in the consistency of the roofline may improve over time, if the number of mansard roof extensions increases and uniformity is reintroduced.

3.2.2. It is difficult to predict the exact number of residents that will choose to extend their homes in this way, and how these extensions would be distributed across the conservation areas. During a public consultation that took place between July and September 2016 a number of residents advised the Council that they were supportive of a more permissive approach to mansard roof extensions. The number of residents who responded to the public consultation in this way (36 people) is a low proportion of the total number of properties located in these conservation areas (1,535 properties). The reason for this number of responses may be related to the relatively low proportion of owner occupiers in the conservation areas (558 properties out of 1,535). On the other hand, 519 properties in the conservation areas are owned by two registered providers (housing associations). These organisations were also contacted during the public consultation exercise, both choosing to neither support or reject proposals for a more permissive approach to mansard roofs. In addition, neither stated that they had any immediate desire to add roof extensions to their properties. However, one organisation did note that this may enable them to improve the number/choice of homes they were able to offer. It should be noted that the ownership of the registered providers is distributed randomly throughout the conservation areas. As such, if these organisations did choose to add mansard roof extensions to their properties,

this would not in itself introduce any significant degree of uniformity of roof forms to the conservation areas, as it would not generally be possible to extend a whole terrace at one time.

- 3.2.3. In view of the above, it seems likely that the extent of the harm to the conservation areas would be serious, particularly in the short and medium term where it seems likely that only some properties would be extended, resulting in harm to individual character elements, in particular to the parapet line and the overall feeling of uniformity and consistency that the unbroken parapet line gives. It is difficult to foresee a circumstance whereby mansard roof extensions could contribute to a high degree of uniformity in the conservation areas, except perhaps in the very long-term, when many or all of the properties have been extended. Even then, this would require a high-degree of consistency in the design and construction of roof extensions, which cannot be guaranteed by the planning system.

3.3. Other harm

- 3.3.1. The appraisal in Table 1 is based on the assessment of possible impacts of the addition of mansard roofs to properties on the character of the two conservation areas. It should be recognised that the addition of a mansard roof to a property may result in other harmful effects that are not considered here. For example, harm to listed buildings or the setting of listed buildings (albeit that there is only one locally listed building in the two conservation areas), harm to non-designated heritage assets or adverse impacts on residential amenity.
- 3.3.2. Where other potentially harmful effects of proposed mansard roofs are identified, these will need to also be taken into account in the decision making process, including the exercise of any planning balance. Here, however, assessment is carried out without reference to any other effects, so as to understand the baseline degree of harm to the significance of the conservation areas.

3.4. Conclusion on harm

- 3.4.1. Overall the harm that would occur is considered to be less than substantial. As such, it should be weighed against the public benefits of the proposal in accordance with paragraph 134 of the NPPF.
- 3.4.2. The harm to the conservation areas is nonetheless likely to be serious, particularly in the short(0-10yrs) to medium term(10-20yrs). There is, however, a prospect that harm would be lessened in the long-term(over 20yrs) if a new sense of uniformity is established. Although, this is unpredictable and cannot be guaranteed.

4. IDENTIFICATION AND ASSESSMENT OF PUBLIC BENEFITS

4.1. Public benefits

4.1.1. The Government's Planning Practice Guidance (PPG) states that public benefits can be anything that arises from a development that delivers economic, social or environmental progress, as defined by paragraph 7 of the NPPF.

4.1.2. The PPG also states that public benefits may include heritage benefits, such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risks to a heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

4.2. Public v. private benefits

4.2.1. The PPG is clear that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

4.2.2. Private benefits are considered to be those received by an individual or a private business. Private benefits include, but are not limited to, monetary reward. In the case of roof extensions in the Driffield Road and Medway conservation areas; the benefits of increased floor space, and subsequent benefits to family life, are considered to be private benefits. As would be the increased value of the extended property.

4.3. Public benefits potentially gained from mansard roof extensions

4.3.1. Table 2 sets out an assessment of the potential public benefits that may arise from adopting a more permissive approach to mansard roof extensions in the Driffield Road and Medway conservation areas. Table 2 uses the definition of public benefits, as described above, to understand the potential outcomes from allowing mansard roofs and to evaluate the weight that these outcomes can be given in the decision making process.

Table 2: Assessment of benefits potentially arising from mansard roof extensions				
Benefit	Does it deliver economic, social or environmental progress?	Does it flow from the proposed development?	Is it of a nature and scale to benefit the public at large?	What weight should be given to this benefit?
Support social cohesion	Social progress may result through enabling residents to stay in the area, which consequently may support the development of social capital. However, conversely it may also undermine social cohesion by encouraging buy-to-let investment and/or subdivision of family homes.	It is possible that some improvement to social cohesion will flow from the development. However, some residents may have chosen to remain in the area without a roof extension, or may choose to move away despite being able to build one. Some benefit may also be delivered through less harmful forms of development, such as rear and/or basement extensions. Although, some feedback from the public consultations suggests that these alternative forms of	In nature, improved social cohesion would benefit the public. The scale is unknown, individual cases may deliver minimal benefit, but collectively the impact may be greater.	Limited weight can be given to this benefit. Supporting social cohesion would be beneficial to the public, but the degree to which it would be delivered by allowing mansard roof extensions is unknown. Allowing mansard roof extensions may also be detrimental to social cohesion.

		extension are not as effective at creating successful family accommodation.		
Enable façade improvements	Contributing to protecting and enhancing our built and historic environment.	There is no planning mechanism to guarantee that the benefit will be delivered. It may also be delivered without the need for mansard roof extensions.	In nature, improving building facades would benefit the public. The scale is unknown, individual cases may deliver minimal benefit, but collectively the impact may be greater.	Very limited weight can be given to this benefit. Whilst improved facades would benefit the public, there is no planning mechanism to ensure that these are delivered alongside mansard roof extensions.
Create/support jobs	Contributing to building a strong, responsive and competitive economy.	Yes, some jobs for planners, architects and construction workers may be created or supported by the planning design and construction of mansard roofs. Extended family homes may also support home working.	In nature, creating/supporting jobs will benefit the public. The scale is unknown, individual cases may deliver minimal benefit, but collectively the impact may be greater.	Limited weight can be given to this benefit. Some jobs may be supported or created.

- 4.3.2. Table 2 discusses the potential role that mansard roof extensions can play in supporting social cohesion. A number of residents have told the Council, through public meetings and public consultations, that by being able to extend their homes they would be able to better accommodate their expanding families or respond to other personal circumstances. Consequently, they would be able to remain living in the area. This, in turn, may help to support the development of social capital (the connections between people), which is considered to make a positive contribution to a number of aspects of well-being.
- 4.3.3. The Tower Hamlets Partnership's Community Plan [2015] provides long-term vision for the borough, articulating local aspirations, needs and priorities. Under the theme 'A great place to live', this plan recognises the challenges the borough faces from a growing population. In particular, it notes the problems caused by overcrowding and affordability, which can contribute to residents deciding to move out of the borough. To tackle these issues, the Plan recognises the need to improve existing homes, as well as provide new ones. The Plan also identifies the importance of creating a safe and cohesive community where there will be a safer place where people feel safer, get on better together and difference is not seen as a threat, but a core strength of the borough. The Council's Conservation Strategy [2010] also seeks to promote community cohesion, by increasing community pride, ownership and involvement in heritage. As such, the Council, and its partners, recognise the importance of social cohesion, and the role that housing and the historic environment can play in helping to promote it. However, the assessment in Table 2 notes that there remain questions about the degree to which this will be delivered by adopting a more permissive approach to mansard roof extensions.
- 4.3.4. Table 2 also identifies façade improvements and the creation/support of jobs as other potential public benefits that may arise from a more permissive approach to mansard roof extensions. Overall, the assessment in Table 2 demonstrates that only limited weight in the decision making process can be given to the public benefits that may arise from adopting a more permissive approach to mansard roof extensions in the Driffield Road and Medway conservation areas.
- 4.3.5. One way of securing more quantifiable public benefits might be to consider a section 106 Scheme. No consultation has been carried out upon this option.

5. PLANNING BALANCE

5.1. The NPPF test

5.1.1. The assessment carried out in section 3 of this report concludes that adopting a more permissive approach to mansard roof extensions would result in harm to the significance of the Driffield Road and Medway conservation areas. The harm identified is considered to be less than substantial. Consequently, the test set out in paragraph 134 of the NPPF is appropriate to the decision making process in this instance.

5.1.2. Paragraph 134 states that where a development proposal, in this instance adopting a more permissible approach to mansard roofs, will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

5.2. Relative weight of harm to heritage assets

5.2.1. It is noted above that section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 requires local planning authorities, in exercising their planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. Judgements by the Court of Appeal and the High Court in *East Northamptonshire v. Secretary of State for Communities and Local Government* [2014] (known as the Barnwell Manor case) and *R (on the application of The Forge Field Society and others) v Sevenoaks District Council* [2014] (known as the Forge Field case) have confirmed that in exercising this statutory duty, decision makers should attach 'considerable importance and weight' to desirability of preserving conservation areas. These decisions also confirm that the need to attach considerable importance and weight should apply even where the harm identified is less than substantial.

5.3. Relative weight of public benefits

5.3.1. An assessment of the potential public benefits arising from adopting a more permissive approach to mansard roof extensions is presented in section 4 of this report. This concludes that although some public benefits may arise, the extent to which they might occur is unquantifiable and may only be given limited weight in the decision making process.


5.4. Conclusion on harm weighed against public benefits

5.4.1. In view of the statutory duty to attach considerable importance and weight to the harm to the significance of the Driffield Road and Medway conservation areas, and the limited weight that can be attached to the potential public benefits that would arise, it can be concluded that adopting a more permissive approach to mansard roof extensions would not be compliant with planning policy.

Appendix 6

Equality Analysis Quality Assurance Checklist

EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<p>Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)</p>	<p>Adoption of the of the revised Conservation Appraisals for Driffield Road and Medway Conservation Areas enabling roof extensions</p>
<p>Directorate / Service</p>	<p>Development and Renewal Strategic Planning – Place Shaping Team</p>
<p>Lead Officer</p>	<p>Sripriya Sudhakar – Team Leader (Place Shaping)</p>
<p>Signed Off By (inc date)</p>	
<p>Summary – to be completed at the end of completing the QA (using Appendix A) (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)</p>	<p> Proceed with implementation</p> <p>The general appraisals and management guidelines are directed toward the built fabric and will equally affect the community who live within it irrespective of their characteristics; however based upon the findings of the QA checklist a risk of unintentional but indirect discrimination with reference to the Public Sector Equality Duty (part of the Equality Act 2010) was identified.</p> <p>In respect of the revisions that provide general updates to the character appraisals and management guidelines to allow for better management of the conservation area, the policies are addressed at the built fabric and will affect the community who live within it irrespective of their characteristics.</p> <p>If the more flexible approach to mansard roofs being considered was taken forward, there are potential positive advantages to those living within the Driffield Road and Medway Conservation Areas (including those with protected characteristics). These would not be extended to those with protected characteristics in other conservation areas (who could potentially benefit from such a policy to a greater degree or for different reasons than the general public). This is on the basis that the potential benefits generated from roof extensions in conservation areas other than Driffield and Medway would be</p>

considered as of less value when compared against their potential harm to heritage assets without conducting further area specific assessments, thus residents of other conservation areas are disadvantaged and less likely to receive the positive benefits identified in this checklist. As such there is a risk of discrimination against people with protected characteristics who live in conservation areas which will not benefit from the policy (albeit the discrimination would also apply to some degree to those without protected characteristics in other conservation areas as well).

However, whilst they would not be in as favourable policy position, they would still be capable of applying for planning permission for mansards and any equality considerations which supported the need for the development would need to be considered on a case by case basis by the Council

The policy may result in significant harm to designated heritage assets, Medway and Driffield Road Conservation Areas; and would therefore fail to comply with policies SP10, SP12 and DM27 of the local plan and Goals 1, 2, 6 of the Conservation Strategy. Potential public benefits could address the leading objective of the One Vision for Tower Hamlets, Policy SP06 of the Borough's Core Strategy; Goals 3 and 5 of the Conservation Strategy.

It is worth noting that the way in which the Council could seek to secure some of the public benefits that have been identified as possible through a package approach, which might go some way to offsetting the identified harm to the conservation area, has not been fully developed or consulted on. Further work is required if some of these potential public benefits are to be secured in order to fully explore the options and consult on the same. However, this is not considered to have any particular additional relevance to equalities.

The mansard roof policy (if adopted) will result in unconditional private benefit of property value uplift in Driffield and Medway Conservation Areas which would also benefit those with protected characteristics. These benefits would also extend to all those within the conservation areas Driffield Road and Medway Conservation Areas but would not be extended to those in other conservation areas.

On the information available it is not considered that a full EA needs to be undertaken. Whilst the new more flexible approach to mansard roofs being considered has some limited potential to have a positive impact on those with

	<p>protected characteristics living within the Driffield Road and Medway conservation areas these are not considered to be far reaching and there will also be benefits to all those living within these areas, when compared to those living within other conservation areas. On this basis the impacts are considered indirect and an unintended consequence of the change in policy. For those living in other conservation areas, the status quo would be retained and they will be no worse off than they currently are.</p> <p>In order to assess the extent of any positive or negative equality impacts the Council can:</p> <ol style="list-style-type: none"> 1. Set a 5 year monitoring period for the policy implementation in the pilot areas to identify the number and quality of extensions constructed; quantify the public benefits generated in due course. As part of this the Council could seek to assess the positive and negative impacts on those with protected characteristics (although it is recognised below that obtaining the information on this final aspect could be difficult).
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Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	YES	<p>The Council has in place a Conservation Strategy and the Strategy is aligned with the Borough's Core Strategy 2025. The Conservation Strategy contributes to the key priorities of the Tower Hamlets Community Plan 2020. The proposal would have negative impact on significance of heritage assets and therefore would fail to address the following policies of the Local Development Framework :</p> <ul style="list-style-type: none"> - SO22 of the Borough's Core Strategy - SP10, point 2 of the Borough's Core Strategy <p><i>Protect and enhance the following heritage assets and their settings:</i> (...)</p>

Conservation Areas

(...)

Other buildings and areas that are identified through the Conservation Area Character Appraisals and Management Guidelines

- *SP12 (b) of the Borough's Core Strategy
Improve, enhance and develop a network of sustainable, connected, well-designed places across the borough through:
(...)
b) Retaining and respecting the features that contribute to each places' heritage, character and local distinctiveness.*
- *Policy DM27 Heritage and the Historic Environment of the Managing Development Document, in particular paragraph 1: Development will be required to protect and enhance the borough's heritage assets, their setting and their significance as key elements of developing the sense of place of the borough's distinctive 'Places'
and point 27.7 supporting DM27 which clarifies that the Council would not allow additional roof storeys
(...) where they would harm the significance, specifically the appearance and character, of terraces or groups of buildings where the existing roof line is of predominantly uniform character (...).*

The proposal would also compromise on addressing the following goals of the Conservation Strategy:

- Strategy Goal 1: Understanding the significance of the heritage;
- Strategy Goal 2: Increasing community pride, ownership and involvement in heritage to promote community cohesion
- Strategy Goal 6: Ensuring Effective Protection of the Heritage

The policy on mansard roofs being considered would (if adopted) accept the potential harm to the special character of Driffield and Medway conservation areas. Albeit the following potential public benefits were identified which could offset harm to heritage significance to some degree:

1. Support social cohesion by enabling families to grow into their homes and not have to move. This has potential to lead to a

			<p>less transient population, and help people in creating local ties and therefore strengthen community cohesion. However, given the profiling of the types of properties and the number of properties which are owner occupied, there is uncertainty how far these benefits will extend and the resulting social cohesion should not be overstated as a benefit. There is also no guarantee that allowing mansards will lead to those who take advantage of the policy staying in their property long term. The policies have the potential to lead to larger properties within the conservation area, however it must be noted that the changes could also lead to more applications to subdivide properties within the two conservation areas.</p> <p>Social cohesion lies in the heart of the Borough's development framework. <i>The One Tower Hamlets vision is to reduce inequality, promote community cohesion and enable community engagement and leadership by giving people the tools and support to improve their lives.</i></p> <p>2. If a packaged approach was adopted, lead to façade improvements which will itself lead to the improvements in the appearance of the conservation areas. <i>Conservation Strategy Goal Strategy Goal 3: Ensuring effective governance and management of the heritage</i> <i>Conservation Strategy Strategy Goal 5: Improving the condition of the heritage</i></p> <p>3. Create/support jobs through the construction of the mansards. Core Strategy SP06 (1c) 1. <i>Seek to maximise and deliver investment and job creation in the borough, by:</i> (...) c) <i>Ensuring job opportunities are provided in each place in, and at the edge of, town centres.</i></p> <p>In respect of (2) above some public benefits could be secured if a package approach was taken in order to secure (a) works to address issues arising in respect of the dwelling concerned (and its current contribution to the character & appearance of the CA concerned) and (b) some limited off-site contribution which allowed for monitoring of the conservation area and other general</p>
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			<p>improvements. Therefore whilst the development of mansards in isolation would be harmful to the character of the conservation areas for some considerable time the requirements in respect of (a) & (b) above would, at least, mitigate that harm to some degree.</p> <p>All properties suitable for a mansard roof extension would enjoy unconditional private benefit of a price uplift as a result of a more flexible attitude by the Local Planning Authority to the addition of mansard roofs in these areas (this would be regardless of any protected characteristics). There is potential that there could be additional positive benefits which could flow to those with protected characteristics:</p> <ol style="list-style-type: none">1. The potential for those with disabilities or in their later life to make further adaptations to their homes that might not be possible with a smaller dwellings and potentially more room for a live in carer if this was required.2. Potential for those of some races, religions or beliefs who are more inclined to have larger families or live with extended families to be able to stay in their properties longer by extending their homes. <p>These benefits would not extend to those within other conservation areas. It is clear that any positive/negative impact on equalities would be indirect and an unintended consequence of the policy. It should be noted that there is no bar on those with protected characteristics in other conservation areas applying for planning permission for mansard roofs and if applicable the Council would be required to take on board any equality impacts in taking the individual decision. They would, however, not be in the same policy position as those within the conservation areas where the policy was more permissive, and a decision would need to be taken on a case by case basis which would include an individual assessment of the impact of the development on the appearance of the conservation area.</p>
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b	<p>Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)?</p> <p>Is there information about the equality profile of those affected?</p>	<p>YES</p> <p>NO</p>	<p>The potential implications of the policy are clear both in respect of the revised character appraisals and guidelines and the flexible approach to mansard roofs. The application of the policy is dependent upon the built fabric, and historic environment rather than upon the characteristics of the community who live within it.</p> <p>Under the Equality Act 2010 the protected characteristics are: age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or beliefs, and sexual orientation.</p> <p>No accurate equality profiling of those that might be affected has been possible because the conservation areas cross the ward boundaries for which census data is available. As part of the consultation process the Council sent equality monitoring forms to those consulted to request information to assist in obtaining the necessary data (and this was also on line), however, none of these monitoring forms were returned.</p>
2 Monitoring / Collecting Evidence / Data and Consultation			
a	<p>Is there reliable qualitative and quantitative data to support claims made about impacts?</p>	<p>NO-quantitative data</p> <p>YES-qualitative data</p>	<p>As above – there is a lack of profiling or information received in response to the consultation on the exact ways/the extent to which the refusal or approval of a more permissive approach to mansards could impact on those with protected characteristics. Because of the nature of the policy it is clear however, that a more permissive approach may bring benefits to those within the conservation areas concerned which wouldn't be secured if the status quo remains. These have been addressed above.</p> <p>The documents to which may be adopted apply specifically to 2 Conservation Areas: Medway and Driffield. They include:</p> <ol style="list-style-type: none"> 1. Revised Character Appraisal and Management Plan for Driffield Road Conservation area 2. Revised Character Appraisals and Management Plan for Medway Conservation Area.

			<p>The report to Cabinet is supported by:-</p> <ul style="list-style-type: none"> • Summary of Consultation Responses • Methodology for Assessing Harm • Assessment Report - Harm v Public Benefit • Property type and tenure- Driffield Road and Medway <p>They are based on:</p> <ul style="list-style-type: none"> - a survey of the existing fabric with regard to the existing form of roofs and rear extensions; - design work developing options for new extensions with minimum impact on the special character; - an assessment of harm to heritage assets; - an desk top study of public benefits generated by the policy - a series of public consultations conducted by officers.
b	Is there sufficient evidence of local/regional/national research that can inform the analysis?	NO	<p>So far as assessing any impact on the protected characteristics (as set out above) it has been difficult to obtain accurate profiling to inform the analysis. The same is true of any regional or national research. The Council are not aware of any other research or monitoring that has been carried out regionally or nationally in respect of the positive or negative impacts on equalities linked with a permissive approach to mansards.</p> <p>National policy supports the appraisal of conservation areas and the protection and enhancement of their special character and appearance. The London Plan, and the Tower Hamlets Local Plan identify the protection of the historic environment as a goal. The Borough's Conservation Strategy helps to make Tower Hamlets a great place to live, by managing and sustaining the heritage, and thereby reinforcing the distinctive identity and unique sense of place of the Borough.</p>
c	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	YES	<p>The proposals were constructed by conservation officers with expertise in the assessment of the historic environment; supported by external experts specialising in architectural design in a heritage context. Officers sought responses on the equality profile of those responding to consultation, however no responses were received. Policy officers did contact the team who hold the</p>



			census data for the wards, however following discussions it was felt that because the conservation areas crossed ward boundaries and were only parts of wards, any profiling based on wards would not be an accurate basis on which to carry out the analysis.
d	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	YES	<p>Detailed information about the proposal was published on Council's website with clear instructions about the ways feedback could be provided. As identified equality profiling information was sought.</p> <p>Letters were sent to all households within the identified conservation areas and to key stakeholders alerting them to the proposals setting out where more information could be found, officers could be contacted and meetings attended.</p> <p>Three meetings were held in the afternoons and evenings at accessible venues. Information about the proposals and where to find additional information was also advertised in the paper and on the Councils website.</p>
3	Assessing Impact and Analysis		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	NO	<p>The general policy is directed toward the protection of the built fabric and is dependent upon the quality of the townscape, rather than upon the characteristics of the community who live within it. However in respect of a flexible approach to mansard roofs, public benefits generated favour needs of families: couples, children, elderly, including disabled.</p> <p>As above, there is a lack of evidence as to how extensive any impact might be (in terms of the number of people with a protected characteristic which might benefit from the policy), however if a permissive approach is taken it is expected that the impact of the policy would be an indirect positive one for the people that live within the two conservation areas concerned, which has been addressed above.</p>
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	YES	The potential positive benefits to those with protected characteristics within the two conservation areas directly concerned have been set out above. The proposals are applied according to the character of the built environment, not the

			characteristics of residents; albeit the policy may unintentionally discriminate residents of the other conservation areas in the Borough, including nine protected characteristics. Potential benefits generated from roof extensions in conservation areas other than Driffield and Medway would be considered as of less value when compared against their potential harm to heritage assets without conducting further area specific assessments, thus residents of other conservation areas are disadvantaged, including those within protected characteristics (who might benefit to a greater degree or for different reasons than the general public).
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	YES	The decision to undertake further detailed design guidance to explore further opportunities for mansard roof extensions for family homes in Driffield Road and Medway Conservation Areas was agreed by Cabinet on the 26 July 2016. It is not considered that any mitigation or improvement action plan is necessary in respect of the changes to policy currently being considered. Any impact on equalities would be positive and indirect.
b	Have alternative options been explored	YES	The option to take no action – No change to existing Appraisals – was considered. It was not recommended as the proposed recommendations are strategic, measurable and attainable. Further options exist in terms of approving the revised appraisals outright or in terms of carrying out further work in respect of seeking a package of improvements along with the mansard applications to secure improvements to the appearance of the applicable dwelling within the conservation area, and seeking contributions which would assist in the monitoring of the conservation areas, along with other more general improvements.
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	YES	The implementation of these proposals will be reviewed as part of the review of the Conservation Area Character Appraisals of which they will form a part.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	NO	The Council could set a 5 year monitoring period for the policy implementation in the pilot areas to identify the number and

			quality of extensions constructed; quantify the public benefits generated in due course. As part of this the Council could seek to assess the positive and negative impacts on those with protected characteristics (although it is recognised that obtaining the information on this final aspect could be difficult as there is no obligation on applicants to provide this).
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	YES	

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template	Suspend – Further Work Required	Red 
As a result of performing the QA checklist, the policy, project or	Proceed with	Green: 

function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	implementation	
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Appendix 7

Dwelling Type and Tenure – Driffield Road and Medway Conservation Area

Appendix 7- Dwelling type and Tenure data for Medway and Driffield conservation areas

Dwelling Type

Dwelling type	Medway	Driffield
Detached house	20	6
Semi-detached house	35	23
Terraced (including end-terrace) house	393	276
flat in Purpose-built block of flats or tenement	316	146
flat in Part of a converted or shared house (including bed-sits)	142	115
flat In a commercial building	19	38
Caravan or other mobile or temporary structure	0	6
Total*	925	610

Source : 2011 Census table KS401EW

Tenure

tenure	Medway	Driffield
Owned outright	112	104
Owned with a mortgage or loan	178	164
Shared ownership (part owned and part rented)	19	2
Social rented: Rented from council (Local Authority)	106	40
Social rented: Other	266	107
Private rented: Private landlord or letting agency	204	166
Private rented: Other	13	10
Living rent free	14	5
Total*	912	598

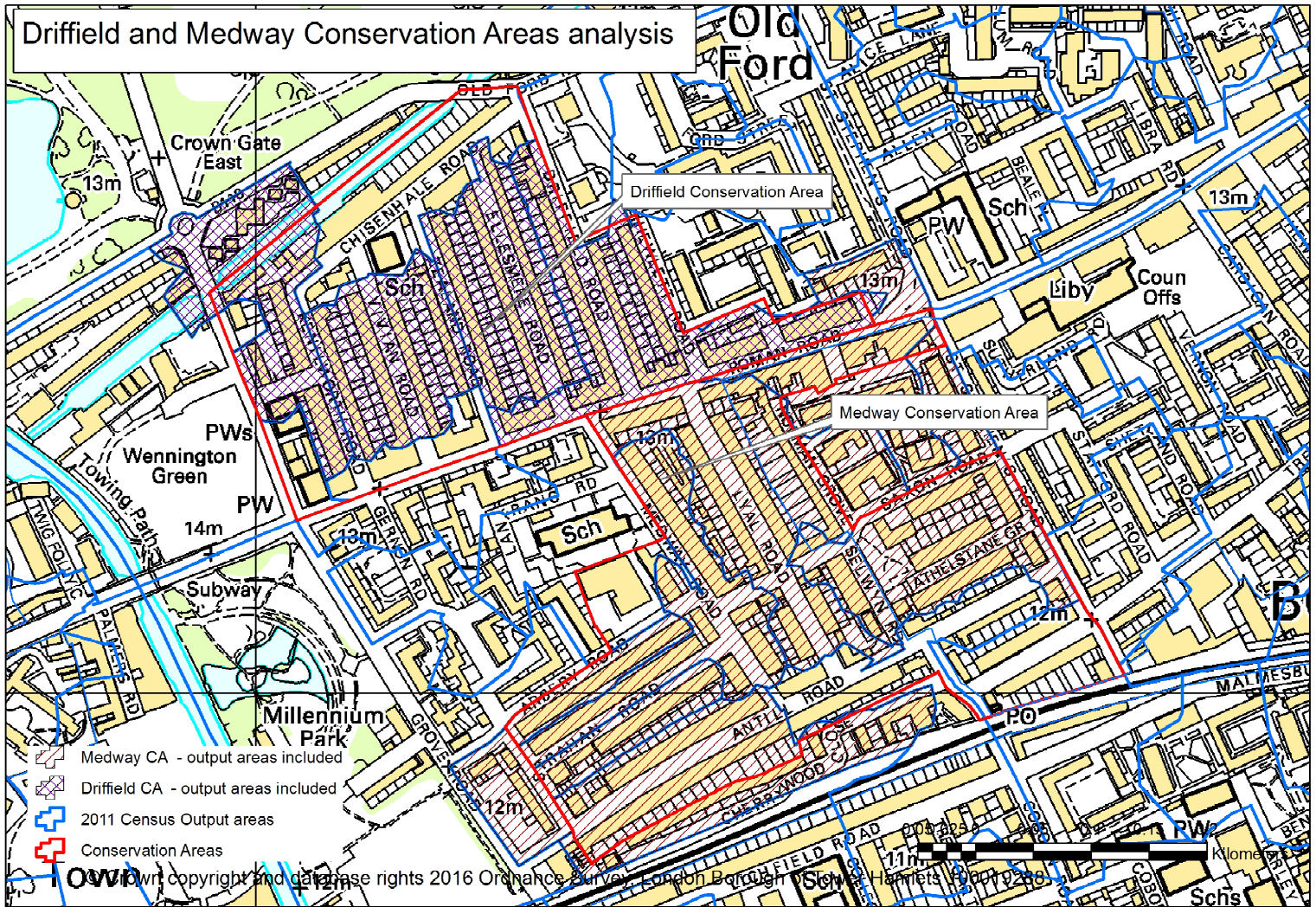
Source: 2011 Census table KS402EW

*Please note that the totals for both tables are not the same as the Tables have slightly different base units

Tenure = households

Dwelling type = household spaces and dwellings

Driffield and Medway Conservation Areas analysis



- Medway CA - output areas included
- Driffield CA - output areas included
- 2011 Census Output areas
- Conservation Areas

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1 Kilometre