

APPENDIX 1B:

CABINET REPORT (6 DECEMBER 2016)

Cabinet 6 th December 2016	 TOWER HAMLETS
Report of: Aman Dalvi, Corporate Director, Development and Renewal	Classification: [Unrestricted]
Revised Character Appraisals and Management Guidelines for Driffield Road and Medway Conservation Area	

Lead Member	Mayor
Originating Officer(s)	Sripriya Sudhakar, Team Leader- Place Shaping Team
Wards affected	Bow East
Key Decision?	Yes
Community Plan Theme	A Great Place to Live

Executive Summary

This report follows from the Overview and Scrutiny Challenge Session on *Planning in Conservation Areas: The implications of Conservation Areas on the extension of family homes* which went to Overview and Scrutiny Committee (OSC) in January 2015. Six recommendations were identified and agreed by the Cabinet on the 8th April 2015. This report presents progress made with regard to recommendation 3 which was to individually refresh the Conservation Area Character Appraisal and Management Plans for eight Conservation Areas with family dwelling houses where householders submit the most planning applications.

Of the eight areas, Addendums for Chapel House, Fairfield Road, Jesus Hospital, Tredegar Square, Victoria Park and York Square Conservation Areas were adopted by Cabinet on 26th July 2016. Officers were subsequently asked to consider as part of this process the possibility of the Council taking a more flexible approach to roof extensions within the other two areas – Driffield Road and Medway Conservation Areas. This report relates to the further detailed review of and guidance for the Driffield Road and Medway Conservation Areas, in the form of revised Character Appraisals and Management Plans.

A detailed assessment of the impact of a more flexible approach to mansard roofs upon the character and appearance of the two Conservation Areas and the potential public benefits associated with such works, as required by the National Planning Policy Framework (NPPF) has been prepared alongside the refreshed appraisals and management plans for the two conservation areas to assess the suitability of the proposals. The Assessment Report (Appendix 5) highlights the significant harmful impact of the proposals on the two Conservation Areas in the short and medium term and concludes that the public benefits associated with the proposals may be given only limited weight and they do not outweigh the harm identified.

Officers' recommendation is that the Council does not pursue a permissive approach

to mansard roof extensions in the two conservation areas because of the resulting harm but that the Council should adopt the Conservation Area Appraisals and Management Guidelines with the detailed design guidance prepared in respect of the mansard roof extensions removed.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note that:
 - The Assessment Report highlights significant harm arising out of the proposals in respect of mansard roofs in the short and medium term and potentially in the long term.
 - Officers' recommendation is to not proceed with these proposals based on the findings from the Assessment Report.
2. Support officers' recommendation to not proceed with the proposals in respect of mansard roofs due to the harmful impact on the character and appearance of the Conservation Areas.
3. Agree that:
 - the detailed design guidance prepared in respect of the mansard roof extensions be removed from the Revised Character Appraisal and Management Guidelines attached as Appendix 2;
 - the Revised Character Appraisals and Management Guidelines for Driffield Road and Medway Conservation Areas (attached as Appendix 2) be adopted without the mansard roof guidance; and
 - the revised Character Appraisals and Management Guidelines will replace the existing Character Appraisals and Management Guidelines for Driffield Road and Medway Conservation Areas.

1. REASONS FOR THE DECISIONS

- 1.1 This report follows from the Overview and Scrutiny Challenge Session on *Planning in Conservation Areas: The implications of Conservation Areas on the extension of family homes* which went to Overview and Scrutiny Committee (OSC) in January 2015. The Challenge session identified six recommendations that were agreed by the Overview and Scrutiny Committee (OSC) and Cabinet (The Action Plan setting out the various recommendation is set out in **Appendix 1**).
- 1.2 **Recommendation 3** was to individually refresh the Conservation Area Character Appraisal and Management Documents for the eight Conservation Areas with a predominantly residential character where householders submit the most planning applications, and pressure to provide increased family accommodation is greatest. The eight areas concerned were Chapel House, Driffield Road, Fairfield Road, Jesus Hospital Estate, Medway, Tredegar

Square, Victoria Park and York Square Conservation Areas. The actions required included:

- Appraising properties within each Conservation Area and categorising them according to their suitability for extensions;
- Identifying criteria where it would be possible to build additional roof storeys and back extensions and possible restrictions;
- Detailed technical notes for repairs and restoration work and for extensions, backed up by photo visuals to avoid ambiguity.

- 1.3 Of the eight areas, Addendums for Chapel House, Fairfield Road, Jesus Hospital, Tredegar Square, Victoria Park and York Square Conservation Areas were adopted by the Mayor in Cabinet on 26th July 2016. The proposals in the Addendums, recommended by officers, identified locations for roof extensions without causing harm to the Conservation Areas. As part of the adoption process officers were asked to consider the possibility of the Council taking an even more flexible approach to roof extensions within the other two areas - Driffield Road and Medway Conservation Areas.
- 1.4 Heritage and design consultants were appointed to explore further opportunities for roof extensions in Driffield Road and Medway Conservation Areas, looking at the most sympathetic form that a roof extension might take. A review of existing Character Appraisal and Management Guidelines for the two Conservation Areas were carried out by the project team. The revised Character Appraisals acknowledge the key positive characteristics, while maintaining the overall structure of the report. The report identifies threats, pressures and opportunities for the Conservation Areas. The revised Management Guidelines provide more guidance on how to implement the opportunities for enhancement and manage development. The Management Guidelines considers how to manage change in the Conservation Area in the short, medium, and long term. It also includes draft prototype designs for mansard roof extensions in the Conservation Areas. For continuity and ease, the Management Guidelines is integrated into the same document as the Character Appraisal for each Conservation Area. The proposals were subject to an inclusive public consultation between 25th July – 11th Sept 2016. Officers reviewed all the consultation responses and prepared a detailed assessment of the significance of the impact of a more flexible approach to mansard roofs upon the character and appearance of the two Conservation Areas and the potential public benefits associated with such works in the Assessment Report (Appendix 5).
- 1.5 The Assessment Report highlights the significant and potentially harmful impact of the proposals on the Driffield Road and Medway Conservation Areas in the short and medium term and long term and concludes that the public benefits associated with the proposals may be given only limited weight and do not outweigh the harm identified, particularly in the short to medium term.
- 1.6 In order to inform the decision making process, officers have sought legal advice from Counsel about the lawfulness of taking such a permissive approach whilst acknowledging the potentially harmful impact on the two

Conservation Areas in the short and medium term. Counsel advice acknowledges officers' recommendation to not progress with a permissive approach to mansard roof extensions in the absence of significant public benefits associated with the proposals to mitigate harm to the two conservation areas. A summary of this feedback is set out in the body of this report and also in Section 2.

- 1.7 This report sets out officers' recommendation to not proceed with the proposals due to their impact on the character and appearance of the two Conservation Areas.

2. ALTERNATIVE OPTIONS

- 2.1 As set out in the body of this report and detailed in the Assessment Report (Appendix 5), a more permissive approach to mansard roof extensions will cause harm to the character and appearance of the Driffield Road and Medway Conservation Areas. Public benefits associated with such a permissive approach are largely personal and not public and this is identified in the Counsel advice. Officers' recommendation is to not pursue a more permissive approach to mansard roof extensions as this will compromise the Council's statutory duty to preserve and enhance the character and appearance of the two Conservation Areas. If the Mayor agrees with the officer recommendation and decides not to take forward the proposals having regard to the significant and harmful impacts on the two Conservation Areas, then the proposals as prepared will be withdrawn and the detailed design guidance prepared for the mansard roof extensions will be removed from the Character Appraisal and Management Plan document. The revised appraisals without the mansard roof guidelines are still recommended for adoption. Roof extensions will then be determined on a case by case basis based on existing local plan policies.

- 2.2 Should the Mayor and Members decide to pursue a more permissive approach to mansard roof extensions in these two areas, officers have identified options for consideration. The options set out below have been informed by independent Counsel advice. Officers have also taken legal advice from the Council's Legal Team in formulating these options.

Option 1 –'Packaged Approach': Increasing the level of quantifiable public benefit to help mitigate harm

- 2.3 One option available for taking a more permissive approach is to mitigate the level of harm identified in this report and in the Assessment Report (Appendix 5). To help mitigate the level of harm to the Driffield Road and Medway Conservation Areas, the level of public benefit secured through a permissive approach to mansard roof extensions would need to be increased substantially. One way in which this might be achieved is to introduce a package of measures to secure such benefits as part of a planning application for mansard roof extensions. This approach is referred to as a '*packaged approach*' to mansard roof extensions in the two Conservation Areas.

- 2.4 It is proposed that such a *packaged approach* to mansard roof extensions would comprise of a planning application for mansard roof extensions which includes other improvements to the appearance of the dwelling, along with other contributions to mitigate the harm identified in the Assessment Report secured through the planning application and through an accompanying legal agreement. Together this would include:
- *Enhancement works*: Works to address issues arising in respect of the dwellings concerned including reinstating cornices, redoing brick work, reinstalling timber sash windows etc. Works will be specific to the property / application site.
 - *Limited off-site contributions*: This would include financial contributions for improving the character and appearance of the relevant conservation area within which the application site is situated and to contribute to monitoring of the conservation area.
- 2.5 The revised Character Appraisals and Management Guidelines for the Driffield Road and Medway Conservation Areas (Appendix 2) identify opportunities for enhancement within the two areas and these include - works to enhance the facade brick work, the repair and reinstatement of railings, the restoration of cornices and works to improve the public realm. A packaged approach will focus on guidance supporting the approval and development of mansards as part of a package with (a) works to address issues arising in respect of the dwelling concerned (and its current contribution to the character and appearance of the conservation area concerned) and (b) some limited off-site contributions. Such an approach would allow the Council to mitigate harm to some degree. Enhancement works would thus be expected to form part of the planning application. For example, an application for a mansard roof may include reinstatement of the parapet cornice.
- 2.6 In terms of the off-site contribution, financial contributions may be secured through a legal agreement proportionate to the increased floor area of the planning application towards public realm enhancement in the conservation area. This for example could contribute towards improving the streetscape, street lighting etc.
- 2.7 In order for the 'packaged approach' to be effective, the mechanism for securing such enhancement works and off-site contributions needs to be secured in advance of applications for mansard roof extensions coming forward in the Driffield Road and Medway Conservation Areas. The 'packaged approach' did not form part of the original consultation when the proposals were presented to residents in summer 2016 and therefore further work would need to be undertaken to establish the mechanism and process for implementing a 'packaged approach'. This should be subject to re-consultation with residents.
- 2.8 The 'packaged approach' raises financial implications, along with other considerations for applicants. It is considered important that the implications are clearly identified, and the public are consulted in advance of such

proposals coming into force in order to hear their views and to ensure that the Council is not subject to any future challenge. Officers therefore recommend a 6 week consultation period to be undertaken. Public consultation will focus on the proposed 'packaged approach' to seek feedback on the proposed approach to mitigate a degree of harm through the necessary 'enhancement works' and 'financial obligations'.

- 2.9 The consultation will also provide an opportunity to identify how to streamline applications for consideration - for example: how applicants will know what specific 'enhancement works' will need to be identified in the submission; what level of financial contribution will be expected from applicants will be identified and will be set out clearly such as £ per sqm. This is important for transparency and clarity for everyone involved.
- 2.10 The consultation will also provide an opportunity for local people in the Driffield Road and Medway Conservation Areas to identify priority public realm projects in their area towards which contributions could be secured and a timescale for their implementation and monitoring can be agreed.
- 2.11 Sections 2.1 - 2.10 above are essential in establishing how public benefits in the area can be augmented and how they can serve as a useful tool when assessing planning applications for roof extensions in the two Conservation Areas. It is important to note that should an application for a mansard roof be submitted in the absence of the above mentioned packaged approach (i.e. prior to the Council carrying out further work and adopting guidance on this) the application will be assessed on a case by case basis against existing local plan policies.
- 2.12 Officers would like to bring to Members' attention the timescales for adopting such a 'packaged approach' to mansard roof extensions. It is important to note that there are two options for progressing such a packaged approach. These are set out in detail in Appendix 9.
- Option 1a is an **integrated approach** that involves further work to establish a mechanism to secure a package of contributions and undertaking public consultation with a view to taking a decision whether or not to adopt in June 2017. In this approach, the principle of mansard roof extensions in Driffield Road and Medway Conservation Areas could be considered and a decision taken whether to adopt the revised documents alongside the relevant measures for mitigating harm as one single 'package' by Cabinet in June 2017.
 - Option 1b is a **two-pronged approach** that involves approving the principle of mansard roof extensions at the 6th December 2016 Cabinet whilst acknowledging the need to undertake further work to establish the mechanism for securing additional public benefits and the adoption of a package of measures by Cabinet in July 2017 if they are deemed acceptable at that time. In this approach, principle of mansard roof extension will be agreed at December Cabinet. Additional work will involve establishing a mechanism to secure a package of contributions

and undertaking public consultation and adoption in July 2017. It is important to note that until mitigation measures are adopted, applications for mansard roof extension will be determined on the basis of existing planning policy.

- 2.13 It should be noted that whilst this approach will help to mitigate the level of harm to the Driffield Road and Medway Conservation Areas to some degree, harm will still result under this approach.

Option 2 – Accept Harm

- 2.14 This option involves Cabinet considering officers' advice and reaching a conclusion about the level of harm that they have assessed would be suffered as a result of a decision to take a more permissive approach, and, subject to the below, accepting this level of harm because they believe there will be significant public benefits. In taking a decision to accept harm to the Driffield Road and Medway Conservation Areas members are entitled to consider the public benefits that would be secured, however, in the determination of applications for development in Conservation Areas or in the exercise of any functions under the planning Acts (including in taking decisions in relation to conservation areas), statute specifically requires the Council to pay special attention to '*the desirability of preserving or enhancing the character or appearance of that area*'. As a statutory obligation this requirement to preserve or enhance the character or appearance of the conservation areas must be given considerable importance and weight when balancing the harm against any public benefits, and it is not enough to simply ask whether the benefits of the policy outweigh the harm. Providing members have paid special attention to the desirability of avoiding that harm and have acted lawfully in all other respects (see the Legal Comments in Section 5 of this report), Cabinet are entitled as a matter of law to take decisions that would result in harm in this context.
- 2.15 It is considered that the content of this report and accompanying appendices details how the Council has paid special attention to this consideration and has acted lawfully.
- 2.16 This approach is not recommended by officers for reasons set out in Section 3 paragraphs 3.30 to 3.55.

3. DETAILS OF REPORT

Overview and Scrutiny Challenge Session Nov 2014

- 3.1 In November 2014 an Overview and Scrutiny Challenge Session was held to address a concern amongst some residents, that the planning constraints in conservation areas were adversely affecting the ability of homeowners to remain in the Borough as their families grow. The perception from residents was that additional planning controls over extending properties within conservation areas were too restrictive. This issue was of particular concern to residents living within the Driffield Road and Medway Conservation Areas, but it was felt to be appropriate to look at those conservation areas which

were predominantly residential in character and which received large numbers of householder planning applications.

- 3.2 The Challenge Session looked to explore what changes to planning policy, practice or procedures could be made to address these concerns whilst still protecting the special character of these conservation areas.
- 3.3 Following the session a report was prepared outlining an action plan, identifying six recommendations, that was agreed by OSC and by the Cabinet on the 8th April 2015 (Appendix 1).

Actions arising from the Overview and Scrutiny Challenge Session

- 3.4 Following the adoption of the Action Plan in April 2015, officers analysed the eight Conservation Areas where householders submit the most planning applications to identify locations suitable for roof and rear extensions. They also undertook a review of Conservation Area Character Appraisals and how extensions were handled in other local authorities in Central London Boroughs.
- 3.5 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that with respect to any buildings or other land in a Conservation Area, in taking decisions on planning applications the decision maker must pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Case law suggests that whilst an assessment of the degree of harm is a matter for planning judgment, once a decision maker considering a proposal finds that it would result in harm to a Conservation Area it must give considerable weight to the desirability of avoiding that harm, and it is not enough to ask whether the benefits of a development outweigh the harm.
- 3.6 Officers carried out an extensive review of the eight Conservation Areas, including a detailed analysis of all properties and their appropriateness for roof and rear extensions as set out in Recommendation 3 of the action plan. This enabled the identification of a set of criteria for roof and rear extensions that would enable family home extensions whilst ensuring that the proposals would be in keeping with the Council's statutory duty to preserve and enhance the character and appearance of the Conservation Area.
- 3.7 Officers prepared draft guidance covering extensions to the roof and to the rear of residential properties, in the form of an addendum to the existing guidance for eight of its conservation areas- Chapel House, Driffield Road, Fairfield Road, Jesus Hospital Estate, Medway, Tredegar Square, Victoria Park, and York Square conservation areas.
- 3.8 The resulting Addendums provided more flexibility for rear extensions than for roof extensions to balance the possible impacts on the conservation areas whilst allowing more flexibility for family home extensions. Supporting this guidance the Council also prepared a draft guidance note for mansard roof extensions in conservation areas, setting out elements of good practice.

First Round of Public Consultation–23rd Nov 2015- 18th Jan 2016 – Addendums without causing harm

- 3.9 The Addendums and Mansard Roof Guidance Note documents were the subject of a consultation between the 23 November 2015 and the 18 January 2016. During this period six public consultation sessions were held that provided an opportunity for local residents and stakeholders to discuss the proposals with officers and provide feedback.
- 3.10 The proposals tabled for public consultation did not cause harm to the character and appearance of the conservation areas as the locations identified for roof and rear extensions were carefully chosen to avoid harm.

Outcome of Public Consultation

- 3.11 Following public consultation, officers reviewed all the consultation responses and presented the findings to the Mayor for his consideration. The Mayor, after carefully considering the consultation feedback and other material considerations set out by officers in various briefing notes, reached the view that officers should:
- Progress with the adoption of the Addendums for the six conservation areas (Chapel House, Fairfield Road, Jesus Hospital, Tredegar Square, Victoria Park, and York Square Conservation Areas as prepared by officers).
 - Undertake detailed design work to explore further the opportunities for a more permissive approach to mansard roof extensions for family houses in the Driffield Road and Medway Conservation Areas
- 3.12 The Addendums for six conservation areas - Chapel House, Fairfield Road, Jesus Hospital Estate, Tredegar Square, Victoria Park, and York Square conservation areas - were recommended by officers for adoption, as the locations for roof and rear extensions identified in the Addendums did not cause harm to the character and appearance of the conservation areas under consideration. The Addendums balanced the need for family home extension in the six areas whilst maintaining Councils statutory duty to preserve and enhance the character and appearance of the conservation areas.
- 3.13 The Addendums for Chapel House, Fairfield Road, Jesus Hospital Estate, Tredegar Square, Victoria Park, and York Square conservation areas were adopted by the Cabinet on 26th July 2016. The Cabinet Report relating to the adoption of the six Addendums and the recommendation to undertake further detailed design work for Driffield Road and Medway Conservation Areas can be viewed on the Council's website can be viewed on the Council's website. http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Development-control/Conservation-areas/Cabinet_Addendums_to_six_Conservation_Areas.pdf
- 3.14 As part of that Cabinet adoption process, it was noted that further research would be undertaken to fully explore the potential for extensions for family homes in Driffield Road and Medway Conservation areas, with a particular focus on the possibility of roof extensions.

Detailed Design Guidance - Driffield Road and Medway – a more permissive approach to mansard roof extensions

- 3.15 A design brief was prepared and tenders were invited from heritage and architectural consultants to undertake further detailed design guidance to explore opportunities for mansard roof extensions in Driffield Road and Medway Conservation Areas. Kennedy O’Callaghan Architects and Alan Baxter Associates successfully tendered for the project and were appointed in May 2016.
- 3.16 Officers worked with the consultants to revise the existing character appraisals and management guidelines for Driffield Road and Medway Conservation Areas. This has drawn on officer’s knowledge of the Conservation Areas and Alan Baxter’s experience of assessing conservation areas and producing character appraisals and audits. Kennedy O’Callaghan have considerable practical experience in conservation projects, undertaking alterations and repairs to listed buildings and buildings in Conservation Areas and provided valuable technical design advice. The consultants brief was to explore a more permissive approach to mansard roof extensions.
- 3.17 The project team established what positively contributed to the character and appearance of the Conservation Areas, and also what detracts from their character and appearance. Historical research was carried out and historic maps were analysed for the two Areas. A review of existing appraisal documents was carried out and they were revised to more clearly acknowledge the key positive characteristics, while maintaining its overall structure. The appraisal identifies threats, pressures and opportunities for the Conservation Areas (Appendix 2).
- 3.18 Having identified the pressures and opportunities in the Character Appraisal, the Management Guidelines provides more guidance on how to implement the opportunities for enhancement and manage development. The revised appraisals consider how to manage change in Driffield Road and Medway Conservation Areas in the short, medium, and long term. They also include draft prototype designs for mansard roof extensions carefully designed to be as sympathetic as possible within the Conservation Areas. For continuity and ease, the Management Guidelines are integrated into the same document as the Character Appraisal for each Conservation Area (Appendix 2).
- 3.19 The proposals included refreshing the existing character appraisals and management guidelines for the two areas and developing detailed design principles for mansard roof extensions, together with a prototype for a mansard roof (Appendix 2).
- 3.20 Officers consulted amenity societies (Historic England, the Victorian Society, the Georgian Group, the Ancient Monuments Society and the Society for the Protection of Ancient Buildings) and sought their feedback on the approach taken, the methodology and the detailed design proposals.

Second Round of Public Consultation – 25th Jul – 11th Sept 2016- Driffield Road and Medway Conservation Areas- a more permissive approach to mansard roof extensions

3.21 The proposals for Driffield Road and Medway Conservation Areas were the subject of an inclusive public consultation between 25th July and 11th Sept 2016. The proposals were published on the Council’s website for residents’ feedback. During this period three public consultation events were also held in Bow and details of these sessions are set out below. At these sessions officers and consultants presented the proposals to residents and stakeholders and addressed queries and noted comments.

Venue	Session Date and time
Bow Idea Store, 1 Gladstone Place Roman Road, Bow E3 5ES	Thursday 28 July 2016 5:30-8:30pm
St. Paul’s Church, St. Stephens Road, E3 5JL	Tuesday 16 August 2016 2-5pm Wednesday 7 September 2016 5:30-8:30pm

3.22 Officers set out clearly in the information presented and in any communication with the residents and stakeholders that further work remained to be undertaken to assess the impacts of the proposals on the character and appearance of the two conservation areas, level of public benefits realised by the proposals, fairness and equality issues arising from the proposals and any other material planning consideration.

Consultation Feedback

3.23 Comments received during consultation showed support for the proposals and the breakdown of the responses received as part of consultation is set out below.

SUMMARY OF CONSULTATION RESPONSES						
	Support		Object		Total	Total number of addresses in the conservation area
	No.	%	No.	%		
Driffield Road	25	69	11	31	36	813
Medway	17	89	2	11	19	937
Total	42	76	13	24	55	1750

- 3.24 A detailed summary of responses received is attached (Appendix 3). It is evident from the feedback, including two signed petitions, received earlier this year (Appendix 8) that there is support for the proposals from residents in the two Conservation Areas.
- 3.25 As part of the consultation process Historic England, The Victorian Society, The Georgian Group, Society for the Protection of Ancient Buildings and The Ancient Monuments Society were invited to comment on the revised documents. The draft conservation area appraisals and management guidelines were emailed to the above with a covering letter explaining the background for the consultation. In addition to inviting them to comment by email, two workshops/meetings were set up for a group discussion. None of the above were able to attend on the given dates, however, written responses were received from Historic England and the Victorian Society.
- 3.26 Detailed feedback from Historic England is set out in Appendix 3. A summary of the 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.

- 3.27 Detailed feedback from The Victorian Society is set out in Appendix 3. A summary of the main issues raised by The Victorian Society 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.

- 3.28 Registered Providers who own housing stock 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. However, one organisation did note that this may enable them to improve the number/choice of homes they were able to offer (Appendix 3).

Assessment of Harm vs Public Benefit of the Proposals

- 3.29 As set out earlier the proposals have to be carefully assessed in accordance with the NPPF. The NPPF requires that development affecting heritage assets should be assessed and any harm identified balanced against the public benefits of the proposals. Officers prepared a methodology for assessing the impacts of the proposals on the character and appearance of the conservation area that takes into account national, regional and local policies (Appendix 4). The assessment methodology follows closely the methodology followed by Planning Inspectors when assessing planning appeals in conservation areas. The assessment methodology was also assessed independently by Counsel to ensure it was robust and defensible.
- 3.30 Based on the methodology adopted, Alan Baxter Associates carried out an independent assessment of the impact of the proposal on the Driffield Road and Medway Conservation Areas and the level of significance of that impact. This assessment along with other material planning considerations has been compiled together in the form of an Assessment Report that weighed harm vs public benefit of the proposals, in line with the NPPF (Appendix 5).
- 3.31 Virtually all the terraces within the two Conservation Area have London (or Butterfly) roofs. These are an inverted 'V' in form with a central valley and ridges on the party walls between the individual houses of the terrace. These roofs are of low pitch and are concealed from the street (i.e. the front) behind parapets producing a hard, straight edged appearance to the houses and a strong silhouette. This lack of visible roof is an important architectural characteristic. At the rear, the parapet is nearly always omitted and the row of gently pitched gables is clearly evident.
- 3.32 The Character Appraisals and Management Guidelines for the Driffield Road and Medway Conservation Areas identify the continuous parapet line and lack of visible roof line as an important character of the conservation areas. The introduction of mansard roof extensions will cause significant change to the appearance of the conservation area. Even with a well-designed and detailed mansard roof proposal with setback as proposed in the management guidelines within the two conservation areas, there is potential for significant harm to the uninterrupted roof line that is characteristic of the two conservation areas. The potential for numerous piecemeal extensions has the potential for significant harm to the character and appearance of the conservation area resulting in a saw toothed appearance. Furthermore, mansard roof extensions will mean loss of the historic fabric - roof 'V' shaped butterfly roof.



- 3.33 This issue of piecemeal roof extension in the two conservation areas and their impact is raised as a concern also by Historic England and the Victorian Society. Whilst they welcome the approach taken to prepare detailed design guidelines for mansard roofs, they have concerns about the piecemeal mansard roof extensions that could cause considerable cumulative negative impact on the character and appearance of the two conservation areas. Counsel advice also acknowledges the negative impact of isolated mansard roof extensions in the two Conservation Areas.
- 3.34 The Assessment Report concludes that there will be significant harm to the character and appearance of Driffield Road and Medway Conservation Areas. The report further qualifies this by setting out that the harm will potentially be substantial in the short term (up to 10 years) and medium term (10-20 years) and potentially less than substantial in the long term (over 20 years) when it is

assumed that many of the properties would have undertaken the extension in line with the set design principles, and some degree of uniformity is once more established.

- 3.35 The Assessment Report sets out that the public benefits associated with these proposals are not sufficiently significant to weigh against the harm caused by these proposals which is an essential test for such assessments. The report concludes that the benefits associated with the proposals are primarily personal and are not public benefits. Although residents argue that the proposals are essential for retaining families in the area and therefore assist in community cohesion, and there is some merit in these arguments, these are matters beyond the remit of planning to control and monitor, and are difficult to quantify.
- 3.36 Historic England in their comments have highlighted that *'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'*. *The proposals currently do not result in significant public benefit to outweigh the harm.*
- 3.37 Counsel advice also recognises the potential harm caused by the isolated mansard roof extensions in the absence of significant public benefits to help mitigate harm, and advises that if harm is to be accepted, the Council should do what it can to seek to mitigate the harm through a packaged approach which seeks to secure public benefits so far as possible, as detailed above. A permissive approach to mansard roof extensions will therefore require a different approach to substantially increase the public benefits and outweigh the harm arising from mansard roof development. Such an approach is not part of the proposals currently under consideration. Such an approach will require undertaking additional work to identify and establish a process to secure the additional benefits and have been set out in Section 2 under alternative options. It is important to note that this approach is currently not part of the proposals under consideration and therefore cannot at this time be finalised or adopted to help to outweigh the harm caused by a permissive approach to mansard roof extensions in the two conservation areas.
- 3.38 An assessment of property type and tenure in the two Conservation Areas (Appendix 7) shows that only 34% in Medway and 45% in Driffield Road are owner occupied and the rest are either privately rented or rented through Local Authority or Housing Association/Registered Providers. This raises questions about the actual number of owner occupied properties that will benefit from family home extensions as a result of these proposals.
- 3.39 Whilst there has been significant public interest in family home extensions in the two conservation areas as is evident from the Overview and Scrutiny Challenge session and the response to public consultation, it is important to note that the level of responses received is only a very small percentage of population when compared the number of addresses in the area. For example, only 36 people sent written responses from Driffield Road out of 813 addresses whilst in Medway there were 19 responses from 937 addresses.

Furthermore, only 25 responses were received from Driffield Road out of 813 addresses and 17 responses from Medway out of 937 addresses seeking a permissive approach for mansard roof extensions. This illustrates that the need for mansard roof extension is from a very small section of the residents in the two conservation areas and is not a reflection of the community at large living within the two areas. It is there important that to note that the argument of allowing family home extensions to retain existing families in the two areas may not be a strong as was originally indicated because of the relatively small number of consultation responses that support the changes.

- 3.40 It is equally important to recognise that 11 out of 36 responses from Driffield Road and 2 out of 19 responses from Medway objected to a permissive approach due to the harm this will cause to the character and appearance of the conservation areas. They also argue that the existing housing meets the requirement for families. There is clearly a tension between those who seek a permissive approach to mansard roof extension and those who resist it within the two areas.
- 3.41 The Driffield Road and Medway Conservation Areas are almost wholly characterised by 2-3 storey Victorian terraces and are predominantly residential in character. They are characterised by the homogenous layout of small scale streets, containing uniform terraces and the lively Roman Road and the streetscape of small retail shops. This is an area of particular special architectural and historic interest, illustrated by its rich history, cohesive character and domestic architecture dating from the 19th century. There are no statutory listed buildings within the two Conservation Areas. It is the cohesive character of the Area rather than individual buildings which the Conservation Area status seeks to preserve and enhance. That very integrity has the potential to be harmed by piecemeal approach to mansard roof extension should a permissive approach be considered for mansard roof extension in these two areas.
- 3.42 The distribution of tenure across the two Conservation Areas shows that the properties owned by housing associations / registered providers are pepper potted across the area. This presents challenges to co-ordinating mansard roof extensions across the terraces in the short and medium term. Lack of co-ordination of the proposals across the terraces due to differences in tenure would result in considerable harm in the short and medium term as it will result in a saw toothed appearance that will have a negative impact on the consistent roof line that is a significant part of the character of the two Conservation Areas.
- 3.43 Given the level of properties that are privately rented and rented including those through housing association/registered providers, it is also hard to ensure public benefit through community cohesion would be achieved as argued during public consultation by residents as there is no guarantee that existing residents would stay long term even if the mansards were permitted and constructed (in rented family accommodation or in owner occupied properties).

- 3.44 There is also the danger of loss of existing family dwelling houses in the absence of appropriate mechanisms to prevent loss of family homes by subdivision and conversion into flats. The distribution of dwelling types (Appendix 7) in the two areas illustrates that a number of properties have already been subdivided in the two areas (Medway- 15% and Driffield -19%). Whilst Local Plan policies resist the loss of family homes, the Plan does not resist subdivision as long as a family sized unit is retained on the application site. In the past this has enabled subdivision of family dwelling houses in the two Conservation Areas. A recent example of such a subdivision resulted in a six bedroom family home being converted into a 3 bedroom family sized unit on the ground floor and a one bedroom unit on the upper floor (even without a mansard roof extension). A more permissive approach to mansard roof extensions offers the potential of promoting such subdivisions in the future, thereby working against the need for larger family houses which this proposal seeks to address. The permissive approach proposed could potentially result in more family dwelling houses being subdivided and thus changing the nature of family home offer in the two Conservation Areas.
- 3.45 As set out in section above, the existing distribution of tenure and ownership pattern in the Driffield Road and Medway Conservation Areas illustrates that it will indeed be difficult to co-ordinate, monitor and achieve coherence and consistency in roof extensions across a terrace/block in the two conservation areas in the short and medium term making it hard to justify the proposals in the absence of significant public benefits to outweigh the harm to the two conservation areas in the short and medium term. Furthermore, in the absence of an appropriate mechanism to resist the subdivision of family homes and its monitoring over time, the level of public benefits in terms of community cohesion and the resultant social capital associated with the proposals is questionable even in the longer term.
- 3.46 It is important to note that even in the long term, not all of the properties will necessarily have implemented the proposals. If appropriate mechanisms to resist the subdivision of family dwelling houses are not adopted the proposals will impact negatively on the community cohesion that this proposal seeks to address. Overall, this raises concerns about the level of public benefit these proposals may achieve even in the longer term to mitigate against the identified harm arising out of the loss of historic fabric (London Roofs/Butterfly roofs) and consistent roof line.
- 3.47 For the reasons set out in this section, the Assessment Report concludes that the proposals for a permissive approach to mansard roof extension will cause considerable harm to the character and appearance of the conservation areas and the level of public benefit is limited and therefore does not outweigh the harm to the conservation area.

Subdivision of Family Dwelling Houses

- 3.48 As set out above a more permissive approach to mansard roof extensions raises concerns about the potential for subdivision of existing family dwelling houses in the two conservation areas. In the absence of an appropriate mechanism to resist subdivision, a permissive approach could result in

subdivision of family houses into flats that could impact negatively on the existing stock of family dwelling houses. More importantly it would work contrary to the original intent of this work which was to enable family homes to expand and support families to grow and remain in the area.

- 3.49 A review of the Council's Local Plan policies illustrates that the Council's policies resist the loss of existing family homes but do not resist subdivision. Where an application is made to subdivide a family dwelling house as long as the application is able to demonstrate that a family sized unit is retained on site, the application is permitted subject to the scheme meeting other material planning considerations. As such, the Council does not have a policy on subdivision to resist family homes from being converted to flats.
- 3.50 In order to address the issue of subdivision of family dwelling houses officers explored the use of an Article 4 Direction in the two Conservation Areas. An Article 4 direction restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development. Where an article 4 direction is in effect, a planning application may be required for development that would otherwise have been considered to be permitted development. However, the subdivision of a family home to flats already requires planning permission. Therefore introducing an Article 4 is not helpful to prevent subdivision.
- 3.51 Officers are currently exploring other planning mechanisms that may be available to the Council to restrict subdivision, either by introducing new policies through the emerging Local Plan, planning conditions, S106 or other mechanisms.

Threat to Historic Environment

- 3.52 As set out in the earlier sections, isolated mansard roofs and loss of historic butterfly roofs could result in the two Conservation Areas being brought under the Historic England's 'Heritage at Risk Register'. The Council has a duty to protect and enhance the historic environment and by taking a permissive approach to mansard roof extensions there is danger that the two conservation areas could come under the 'Heritage at Risk Register' as a direct consequence of the Council adopting a permissive approach to mansard roof extensions.
- 3.53 Furthermore, un-coordinated mansard roof extensions pose a threat to the continuous designation of the conservation area status for these two areas.

Affordability

- 3.54 Permissive approach to mansard roof extensions could encourage speculative development due to the lack of a policy mechanism to resist subdivision. The permissive approach to extensions for mansards in Driffield Road and Medway Conservation Areas provide an opportunity to add two bedrooms to existing 2 and 3 bedroom properties, increasing them to 4 and 5 bedroom properties. This would significantly increase property values and overall land values in these two areas and as a result make properties unaffordable in the area. Whilst not a material planning consideration,

affordability remains a key issue in the borough highlighted by the Council's Affordability Commission, the Draft Housing Strategy and Draft Local Plan. It is important that the Council by adopting such a permissive approach is aware of the impacts on property prices in Driffield Road and Medway Conservation Area.

- 3.55 Officers are also concerned that as a result of the potential of these changes to indirectly result in significant increases in the property values of these two areas, the Council is likely to come under pressure from property owners who may want to realise the value potential in the Borough's other 56 Conservation Areas.

Equality Analysis Quality Assurance Checklist (EAQA)

- 3.56 Officers undertook an equalities assessment of the revised Character Appraisals and Management Guidelines (including the proposal for a more permissive approach to be taken to mansard roof extensions within the Driffield Road and Medway Conservation Areas) in the form of Equality Analysis Quality Assurance Checklist (Appendix 6). In respect to the revisions that provide more general updates to these documents to allow for better management of the conservation area (which officers are recommending for adoption), the checklist concludes the policy is directed toward the built fabric and will affect the community who live within it irrespective of their characteristics.
- 3.57 In respect of the approach to be taken to mansard roof extensions, the findings of the checklist conclude that there is potential for a more flexible approach to have a positive impact on people living within the two conservation areas. These benefits however would not extend to people with protected characteristics who live within other conservation areas in the borough (who could potentially benefit from such a policy to a greater degree or in different ways than the general public). To this end there is a risk of discrimination against these people (albeit the discrimination would also apply to some degree to those without protected characteristics in other conservation areas as well). As such any discrimination is likely to be an indirect or unintended consequence of the Council carrying forward its wider objective to assist growing families in the two Conservation Areas and the status quo would be retained for those in other areas.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 Cabinet and the Overview and Scrutiny Committee have previously considered reports on the implications of conservation areas on the extension of family homes, with the Mayor in Cabinet on 26th July 2016 approving the adoption of 'Addendums to Conservation Area Character Appraisal and Management Guidelines' for six conservation areas.
- 4.2 Two further conservation areas, Driffield Road and Medway, were considered at the 26th July meeting, and approval was given for further design guidance for these areas to be prepared in conjunction with external heritage and

architectural design consultants. The undertaking of a further consultation process was also approved.

- 4.3 Although Counsel's advice has been used in the drafting of the policy, this does not prevent the risk of a legal challenge to the council's decision, which would take the form of a judicial review in the High Court. If a successful challenge took place, there is a risk of a significant cost liability to the council which should be avoided if possible given the uncertainty of successfully defending the Council's position and the potential costs involved. The potential liability would depend on a variety of factors including how far the appeal went through the courts (following the appeal being heard in the High Court, it could then pass to the Court of Appeal and then could be referred to the Supreme Court).
- 4.4 Estimates of the council's costs for a judicial review that is resolved at the High Court stage exceed £25,000. If the council is unsuccessful it will also be liable for the claimant's costs which could be substantially higher, and it is therefore possible that proceedings determined at this first stage could cost in excess of £100,000. Costs would increase further if the council is unsuccessful and the judicial review progresses beyond the High Court. However, if the council is successful in defending the proceedings, it is likely the appellant would have to reimburse the council's costs.
- 4.5 It would seem that there are significant financial risks associated with a successful legal challenge to adopting a more permissive policy and subsequently approving planning applications in line with that policy, particularly given that the assessment commissioned by the Council and set out in paragraphs 3.29 to 3.47 does not support a more permissive approach.
- 4.6 As was the case with the previous reports, the recommendations are associated with reviewing and updating policies and planning documentation. The resources relating to the preparation of the amendments to the conservation area guidelines and the undertaking of the formal consultation processes have mainly been officer time, the costs of which have been met from within existing budgets. However in this specific case, external heritage and design consultants have been commissioned to undertake detailed design guidance for mansard roof extensions within the Driffield Road and Medway areas, and Counsel's advice has also been sought on the implications if a permissive approach to mansard roof extensions in these two conservation areas is adopted (paragraph 3.64). These costs are estimated at approximately £80,000 and will also be met from existing resources.

5. LEGAL COMMENTS

- 5.1 This report recommends that the Mayor in Cabinet note the harm that could be caused to the conservation areas through the adoption of a more flexible approach to mansard roofs, as outlined in the Assessment Report. As such the report recommends that the Mayor in Cabinet agree officers' recommendation to adopt the revised Conservation Area Appraisals and Management Guidelines, with the detailed design guidance prepared in

respect of the mansard roof extensions removed. For completeness and clarity it is recommended that if the updated appraisals and guidelines are adopted that they replace the existing versions currently in use. If the Mayor in Cabinet is not supportive of the officer recommendation then alternative options for consideration are set out in section 2.

- 5.2 This report follows reports to Cabinet on the 8th of April 2015 and 26 July 2016 which followed an Overview and Scrutiny Challenge Session in respect of planning in conservation areas. The earlier report considered the implications of Conservation Area designation on the extension of family homes and made a number of recommendations for officers to progress further work. Flowing out of the decision in Cabinet on the 26th of July it was agreed that further research would be undertaken to more fully explore the potential for extensions for family homes in the Driffield Road and Medway conservation areas, with a particular focus on roof extensions. Officers are now reporting to Cabinet setting out the results and conclusions of this further assessment and work.
- 5.3 Decisions around changes to the conservation areas should be read and considered in the context of the Council's general statutory duty in respect of conservation areas in the exercise of its powers as the local planning authority (LPA) for the London Borough of Tower Hamlets, as described below.
- 5.4 Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the PLBCAA 1990") provides that it shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. Any proposals under this section are required to be submitted for consideration to a public meeting in the area to which they relate, and the LPA must have regard to any views concerning the proposals expressed by persons attending the meeting.
- 5.5 In the determination of applications for development in Conservation Areas or in the exercise of any functions under the Planning Acts (including in taking decisions in relation to conservation areas), statute specifically requires the Council to pay special attention to '*the desirability of preserving or enhancing the character or appearance of that area*' (section 72(1) of the PLBCAA 1990).
- 5.6 Also, the National Planning Policy Framework (NPPF) requires decisions on planning applications to be made in accordance with local planning policies. This includes decisions made by the Council, in its capacity as the LPA, on planning applications for mansard roof extensions.
- 5.7 This report shows that the Council's officers have considered and assessed the impacts of taking a more flexible approach to roof extensions within the two conservation areas in the form of revised character appraisals and management plans. This report acknowledges that significant harm could arise if a more permissive approach was taken to mansard roof extensions within these conservation areas. In light of this and in taking a decision how to

proceed, in accordance with the duty under s72 of the PLBCAA 1990 the Council must pay special regard '*the desirability of preserving or enhancing the character or appearance of that area*'. As a statutory duty, this should be given considerable importance and weight when balancing the harm against any benefits and special weight should be given to the desirability of avoiding that harm.

5.8 This report explains how the proposed change of approach being considered in this report has been assessed as causing significant harm to the character and appearance of the conservation areas especially in the short to medium term. After considering this report and the supporting documents it is open to the Mayor in Cabinet to reach his own conclusion as to whether the change of approach under consideration should be taken forward. Nonetheless, it should be noted and understood that the Council is at risk of challenge which could be brought by way of judicial review, especially if a decision is taken against officer advice. However, provided the Council comply with their duty under s72, consider all material considerations, and do not have regard to considerations which are not material to this decision (and otherwise act lawfully) then the Council would be in a strong position to defend such a claim.

5.9 In terms of taking a decision on the officer recommendation, the consultation that has been undertaken must have followed the following common law criteria:

- (a) it should be at a time when proposals are still at a formative stage;
- (b) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response;
- (c) adequate time must be given for consideration and response; and
- (d) the product of consultation must be conscientiously taken into account.

Robust and appropriate consultation has been carried out as referred to in paragraphs 3.9 and 3.21 of this report and paragraphs (a) to (c) above have been complied with. Prior to any decision being made, full and proper account of the consultation responses must be taken in deciding whether the Council proceeds with the changes.

5.10 As referenced throughout this report, Counsel's advice has been requested at various stages of the process, firstly to review the methodology that was to be used to assess the impacts of the proposals on the character and appearance of the conservation area and more recently to review the assessment report and supporting documentation. In his advice Counsel acknowledged the harm that isolated mansard development would cause (at least in the medium term) and advised that the Council should therefore seek to mitigate that harm. It was suggested that the Council might seek to do this via the packaged approach which is detailed and discussed above in this report. Such a packaged approach would allow the Council to assess the impact of the mansards alongside potential mitigation, rather than in isolation.

- 5.11 As detailed a packaged approach would be achieved by adopting guidance supporting the approval and development of mansards alongside or as part of a package with (a) works to address issues arising in respect of the dwelling concerned (and its current contribution to the character and appearance of the conservation area concerned), and (b) some limited off-site contributions which would allow for other necessary improvements within the conservation area and monitoring. The guidance could contemplate the routine refusal, rather than grant, of planning permission for mansard roof developments where these were proposed without other improvements.
- 5.12 As the above package approach would represent a significant shift from the proposals the Council consulted on, it is considered that the Council has a duty to carry out further consultation if the Council wishes to take such an approach forward. Without this further consultation, the Council could be vulnerable to challenge and the Council would not be in as favourable position to ask that the guidance be given significant weight in the consideration of an application under appeal. In respect of the two approaches identified under Option 1, option 1a (the integrated approach) is considered the more robust approach because a final decision can be taking having regard to the exact public benefits which could be secured. If the Mayor in Cabinet decides that Option 1 should be pursued then prior to a final decision being taken on the extent and nature of the public benefits, any applications made for mansard roof extensions in the interim would be assessed on a case by case basis against existing local plan policies.
- 5.13 In deciding whether to bring forward the recommendations in this report, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not. An Equality Analysis Quality Assurance Checklist (EAQA) has been carried out, which is discussed above.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 One of Tower Hamlets great strengths is its diversity, however, this diversity can sometimes result in inequality. One Tower Hamlets is about reducing the inequalities and poverty that we see around us, strengthening cohesion and making sure our communities continue to live well together.
- 6.2 A key theme in the Tower Hamlets Community Plan is that of A Great Place to Live. The Community Plan states that: "A Great Place to Live" reflects our aspiration that Tower Hamlets should be a place where people enjoy living, working and studying and take pride in belonging". The preservation and enhancement of areas of special architectural or historic interest may make a significant contribution to the local environment and how people feel about Tower Hamlets. Pride in the local environment may serve to bring communities together across ages and backgrounds.

6.3 Inclusion of a property on the Statutory List or within a Conservation Area can result in additional costs being incurred by occupants and owners, both in terms of the sympathetic repair of buildings and the development of proposals for their alteration or extension. The revised Character Appraisals and Management Guidelines will help to clarify the special character of a Conservation Area particularly with reference to possible extensions and thus help to minimise the costs by providing surety to the development process.

6.4 An Equality Analysis was carried out to consider the public consultation undertaken and to assess the likely impact of the conservation area character appraisals and management guidelines on the Borough's diverse communities. The findings of this are discussed at paragraphs 3.56-3.57.

7. BEST VALUE (BV) IMPLICATIONS

7.1 Work has been carried out by external consultants (Design and heritage) with input from Council officers. Any additional work arising from this decision will be carried out by external consultants through the use of a competitive procurement process.

7.2 Consultation has been carried out with local residents in the two Conservation Areas, along with other key stakeholders. This is detailed in paragraphs 3.21 to 3.28 of this report.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1 There are no specific environmental implications associated with this report.

9. RISK MANAGEMENT IMPLICATIONS

9.1 Progress on the addendums and Mansard Roof Guidance Note has been regularly reported through a number of internal groups that consider risk management and mitigation. These include:

- Directorate Management Team (3rd October 2016)
- Corporate Management Team (26th October 2016)

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

10.1 There are no specific crime and disorder reduction implications associated with this report.

11. SAFEGUARDING IMPLICATIONS

11.1 There are no specific safeguarding implications associated with this report.

Linked Reports, Appendices and Background Documents

Linked Report

NONE

Appendices

- Appendix 1 Cabinet Report and Action Plan (8th April 2015)
- Appendix 2 Revised Character Appraisals and Management Plan for Driffield Road and Medway Conservation Area
- Appendix 3 Summary of Consultation Responses
- Appendix 4 Methodology for Assessing Harm
- Appendix 5 Assessment Report - Harm v Public Benefit
- Appendix 6 An Equality Analysis Quality Assurance Checklist (EAQA)
- Appendix 7 Property type and tenure- Driffield Road and Medway
- Appendix 8 Petitions received in January 2016
- Appendix 9 Timescales to Progress a Permissive Approach to Mansard Roof Extensions in Driffield Road and Medway Conservation Areas – Alternate Options

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

None

Officer contact details for documents:

Sripriya Sudhakar

Team Leader- Place Shaping Team

Sripriya.Sudhakar@towerhamlets.gov.uk

020 7364 5371