

LONDON BOROUGH OF CAMDEN	WARDS: Highgate
REPORT TITLE: Draft Conservation Area Appraisal and Management Strategy and Draft Energy Efficiency Guidance for Holly Lodge Estate Conservation Area (Heritage-Sustainability Pilot Project) (CENV/2012/19)	
REPORT OF: Director of Culture and Environment	
FOR SUBMISSION TO: Cabinet Member, Regeneration and Growth	DATE: 6 December 2012
<p>SUMMARY OF REPORT:</p> <p>This report requests the Cabinet Member to consider the content of the Conservation Area Appraisal and Management Strategy and the Energy Efficiency planning guidance documents appended to this report and agree their adoption. The two draft guidance documents were reported to Cabinet Member on 26 July 2012 and have been redrafted in response to comments received following public consultation.</p> <p>The Conservation Area Appraisal and Management Strategy has been drafted following English Heritage Guidelines and contains elements of an earlier (2002) unadopted draft.</p> <p>The energy efficiency guidance was developed as one of two pilot projects (the other being Dartmouth Park Conservation Area, adopted 23 August 2012) to provide guidance for homeowners in conservation areas on making energy efficiency retrofitting measures. It has been produced so that relevant planning guidance is available to residents and owners following the launch of the government's Green Deal in later 2012.</p> <p>Local Government Act 1972 – Access to Information</p> <p>No documents were used in the preparation of this report which are required to be listed.</p> <p>Contact Officer: Joanna Ecclestone, Conservation and Historic Buildings Advisor Placeshaping Service Culture and Environment Telephone: 0207 974 2078 Email: Joanna.ecclestone@camden.gov.uk</p>	
<p>RECOMMENDATION:</p> <p>That the Cabinet Member, Regeneration and Growth be asked to agree the adoption of the Energy Efficiency Planning Guidance for Holly Lodge as set out in the report</p>	

Signed: 

Date: 27 November 2012

1.0 Conservation Area Appraisal and Management Strategy

- 1.1 Conservation Area Appraisals and Management Strategies (CAAMS) are recognised as being of considerable importance in providing a sound basis for guiding the types of alterations and development that are likely to be acceptable or unacceptable in each area. The documents are for the use of local residents, community groups, businesses, property owners, architects and developers as an aid to the formulation and design of development proposals and change in the area. The documents will also be used by the Council in the assessment of all development proposals.
- 1.2 The Holly Lodge Estate Conservation Area (CA) was designated in 1992. Draft guidelines for development were prepared by the Conservation Area Advisory Committee (CAAC) and incorporated into a draft CA statement by the Council in 2002. However, the statement was never taken out for public consultation or adopted by the Council.
- 1.3 A revised draft was prepared in 2010-11, but public consultation was put on hold during the departmental restructure. It was finalised with significant input from the Holly Lodge Estate Conservation Area Advisory Committee.

2.0 Energy Efficiency Planning Guidance

- 2.1 The guidance has been prepared in response to Camden's own borough-wide carbon reduction target of 40% by 2020 which identifies the retrofitting of existing homes as a significant element. Feasibility work to determine the most effective means of achieving the 40% target suggests that over 30,000 homes in the borough (around a third of the total number of dwellings) need to be retrofitted with low carbon technologies by 2020.
- 2.2 Because a high percentage of building stock in the borough lies within conservation areas (CAs) the appearance of many buildings and historic areas could be harmed if a careful and properly informed approach to retrofitting is not taken.
- 2.3 The Government's Green Deal (launched in late 2012) is considered to be the principal financing mechanism for retrofitting. Some retrofitting measures require planning permission, and the approach to these is set out in Camden's Local Development Framework documents, the London Plan, and the new National Planning Policy Framework (NPPF). These policies require the preservation of the historic environment, whilst balancing this with the need to address climate change.
- 2.4 The guidance for Holly Lodge Estate Conservation Area is one of two pilot projects to consider how the policy tensions described above could be addressed. The other pilot was Dartmouth Park Conservation Area, and the guidance for this was adopted following public consultation on 23 August 2012.

- 2.5 Following the completion of these two pilots the lessons learnt will be assessed with a view to producing borough wide energy efficiency guidance for homes in conservation areas.

3.0 CONSULTATION

- 3.1 A joint consultation exercise was carried out for the two new pieces of draft planning guidance, for a six week period from 10 September 2012 to 21 October 2012. Stakeholders were identified as residents; tenants; residents associations; estate management committee; local amenity groups and community groups identified through Cindex, including Transition Highgate and Highgate Climate Action Network. Statutory consultees were also consulted, as identified in the report agreed by the Cabinet Member for Regeneration and Growth on 6 July 2012.

The consultation methodology had the following broad aims:

- a) to ensure that all information was available in different formats, and to tell people where and how they can get the information in different formats;
- b) to highlight the relevant information and show how it would affect people
- c) to inform stakeholders how they can reply using e-technology.

- 3.2 The following methods of consultation were used:

- (a) Flyers and posters advertising the consultation including a public meeting aimed at stakeholders in the conservation area.
- (b) Letters sent to the addresses of the buildings proposed to be included within the Conservation Area as a result of changing the boundary.
- (c) An advertisement in the local press advertising the consultation
- (d) Electronic copy of draft conservation area appraisal and management strategy placed on the Council's website, with on-line email consultation feedback system set-up to be sent directly to the Planning service group e-mail address.
- e) A public consultation meeting, comprising presentations on both the Conservation Area Appraisal and the Energy Efficiency planning guidance and question and answer sessions, staffed by conservation, sustainability and community liaison officers was held at Holly Lodge Estate Community Centre, Makepeace Avenue, from 6-8.45 on 27 September 2012. 8 local residents attended.

- 3.3 Hard copies of both documents were available at the Culture and Environment Department Reception, Town Hall Extension

- 3.4 Electronic copies of both documents were placed on the website for viewing and/or download. An electronic copy was also available to email on request for stakeholders if required.

- 3.5 At the end of the six-week period, the comments received from the

consultation exercise have been considered and both documents have been revised to take them into account. A summary of the consultation responses and revisions are contained within this report. The adopted Conservation Area Appraisal and Management Strategy and the Energy Efficiency Planning Guidance will then become a material consideration for the Council when it assesses individual planning applications

Consultation responses

Conservation Area Appraisal and Management Strategy

3.6 5 people responded via the online form and one submitted a written response. The content of these responses varied but two predominantly concentrated on the apparent lack of advice provided specifically for the mansion blocks, works carried out as part of the recent refurbishment of Makepeace Mansions, the new cycle/refuse store and the condition of the public areas at the eastern edge of the conservation area; one welcomed the draft guidance but considered that Article 4 would be needed to make it effective, and one focussed on development outside the conservation area boundary.

3.7 The respondents answered the standard questions on the feedback form as follows:

	a) Do you agree with the summary of the special interest and the character analysis of the area?	a) Do you agree with the buildings listed as making a positive contribution to the area?	a) Do you agree with the buildings and features listed as detracting from the character of the area?	Do you agree with the approach to the preservation and enhancement of the CA as described in the management strategy?
1	Yes			Yes
2	Yes			No
3	Yes	Yes	Yes	Yes
4		No	No	No
5	No	No	No	No
6	Yes	Yes	Yes	Yes

3.8 The additional comments and questions also received on the feedback forms responses are set out in the table appended to this report. The guidance document has been amended in light of these comments, wherever appropriate, and the table includes notes of what officers' response was and/or how the document was amended.

3.9 Officers acknowledge that the guidance did, unintentionally, appear to focus overly much on the houses to the detriment of the mansion blocks. This has been rectified by amending the wording to make clear whether it is referring to houses, mansion blocks or both. Additional text has also been added to supplement the existing assessments in the Appraisal and guidance in the Management Strategy so that the full breadth of their contribution to the

conservation area are appreciated in the document. More details of officer's responses are in the consultation responses table, appended.

- 3.10 Two of the existing four buildings or spaces identified to make a negative contribution are on the eastern edge of the conservation area (the garage block and the unkempt area of garden at the east end of the mansion blocks). In response to consultation responses we have added a fifth item to this list, the refuse and recycling stores on Swains Lane.
- 3.11 The issue of whether an Article 4 direction is required to control works that currently are carried out under permitted development rights was raised at the public meeting, and in some of the consultation responses. . Article 4 was recommended by officers for Holly Lodge in 2009 but refused by Environment Sub committee in light of strong local opposition. The case for the Art 4 has not diminished, but due to the situation appearing relatively stable we are not proposing to introduce Article 4 now, but will monitor situation. There is clearly some feeling on the estate that work carried out under permitted development rights is harming the character and appearance of the estate. Officers will continue to monitor the situation, and if the condition appears to worsen then we will reconsider the need to use this planning tool.

Energy Efficiency Planning Guidance

- 3.11 5 people responded via the online form and one further response was received by post. Councillor de Souza submitted comments on behalf of residents. The content of these responses varied from straightforward endorsement of the guidance, to detailed comments of how the guidance could be amended or revised.
- 3.12 The 5 online respondents answered the standard questions on the feedback form as follows:

	Do you consider the level of advice, information and/or guidance in the draft planning guidance document is a) enough, b) too much, c) not enough?	Are there any specific parts of the draft planning guidance document that you disagree with and/or would like to see changed?	Do you consider that works carried out in accordance with this draft planning guidance would result in the preservation of the character and appearance of the conservation area?	Do you think that the planning guidance has identified all the opportunities for improving energy efficiency/reducing greenhouse gas emissions in Holly Lodge Estate Conservation Area?
1	Not enough	Yes	No (Directly Yes, Indirectly No)	No
2	Enough	Yes	No	Yes
3	Enough	No	Yes	Yes
4	Enough	No	Yes	Yes
5	Not enough	Yes	Yes	No

- 3.13 The additional comments and questions also received on the feedback forms and by the additional written responses are set out in the table appended to this report. The guidance document has been amended in light of these comments wherever possible, and the table includes notes of what officers' response was and/or how the document was amended.
- 3.14 The content of the additional comments ranged widely and in most part was constructive comment or advice which officers have been able to incorporate into the document. A number of responses wished to see either greater or lesser control over certain elements of development (e.g. less control over solar panels, less control for leaseholders of flats over double glazing; more control over removal of original front doors, paving of front gardens etc) which are either outside the control of the Council, or would require the introduction of an Article 4 Direction.
- 3.15 There was clear concern about the achievement of Camden's targets for CO2 reduction in one (anonymous) response, and a high level of awareness and knowledge of retrofitting; climate change and energy efficiency was demonstrated in the comments that were received.

4. CONCLUSION

- 4.1 The conservation area appraisal and management strategy provides an up to date assessment of the character and condition of the conservation area, and provides clear guidance on how development in the area should be designed so as to preserve and enhance the special character and appearance which far exceeds the level of detail that was available in the previous draft conservation area statement. This will be a material consideration for planning officers and planning inspectors when considering planning applications, and will be a useful guide to homeowners and developers in understanding how development proposals are likely to be considered by the Council. The new appraisal will help prevent further inappropriate development that could harm the character and appearance of the conservation area.
- 4.2 The need for greater controls over permitted development was discussed at the public meeting, and identified as necessary in some consultation responses. The need for Article 4 on the estate will be monitored.
- 4.3 The Energy Efficiency planning guidance promotes the use of an energy hierarchy based approach, expanded to include consideration of the heritage significance of the buildings, which prioritises low cost, lower intervention works first. It has been drafted to set this guidance in the context of the current issues of climate change and fuel depletion so that the imperative on the Council and residents to address this is understood, along with technical guidance and sources of advice and information which will assist residents when considering works they want to carry out themselves, or when prompted by Green Deal providers. The guidance will assist those wishing to energy

upgrade their home to do so in a way that will preserve the character and appearance of the conservation area.

5. COMMENTS OF THE DIRECTOR OF FINANCE

- 5.1 The Director of Finance has been consulted in the preparation of this report and comments as follow:
- 5.2 All costs of implementing the actions in this plan will be covered within existing resources.

There are no further comments to add.

6. COMMENTS OF THE BOROUGH SOLICITOR

- 6.1 The Borough Solicitor has no comments on the report.

Appendix 1 Table of consultation responses – HLE CAA

Appendix 2 Holly Lodge Estate Conservation Area Appraisal and Management Strategy

Appendix 3 Table of Consultation responses – HLE EEPG

Appendix 4 Energy Efficiency Planning Guidance for Holly Lodge Estate Conservation Area