

Report For:	Executive
Date of Meeting:	17 August 2020
Report Of:	Service Director, Planning and Transport
Report Author:	Sara Farr, Planning Policy Officer

Subject:	Plaiters' Lea Conservation Area								
Lead Executive Member(s):	Cllr P Castleman								
Wards Affected:	South								
Consultations:	<table> <tr> <td>Councillors</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Scrutiny</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Stakeholders</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Others</td> <td><input checked="" type="checkbox"/></td> </tr> </table>	Councillors	<input checked="" type="checkbox"/>	Scrutiny	<input type="checkbox"/>	Stakeholders	<input checked="" type="checkbox"/>	Others	<input checked="" type="checkbox"/>
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Others	<input checked="" type="checkbox"/>								

Recommendations

1. That Executive is recommended to agree:

- (i) **To change the name of the Plaiters' Lea Conservation Area to the "Plaiters' Lea: The Hat District";**
- (ii) **The extensions to the Plaiters' Lea conservation area boundary;**
- (iii) **The Management Plan; and**
- (iv) **The Conservation Area Appraisal.**

Summary

2. This report is divided into four parts:

- (i) **Part I. Change of Name.** The conservation area was named to reflect the history of hat manufacturing which took place in the area. Plaiters' created strips of straw to be made into hats. The river Lea runs through the conservation area and was used by the industry. However, the area has become more commonly referred to as 'the Hat District' and it is proposed the name is changed to incorporate this term in the name. Historic England has suggested a compromise of 'Plaiters' Lea: The Hat District'.
- (ii) **Part II. Change of Boundary.** The conservation area was recently reviewed in line with current legislation. It had been proposed that the boundary be extended along Guildford Street to incorporate listed and hat manufacturing-related properties and a vacant lot sited at each end of the street. The proposed change of boundary incorporates these properties. Owners and residents have been consulted.
- (iii) **Part III. Management Plan.** The Management Plan was drafted following an initial meeting with councillors and officers and has been the subject of a consultation. It will provide a management framework for further activity within

the conservation area and will be published on the Council website. It will also give officers further information regarding Local Plan⁽¹⁾ policy LLP30 (which seeks “to protect, conserve and enhance” the Historic Environment).

- (iv) **Part IV. Conservation Area Appraisal.** The council has contracted a consultant to produce an up to date appraisal, following the English Heritage Area Assessment of 2011. This is a technical document providing information on the current environs of the conservation area.

References

3. Luton Local Plan 2011-2031. Available at:
<https://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/Pages/Local%20Plan%202011%20-%202031.aspx>

Part I. Change of Name

Background

4. Plaiters' Lea Conservation Area was established in 1991.
5. English Heritage Historic Area Assessment (2011) states: [The area is] "one of five Conservation Areas in the town – and is flanked by the train station on the north and the Arndale to the south. It contains the towns' most densely concentrated, and some of the best preserved, surviving elements of the hatting industry and related trades, as well as other industrial, commercial and residential components. The Conservation Area lies to the north of the historic core of Luton and it is clear that development and growth here was entirely contingent upon the health of the hatting industry – as the industry flourished so did the numbers and variety of buildings connected to it. ... 'Plaiters' Lea' as a name, is a modern invention and part of a successful attempt to brand the heartland of hat production in the town and give it a focus in future urban and commercial regeneration".
6. English Heritage also note that Luton's hat district is "an artisanal quarter in the manner of the Birmingham Jewellery quarter or the Northampton Boot and Shoe quarter... that is both significant and visually impressive" and that the town's strategic planning sought to give the area a "clear role and identity."
7. The hat district was predominately associated with the manufacture of both straw and felt hats.
8. The term 'plaiter' refers to one step (plaiting straw to create strips which were then sewn into hats) in straw hat production. Other steps in making straw hats included splinting, milling, sewing, blocking, dying, stiffening, trimming and finishing.
9. The name Plaiters' Lea is therefore not fully reflective of the industry activity within the conservation area.
10. 'Lea' in the area title refers to the River Lea, which runs through Luton and the conservation area. During the peak of hat manufacturing, the river was polluted industrial effluent such as bleach and dyes.
11. Today the River Lea is cleaner and seen as a feature of the town. The river is less visible in the town centre as it is mostly culverted, although it is open in a section between Guildford Street and John Street within the conservation area, and plans are in place further open it on Silver Street.

The Current Position

12. Currently, the term 'Hat District' is more commonly used when referring to 'Plaiters' Lea' in documentation, presentations, etc to clarify the area being discussed.
13. The change of name is proposed to:
 - (i) Give the conservation area a clearer identity and brand more recognisable to modern residents and encourage visitors to the town/area, whilst continuing to appeal to those with a historical interest.

- (ii) More fully reflect the industry that took place within the conservation area.
- 14. The importance of the term 'hatter' is reflected in the nickname of Luton's football club (the 'Hatters'). This link will be strengthened when the club relocates to Power Court, which is adjacent to the conservation area.
- 15. The Constitution makes no reference to conservation areas, with the exception of Part 3, paras 21-27, which relates to the planning approval process.
- 16. Historic England have been consulted about the proposed name change and their response is:

"We consider that 'Plaiters' Lea' as a name has historical significance and an authentic resonance with the place, and to change the name of the conservation area to only 'The Hat District' is to lose something of that significance, and dilute its interest. We would therefore suggest that, for the purposes of designation and indeed place branding and marketing, a compromise would be to use both. E.g. "Plaiters' Lea: The Hat District".

Goals and Objectives

- 17. That the Plaiters' Lea conservation area is renamed "Plaiters' Lea: The Hat District", enabling a stronger, more recognisable identity to be established.

Proposal

- 18. That Executive agree the name of the Plaiters' Lea Conservation Area be changed to "Plaiters' Lea: The Hat District".
- 19. The alternative suggestions are:
 - (i) That the name 'Plaiters' Lea Conservation Area' be retained, or
 - (ii) That the name be amended to 'The Hat District Conservation Area'

Key Risks

- 20. The general public and visitors to the town do not understand the significance of the name 'Plaiters' Lea' and the historically important industry to which it refers. If we do not add 'the Hat District' to the area name, it could affect opportunities to promote the brand, encourage visitors and bring investment and income to the area.

Consultations

- 21. Heritage England was asked for their comments regarding the name change. See paragraphs 17 and 18 above.

Alternative options considered and rejected (please specify)

- 22. An alternative option is to retain the existing name 'Plaiters' Lea Conservation Area'. It is considered that this name may not be immediately understood by visitors to the area and does not fully reflect the industry that took place.

23. Another alternative option is to rename the area the “Hat District Conservation Area”. Historic England did not agree with this option and it is considered sensible to follow their advice.

Alternative options considered and rejected (please specify)

24. The alternative options are presented above for Executive to consider.

Appendices Attached

- Appendix E: Integrated Impact Assessment

List of Background Papers - Local Government Act 1972, Section 100D

- Plaiters' Lea Conservation Area, Luton: Historic area assessment. Available at:
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20001.pdf>

Part II. Change of Boundary

Background

- 25.** A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires LPA's to designate conservation areas and to review them from time to time which can, amongst other matters, lead to existing boundaries being extended or reduced.
- 26.** The boundary of the Plaiters' Lea conservation area has been reviewed by specialist heritage consultants commissioned to review the conservation area as required by legislation and as part of that work have proposed the boundary change.
- 27.** The Legal department have confirmed that changing the boundary of the conservation area is an Executive decision.
- 28.** The English Heritage Historical Area Assessment of the conservation area includes descriptions of the properties just outside the existing boundary between 40 and 60 Guildford Street, and notes their relevance to the conservation area.
- 29.** Further descriptions of the merits/history of these buildings can be found in the Historical Area Assessment:
 - Page 44 para 2 – residential buildings
 - Page 49 para 1 – 52–60 Guildford Street
 - Page 57 para 3 – 50 Guildford Street
 - Page 58 (photo) – 50 Guildford Street (which notes the premises are “of a quality that merits inclusion” in the conservation area).
 - Page 67 para 3 – 42-48 Guildford Street
 - Page 68 – photo of 42-48 Guildford Street
 - Page 76 para 2 and phot – 50 and 52-60 Guildford Street
 - Page 80 para 4 – 50 Guildford Street
 - Page 82 para 5 – 40-48 Guildford Street
 - Page 205 – Field Record Sheet – 52-60 Guildford Street
 - Page 209 – Field Record Sheet – 50 Guildford Street
 - Page 213 – Field Record Sheet – 42-48 Guildford Street
- 30.** The Historical Area Assessment notes at page 91 “one of the primary recommendations arising from this work is that the boundary of the Plaiters' Lea Conservation Area should be reviewed, and English Heritage would promote the inclusion of the northern side of Guildford Street west of 40 Guildford Street. The buildings here are all intimately associated with the activities that define the special character of the Conservation Area and the new inclusion would encompass the Alexon Factory at 42-48 Guildford Street, the Balfour hat factory at 50 Guildford Street and the adjoining row of terraced properties – 52-56 Guildford Street, which were

clearly built in association with the adjacent factory and are residential-scale, domestic, production centres.”

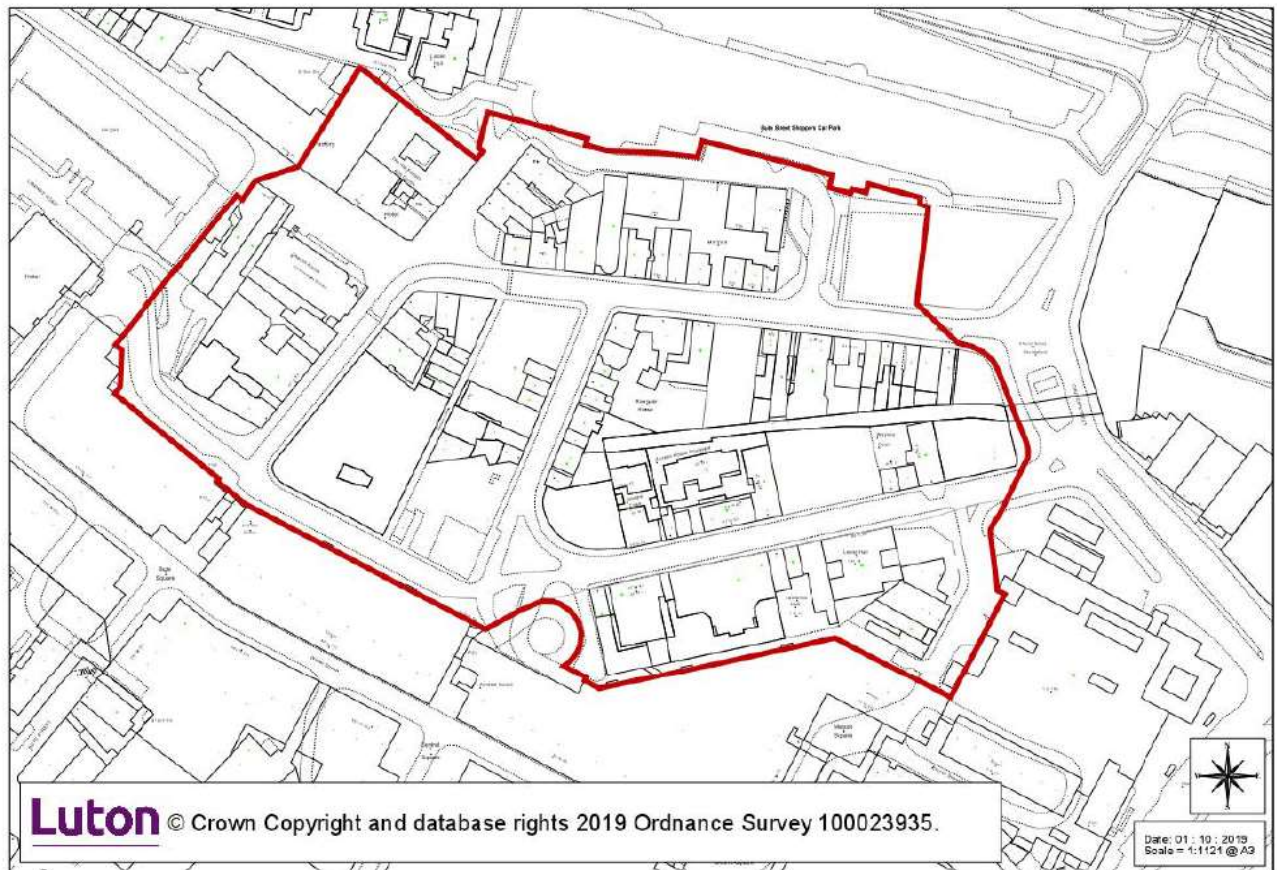
31. The Appraisal (see Section D) also considers the buildings in Guildford Street (see 3.3):

- Page 29 para 2 – 42-48 Guildford Street
- Page 29 para 4 – 50 Guildford Street
- Page 29 para 6 – 52-60 Guildford Street

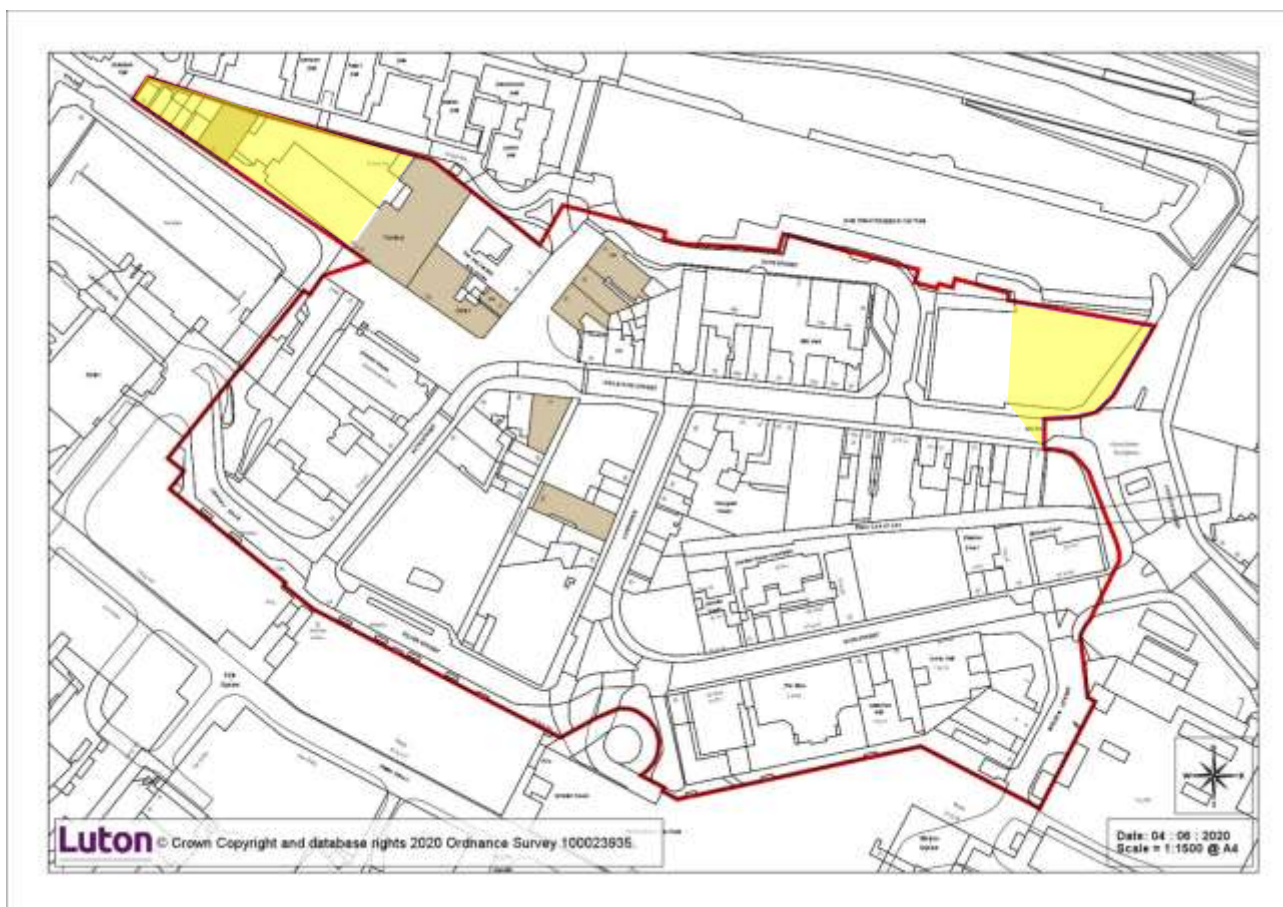
The Current Position

32. Following a review of the conservation area, it is proposed to extend the boundary allowing the inclusion of properties northwest on Guildford Street and the car park on the eastern edge of Guildford Street at the junction with Church Street in its entirety. This would bring further listed buildings within the boundary.

33. The current boundary of the Conservation Area is shown below.



34. The proposed boundary (with listed buildings highlighted in brown) is shown below, with the additional properties brought into the boundary highlighted in yellow.



Goals and Objectives

35. These additional sites are under consideration for inclusion in the conservation area to:
- a) bring the listed (40 and 50 Guildford Street) and historical buildings which contribute to the conservation area within its protection, creating a more cohesive area;
 - b) retain the character of the area;
 - c) ensure any new developments on the two sites are sympathetic to, and enhance, the conservation area. They should remove any pre-existing negative impact upon the conservation area; and
 - d) provide further powers for officers around Local Plan Policy LLP30.

Proposal

36. It is recommended that Executive agrees the extension of the boundary of the Plaiters' Lea conservation area in accordance with the map shown at paragraph 36.

37. The designation of a conservation area gives the LPA additional powers over the development and the use of land within it. The implication of introducing a wider conservation area boundary is that additional property owner/occupiers will be subject to restrictions on their permitted development rights, including requiring specific planning permission from the LPA to carry out roof alterations to a dwelling house and install, alter or replace microwave antenna or its support apparatus. In addition, in determining a planning application within a conservation area, the LPA must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
38. As a result, this interference engages Article 8: Right to respect for private and family life and Article 1 of the First Protocol: Protection of Property, to the Human Rights Act 1998. However, bearing in mind the legal duties imposed pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990 highlighted above, it is considered that the recommendation to extend the conservation area boundary is in accordance with the law, proportionate and balances the needs of those property owners/occupiers with the wider public interest.

Key Risks

39. That the additional buildings/brownfield site are altered or redeveloped in a manner which may impact the character of the conservation area.

Consultations

40. There is no statutory requirement for LPAs to consult with anyone before a conservation area is designated. However, Historic England advise LPAs to consult as widely as possible. Consequently, a public consultation was held from 10 June 2020 to 8 July 2020. A virtual public meeting was also held on 26 June. All residents, leaseholders and landowners were notified in writing, along with Luton Heritage Forum. Letters were also sent to utilities companies, Chamber of Commerce, and highways department for their comments.
41. Two responses were received, one for the proposal and one (from the Monopro Pension Fund who own 40-48 Guildford Street) against, with comments regarding the former factory currently occupied by the university and the library car park. Further details are shown at Appendix A.

Alternative options considered and rejected (please specify)

42. To leave the boundary as it currently stands. This was rejected as it leaves buildings which contribute to the history and character of the area exposed and a site on the eastern edge open to unsympathetic redevelopment.
43. To include the site of the old library car park accessed from Library Road. This was rejected as the site does not contribute to the character of the conservation area and at present its future use is not known.

Appendices Attached

- Appendix A: Summary of consultation responses to boundary change
- Appendix E: Integrated Impact Assessment

List of Background Papers - Local Government Act 1972, Section 100D

- Plaiters' Lea Conservation Area Luton – Historical Area Assessment [Ref 069-2011]. Available at:
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20001.pdf>

Part III. Management Plan

Background

44. The English Heritage Historical Area Assessment of the conservation area recommends the drawing up of a management plan for the area (page 91).
45. A new Management Plan has now been drafted and is presented to Executive for their approval.

The Current Position

46. Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires a LPA from time to time to formulate and publish proposals for the preservation and enhancement of its conservation area(s) and such proposals shall be submitted for consideration to a public meeting, the views of which shall be taken into account by the LPA.
47. At present there is no management plan for the conservation area.

Goals and Objectives

48. The management plan will provide a management framework for further activity within the conservation area and will be published on the Council's website.
49. The management plan will give further information for planning officers with regards to Local Plan Policy LLP30.

Proposal

50. It is recommended that Executive agrees the Management Plan for the Plaiters' Lea conservation area.

Key Risks

51. If there is no management plan, there will be less guidance for officers, the public and members to inform future activities within the conservation area.

Consultations

52. The management plan was drafted after an initial workshop on 19 September 2019 with eight councillors and four officers participating.
53. Public consultation on the draft management plan was held via the consultation portal from 10 October 2019 to 20 November 2019. Letters were sent to all properties within the conservation area at the start of the consultation.
54. Drop in events were held for the public at the Hat Factory on 10 and 30 October 2019, with free guided tours of the area given for those interested.

55. In total 110 comments were received across all the consultations and these are summarised at Appendix B.
56. The Management Plan has been shared with and is supported by the Portfolio Holder.

Alternative options considered and rejected (please specify)

57. No management plan is put in place for the conservation area. This was rejected as there would be no guidance available regarding future activity within the conservation area.

Appendices Attached

- Appendix B: Summary of consultation responses to Management Plan
- Appendix C: Management Plan
- Appendix E: Integrated Impact Assessment

List of Background Papers - Local Government Act 1972, Section 100D

- Plaiters' Lea Conservation Area Luton – Historical Area Assessment [Ref 069-2011]. Available at:
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20001.pdf>

Part IV. Conservation Area Appraisal

Background

58. English Heritage undertook a historic area assessment in 2011, and recommended that a “comprehensive appraisal of the conservation area is prepared and adopted by the Borough Council”.

The Current Position

59. The council contracted Urban Vision to carry out a conservation area appraisal. This technical document is attached at Appendix D.

Goals and Objectives

60. The objective of the appraisal is to give an up to date guide to the buildings and environs of the conservation area.

Proposal

61. It is recommended that Executive agrees the appraisal of the Plaiters' Lea conservation area.

Key Risks

62. The risk is that the current situation of the conservation area will not be fully understood without an up to date conservation area appraisal.

Consultations

- 63.** This is a technical document and therefore did not have a public consultation. Comments were sought from Historic England and incorporated into the final document. The Appraisal has been shared with and is supported by the Portfolio Holder.

Alternative options considered and rejected (please specify)

- 64.** No modern appraisal of the conservation area is agreed. This was rejected as an understanding of the current buildings and environs of the conservation area is needed to engage in further activities in the area.

Appendices Attached

- Appendix D: Conservation Area Appraisal
- Appendix E: Integrated Impact Assessment

List of Background Papers - Local Government Act 1972, Section 100D

- Plaiters' Lea Conservation Area Luton – Historical Area Assessment [Ref 069-2011]. Available at:
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20001.pdf>

List of Appendices

- Appendix A: Summary of Consultation Responses to Boundary Change
- Appendix B: Summary of Consultation responses to Management Plan
- Appendix C: Management Plan
- Appendix D: Conservation Area Appraisal
- Appendix E: IIA

Implications - an appropriate officer must clear all statements

For CLMT only Legal and Finance are required

Required

Item	Details	Clearance Agreed By	Dated
Legal	<p>There is no formal designation procedure of a conservation area. The statutory procedure simply involves a council resolution to designate being made. The date of the resolution is the date the conservation area takes effect.</p> <p>Notice of the designation must be published in at least one local newspaper circulating in the Council's area and in the London Gazette. The Secretary of State and Historic England must also be notified. There is no requirement to notify the owners and occupiers of premises in the area. However, the Council may decide to do so.</p>	Steven Sparshott (Senior Solicitor, Planning).	28/07/20
Finance	There are no direct financial implications to the council regarding the proposed changes.	D Lambert, Finance Business Partner	29/07/2020
Equalities / Cohesion / Inclusion (Social Justice)	The name change will make the area more identifiable to residents of, and visitors to, Luton.	Maureen Drummond, Interim Equalities Manager	27/07/2020
Environment	The proposed boundary change will ensure further buildings relating to Luton's hat manufacturing heritage are protected within the conservation area. This could also result, indirectly, in improvements to the built environment and streetscape in this area of the town.	Keith Dove, Strategic Policy Adviser	27/07/2020
Health	The opportunities for investment, increased footfall for businesses and marketability of the area, along with environmental improvements will benefit residents' wellbeing.	L Hubber	24/07/20

Optional

Item	Details	Clearance Agreed By	Dated
Community Safety			
Staffing			
Other			