

# **Plaiters' Lea: The Hat District Conservation Area Management Plan June 2020**

**Regeneration, Enhancement, Protection, Management**





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# 1. Introduction

## 1.1 Purpose and Content

This is a management plan for Plaiters' Lea: The Hat District Conservation Area in Luton Town Centre (see Plan 1). It deals with the regeneration, enhancement, protection and management of the Conservation Area.

The definition of a conservation area is an 'area of special architectural historical interest the character or appearance of which it is desirable to preserve or enhance'. Heritage is protected for its cultural value, but is also a powerful economic driver and a basis for physical and economic transformation.

Plaiter's Lea: The Hat District Conservation Area has seen the decline of traditional industries. It is identified as being at risk on Historic England's At-Risk Register. However, the area also has clear potential as a place for new economic, social, cultural and recreational activities. Its location near to the town centre and the railway station mean that the western part of the Conservation Area has supported heritage-led regeneration and attracted new investment, though not all investment has been positive. There is considerable potential for sensitive, heritage-led regeneration to continue and to spread across the eastern, central and south parts of the Conservation Area.

As part of the process of preparing this Management Plan and accompanying Character Appraisal, the boundary of the Conservation Area has been amended and the name has been changed from 'Plaiter's Lea Conservation Area' to 'Plaiter's Lea: The Hat District Conservation Area'.

Part 2 of this document sets out the overall aims and strategy for the Conservation Area. Part 3 deals with regeneration and enhancement. Part 4 deals with protection and Part 5 deals with management of the Conservation Area. Part 6 deals with local authority properties and land.

## 1.2 Statutory Duty

Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 deals with the 'Formulation and publication of proposals for preservation and enhancement of conservation areas'. This places a duty on local planning authorities 'from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas'. Such proposals must be the subject of consultation.



## 2. Aims and Strategy

### 2.1 Aims

The overall aims of this management plan are:

- To guide sustainable, heritage-led economic development, physical regeneration and transformation, to help realise the full cultural, economic and community potential of the conservation area.
- To ensure the protection and management of the conservation area and provide a basis for effective conservation and enhancement;

### 2.2 Conservation Strategy

Conservation area status is not about creating barriers to change, but about enabling and delivering change whilst also preserving or enhancing the character or appearance of the area. This is especially the case in the Plaiters' Lea: The Hat District Conservation Area, where conservation and regeneration should be complementary activities. Creating investor and business confidence is key to securing the longer-term conservation of the area.

Conservation of the Plaiter's Lea: The Hat District Conservation Area involves:

- Securing investment to achieve the high-quality refurbishment and full productive use of all levels of all buildings in the conservation area;
- Ensuring that all buildings are well-maintained and in a good state of repair, using appropriate conservation techniques;
- Securing external enhancement and/or redevelopment for buildings that have a neutral or negative impact on the special architectural or historic interest and character of the area;
- Achieving high-quality sustainable development of vacant sites, including informal surface car-parks;
- For all new build or external works, securing very high-quality, creative design to complement, but not imitate, the existing townscape;
- Encouraging use of experienced and creative design teams and building contractors, specialising in historic buildings and areas;
- Encouraging new development with superior environment performance;
- Improving the public realm, including opportunities for greening of the area, to create attractive streets and spaces which are flexible to accommodate different economic, recreational and cultural activities;

- Reversing alterations that cause harm to the character, appearance and special interest of the area.
- Taking opportunities to open-up and provide access to the River Lea through the development of vacant land, ensuring that development incorporates it into its design and layout.





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# 3. Regeneration and Enhancement

## 3.1 Heritage-Led Economic Development Strategy

### Refurbishment and Reuse

There are numerous vacant and under-used buildings that contribute to the special architectural or historic interest of the Conservation Area.

From vacancy levels and the general condition of buildings, it is clear that the west part of the Conservation Area is more economically viable and more able to attract investment. Most buildings are in productive use and in a reasonable or good state of repair. This reflects the link through the north part of the area between the Railway Station and the Town Centre.

The central, east and south parts of the Conservation Area have obvious issues around vacancy, lack of investment and associated lack of maintenance. This includes historic buildings, but also some relatively recent and poorly-designed development from the late 20<sup>th</sup> century.

There are various factors that are likely to create greater business and investor confidence in the under-performing parts of the Conservation Area. These are:

- The impact of continuing regeneration of the west part of the Conservation Area;
- Proximity of the railway station and fast (25 minute) and frequent services to London stations;
- The lack of available housing sites elsewhere in Luton;
- The current lack of local co-working space;
- Uses that add to the perceived 'cool' of the area as focus for creative industries and arts, such as music venues;
- Relative affordability of properties.

Due to the peripheral location and lower rentals, the conservation area is attractive to smaller independent businesses. Acquisition of properties while they are more affordable can be a way of businesses or social enterprises proofing themselves against longer-term increases in rentals, as the area regenerates.

Owners will be contacted to discuss plans, opportunities or barriers to creative and sensitive refurbishment and reuse. The local authority has advisory and enabling roles, in addition to its regulatory function.



## Remodeling and Redevelopment

Owners of buildings that harm the character of the area or have neutral impact will also be contacted to discuss options for external remodelling (to improve their appearance) or demolition and sustainable redevelopment.

Some of the larger buildings offer significant refurbishment or redevelopment opportunities:

- The Job Centre building is appropriate in scale, but architecturally unremarkable. Recladding and new fenestration could be a solution, or redevelopment on a similar scale. This is a key development opportunity at the heart of the area, on a direct routes between the main Railway Station and the Town Centre.
- The late 20<sup>th</sup> century developments along John Street could be redeveloped or substantially remodeled.
- The School of Art and Design is an important late factory building, but could be improved by glazing the ground floor and reinstating more sympathetic horizontal strip glazing to upper floors, for example using dark grey metal framed windows. This also applies to numerous other buildings with uPVC window units, where reinstatement of sympathetic timber or metal windows, based on past evidence, would enhance the character and appearance of the area.

## Development Sites

The numerous vacant sites and car parks also present opportunities for new sustainable development. Collectively, these provide considerable development capacity within the Conservation Area.

Site owners, including local authority departments, will be contacted to discuss development plans and opportunities for these sites. Where loss of parking is an issue, incorporation of parking at ground floor level into new development should be considered. However, there are other parking alternatives in the area and various public transport options, so car-free development should be encouraged.

Development and design briefs should be prepared for development sites, to set clear expectations in terms of design quality. This could form part of the master-planning of the area.

## Uses

Whether through new-build or reuse, the most sustainable and effective regeneration of the area will be achieved from a balanced mix of uses. Residential uses should be encouraged at upper floor levels, but not at street level. This is in the interest of both residential amenity and also to maintain vibrant and active street frontages.

Repopulation of the Conservation Area offers various advantages in terms of sustainable live/work patterns and creation of a more prosperous and vibrant Town Centre.

The current poor condition of some parts of the Conservation Area is indicative of lower land values. Lower rentals can help to create a magnet for micro and small independent businesses, and creative businesses (including music venues). However, lower values also make capital investment less viable, due to lower returns.

The long-term conservation of the area is likely to depend on higher land values being achieved in the longer term, resulting from higher levels of demand. As the area develops, values and rentals are likely to rise and possibly to equalise with the wider Town Centre.

Possible uses are as follows:

**Ground floor** uses include: commercial (A use classes), cultural, community, recreational, leisure and other public service uses.

**Upper levels** uses include: some commercial uses (B1), such as co-working and other enterprise space or hotel accommodation.

**Other uses:** Performance, gallery space and other publicly accessible uses would also be suitable at all levels.

As with any area that mixes residential with commercial and recreational uses, care is required to manage the potential for conflict between uses. This is especially important for historic buildings, which may have lower specifications for noise insulation.

For example, planning conditions could be used to ensure that evening uses do not conflict with residential uses. Residential uses should not be permitted where they would create conflict with existing businesses.

## Promotion and Marketing

Heritage is part of the way the area should be marketed, but also being careful not to reinforce common misconceptions that heritage is a barrier to change. So the area can be marketed as a historic quarter of the town, but also a place of change, economic potential and opportunity.

Publicising the regeneration of the area can be a way of creating business and investor confidence. This is necessary to secure the repair, refurbishment and reuse of buildings.

Against the context of the Town Centre Masterplan, the 'Hat Making District' or other brand name should be developed as a basis for marketing of the area, including an identity for signage and interpretation. A 'core script' could be agreed between the various parties involved in promotion and marketing, to ensure a clear and consistent message. This could focus on the intention to promote the area for arts and creative industries.

## 3.2 Design

The Conservation Area has been harmed by misconceptions about how to respond to the historic context. John Street in particular has suffered from low-quality, 'heritage'



parodies. These are characterised by poor materials (such as plastic columns), crude detailing and a lack of architectural distinctiveness. It is important to raise the quality of design of new development in future.

Good conservation is about preserving and adapting the best of the old. It is not about requiring stylistic imitation in new development. Indeed, this is at odds with the area's character, which is based on architectural diversity resulting from change over time, with local, national and international influences. Nor does conservation imply necessarily the use of elaborate or decorative styles. Rather the aim is to attract site-specific high-quality designs that complement the townscape characteristics of the area.

Creativity should be positively encouraged. The aim is to achieve new buildings that immediately add to the architectural interest of the area. Creative or innovative new architecture can add an authentic 21<sup>st</sup> century dimension to the special interest of the Conservation Area and avoid harming its authenticity. The combination of well-maintained historic buildings with creative new architecture and a well-designed public realm can result in urban environments of exceptional quality. This is the aim for the Plaister's Lea: The Hat District Conservation Area.

The importance of using a talented and creative design professional team can't be overestimated. Selection of under-qualified or under-experienced design professionals often leads to delay and difficulties in gaining planning permission.

Raising the quality of design may be achieved through:

- Making clear that the conservation area status should support creative and innovative design and not be a barrier;
- Design training for decision makers;
- Ensuring that planning decisions are informed by specialist design advice;
- Improved design guidance, for example on townscape, urban design and shopfronts;
- Master-planning and development and design briefs being prepared for key sites within the conservation area;
- Use of independent design review to help with assessment of significant development proposals.

## 3.3 Enhancement

### Maintenance and Repair

Luton Council will prepare, commission or signpost existing guidance on the repair, maintenance and refurbishment of historic buildings. This includes:

- Use of lime mortars for repointing of traditional buildings;
- Retention and conservative repair of historic fabric, in preference to wholesale replacement;
- Use of authentic materials and craft techniques;
- Ensuring alterations, such as sub-division of rooms, are reversible;
- Reinstatement of historic features, such as windows, doors and shopfronts.

In meetings with building owners, the need to use conservation specifications for repairs will be explained. This includes advice on the need and to employ conservation specialists to prepare maintenance and repair specifications and then selection of builders or contractors that have the necessary conservation skills and experience to undertake the works.

Funding will be sought to support building repairs (see later section on funding).

### Public Realm

As stated previously, the conservation area provides a focus for regeneration. Quality of environment is a factor in attracting people to live, work, visit and spend recreation time in the area.

The area's historic environment is an asset, but there are also challenges in terms of harm that has been caused, including cleared sites (some used for car parking), poor-quality buildings and mixed quality public realm. So enhancement of the area is a positive aim.

Enhancements include:

- Continuing the public realm improvements throughout the conservation area, using consistent design and materials (with reference to the emerging street-scape design guide);
- When undertaking public realm works, designing in potential for multiple-use of streets and spaces to allow for commercial, recreational or cultural activities;
- Where public realm is underused or poorly maintained and neglected, finding solutions to ongoing maintenance, considering redesign of the space or considering alternative uses for the land;



- For street lighting, reinstate historic designs or to use a high quality contemporary design throughout the conservation area;
- Improving street furniture and signage and, where possible, reducing clutter;
- Commissioning public art as part of the public realm and in new development;
- Looking for opportunities to provide interpretation and information about the conservation area;
- Looking into the feasibility of opening up the River Lea, including as part of the redevelopment of key sites.
- Where bins and service areas are in the public realm or visible from the public realm, approaching owners to discuss options relocating or screening them.

Luton Council will liaise with utility providers to ensure that public realm enhancements are not undermined by insensitive maintenance and reinstatement works.

## Greening

Whilst the character of the area is essentially urban, other considerations require that greening of the area be achieved. This can create benefits in terms of health, amenity and general quality-of-life. Greening will change the character, but is necessary to ensure the proper functioning of the area.

Greening may be achieved through:

- Installation of street trees and/or raised planting beds;
- Encouraging the creation of roof gardens in new development or the refurbishment of flat roofed buildings;
- Consideration of replacing one of the car parks with a new urban green space;
- Creative landscape design as part of new development.

Historic England's 'Streets for All' guidance will be taken into account.

## 3.4 Delivery

### Partnerships

In other parts of the country, similar peripheral historic areas often regenerate through a combination of private and community-led development, together with public sector investment.

Public sector investment can include the improvement of the public realm. Partners will be approached to discuss potential for undertaking public realm improvements.

Cross-sector partnerships are also an effective way of tackling sites and buildings. Partnership with community organisations can be a way of addressing viability challenges, as stated. This includes the Luton Heritage Forum and Think Luton. Other partners include the University, health agencies, businesses, the Business Improvement District, and other regeneration bodies.

### Compulsory Purchase and Asset Transfer

Where owners are failing to take action to regenerate buildings or sites, compulsory purchase may be considered by the local authority. This could include sites that would open up wider development opportunities.

Compulsory purchase could be undertaken, working with community partners which could then be the recipient through asset transfer. This can be a way of dealing with vacant and deteriorating properties. However, compulsory purchase is something to use as a last resort only, due to the considerable complexity and resource implications.



Asset transfer can involve transfer of the freehold, but can also be based on long-term leases. Community-led organisations can sometimes tackle viability challenges, creating opportunities for more creative fund-raising to cover capital costs.

## Funding

Public sector support for the enhancement and regeneration of the conservation area can include improvements to the public realm. Part of this can be achieved through existing budgets, by ensuring a common and coordinated approach to things like the provision and maintenance of signage, lighting and ground surfaces. This does mean that expenditure decisions consider not just low cost and maintenance, but also wider environmental and economic factors.

There may be opportunities for gaining heritage-related and non-heritage funding to support public realm works, buildings repairs and other enhancements. This includes:

- Historic area grant schemes;
- National Lottery Heritage Fund;
- Architectural Heritage Fund (to help develop projects and test viability);
- Regeneration or housing programmes and funding;
- Other lottery or public funding for specific projects;
- Independent foundations, in particular for community-orientated projects.

Depending on the nature of the project, the applicant could be the local authority, other local bodies, and local community organisations. Luton Council will look for opportunities to gain funding, where appropriate in partnership with other bodies.





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# 4. Protection

## 4.1 Special Duties

In planning decisions on development involving or affecting conservation areas and listed buildings, special statutory duties apply to the local planning authority. These are:

**Section 16 (2)** In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

**Section 66 (1)** In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or of any features of special architectural or historic interest which it possesses.

**Section 72 (1)** In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

In addition, Sections 69 and 71 contain duties regarding designation of conservation areas appraisal of conservation areas.

Compliance with the special duties requires the local planning authority to maintain inhouse expertise and capacity or to buy-in such expertise. This includes:

- Awareness of conservation practice and conventions (including international conventions and how they are applied in practice through planning legislation);
- Understanding of heritage legislation, designations and policy, and their interaction with other legislative frameworks;
- Application of economic tests for heritage against national planning policy and guidance;
- Assessment of special architectural or historic interest of the area;
- Analysis of both vernacular buildings and polite architecture, including understanding of different architectural movements;
- Understanding of historic environment research and analysis;
- Knowledge of technical conservation matters, including traditional and non-traditional materials, construction and techniques.

## 4.2 Local Planning Policy Context

The Luton Local Plan (2011-2031) was adopted in November 2017. This provides a basis for planning decision making. Key policies of relevance to the Conservation Area include:

LLP11 Creative Quarter

LLP25 High Quality Design

LLP26 Advertisements and Signage

LLP27 Open Space and Natural Greenspaces

LLP30 Historic Environment Policy

There is also guidance on shop fronts, which could be reviewed and then brought to the attention of property and business owners in the conservation area.

This management plan will be used to ensure heritage is dealt with in a robust way in any future revision of Local Plan policy, preparation of supplementary planning documents and/or any future plans for the area. The aims and strategy in Chapter 2 in particular should be taken into account.

## 4.3 Enforcement

### Alterations and Uses

Enforcement is an essential part of this plan, to ensure that the character of the area is not degraded through incremental unauthorised changes. Unauthorised uses can also compromise the area's economic potential. At the same time, formal enforcement action should be considered as a last resort, as set out in the following text.

A photographic audit of the area has been undertaken and provides a useful basis for checking on unauthorised works, in addition to monitoring the condition of the area. Streetview also has historic photographs.

The approach to enforcement is as follows:

- The best approach is to avoid unauthorised works and uses. Basic information on conservation area controls will be prepared and provided to all building owners and occupiers.
- Where unauthorised works have occurred, the preferred approach is to contact owners and agree remedial works and a timetable, without the need for formal action.
- Enforcement notices will be considered if informal negotiations prove to be ineffective.

## **Deterioration**

A similar approach should be taken when buildings are allowed to deteriorate. The approach to enforcement is as follows:

- The local authority will contact owners to discuss the development potential of the building, including suitable uses and the scope for alteration and/or extension. Funding or partnering opportunities may also be examined;
- If the condition continues to deteriorate, the owner will be asked to take steps to arrest the decline.
- Urgent Works or Repairs Notices will be considered as a last resort. Compulsory purchase is a further option (see earlier section).

Repairs notices can result in notice being served on the local planning authority to purchase the asset in question. This will be taken into account in any decision to serve a repairs notice.

## **Detriment to Amenity**

Enforcement action should also be considered to address buildings and land that are in an untidy state. Where negotiations with land owners prove to be ineffective, action under Section 215 of the Town and Country Planning Act 1990 will be considered.

# **4.4 Review**

## **Permitted Development**

An Article 4 direction should be considered to prevent further incremental harm to the special interest of the area through permitted development rights. This could include control of windows and doors, painting or other treatment of external walls and protection of chimneys.

An Area of Special Control for signage could also be considered.

## **Local List**

There is currently no local list in Luton. Conservation area status provides a higher level of protection than inclusion on a local list. However, a local list would still be useful, in helping to identify unlisted buildings of particular interest within the Conservation Area.

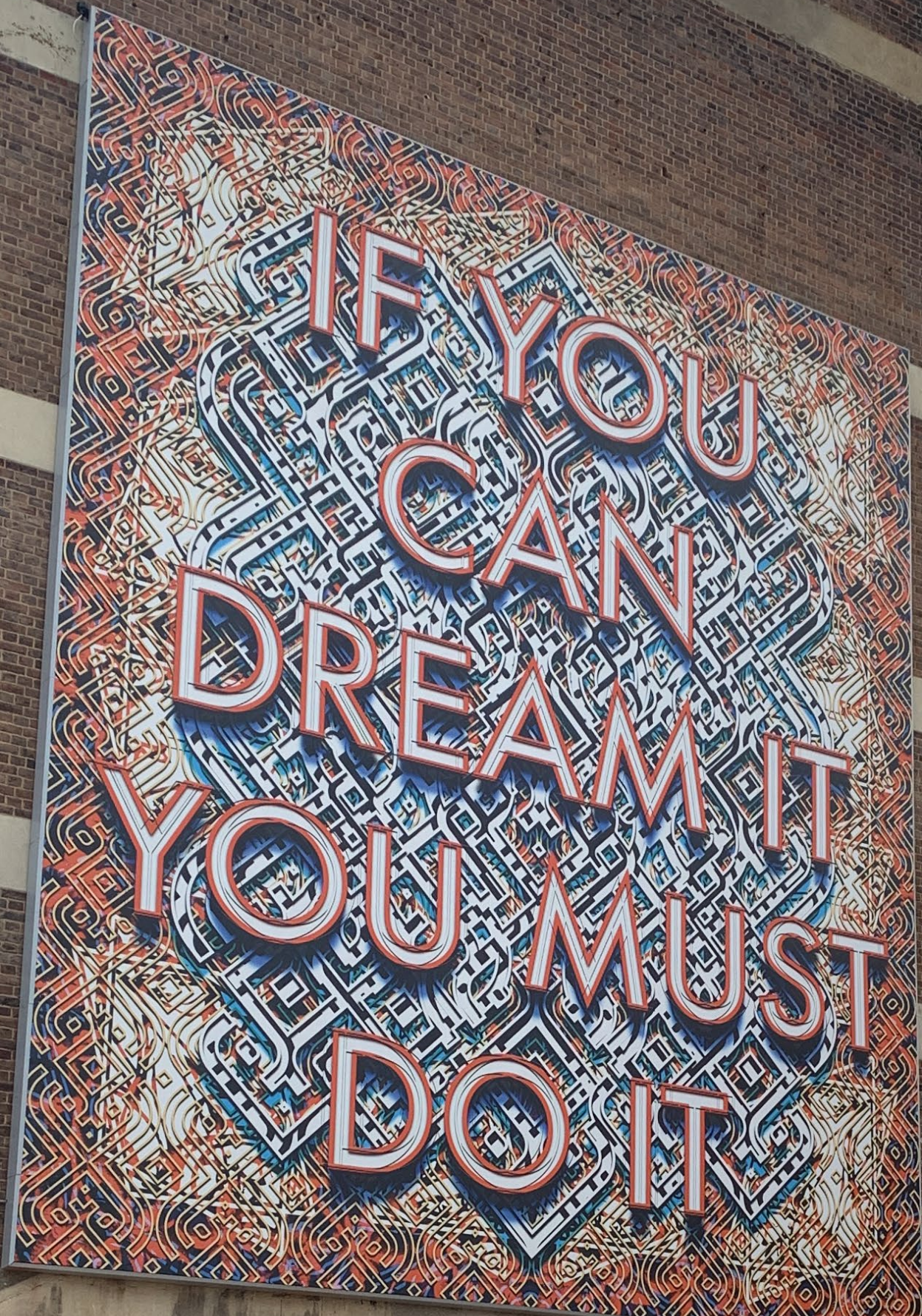
## **Conservation Area Boundary**

There is a statutory requirement to review the boundaries of conservation areas from time to time. Any extension to the conservation area should be based on assessment



of whether the additional area adds to the special architectural or historic interest of the Conservation Area. The boundary has been reviewed as part of the process of preparing this Management Plan and the accompanying Character Appraisal and additional areas in Guildford Street and Church Street have been added.





IF YOU  
CAN  
DREAM IT  
YOU MUST  
DO IT



# 5. Management

## 5.1 Information and Records

### Historic Environment Record

A specific web page will include details or links to all parts of the historic environment record, including statutorily listed buildings, conservation areas (including character appraisals and management plans), the emerging local list and details of other statutory and non-statutory designations.

### Guidance for owners

A web resource should be created to signpost building owners to relevant guidance on historic buildings and areas. Basic advice on heritage protection may also be included.

## 5.2 Buildings at Risk

The Plaiter's Lea: The Hat District Conservation Area is identified as being at risk on Historic England's At-Risk Register. This recognises issues of lack of maintenance, poor repair and vacancy. The 'Regeneration and Enhancement Strategy' within this document seeks to address this issue by attracting investment and new uses to the area. Luton Council will continue to advise Historic England on the risk status of this and other conservation areas, to inform the 'buildings at risk' reports.

Historic England's At Risk Register also deals with Grade 1 and II\* listed buildings.

There is no local buildings at risk survey, so grade II listed buildings are currently not assessed. Luton Council will seek to undertake a limited buildings at risk survey using the standard methodology for the listed buildings in the Plaiter's Lea: The Hat District Conservation Area. This may then form a basis for contacting owners and considering alternatives for any buildings identified as being at risk.





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## 6. Local Authority Properties and Land

### 6.1 Local Authority Property and Land

Where the council owns historic buildings, it is subject to the same heritage protection legislation and duties as other owners, so is required to keep them in a good state of repair. This is also necessary in order to maintain income potential and to ensure that the buildings realise their social and economic potential. Luton Council owned the Hat Factory, which was subject to asset transfer and refurbishment to create a new arts centre.

The council also owns sites in the Conservation Area, which can form the basis for a proactive role in securing and delivering exemplary regeneration projects.

### 6.2 Supporting Regeneration

The council will identify opportunities for heritage-led economic development and regeneration, using its land and any property it acquires.

Within the context of the Town Centre Masterplan, planning and design briefs will be prepared for land in the council's ownership and suitable partners to develop such sites will be sought.

Opportunities will be taken to open up the river and incorporate it into the redevelopment of sites.

Planning permission is in place for Power Court, which is outside of the Conservation Area boundary, but within its setting. This includes a new football stadium, around 550 residential units, a hotel, and food and drink outlets. This should help to trigger further heritage-led regeneration within the Conservation Area.

### 6.3 Highway Infrastructure

The local council will review traffic management in the area and look to enhance the public realm through improvements to lighting, parking, street furniture and signage. Aligning highway maintenance works to the aims and strategy in this plan will be critical.

In particular, Luton Council will ensure that priority is given to the experience of pedestrians and cyclists in terms of amenity, quality of environment, safety, accessibility and convenience.

## 7. Authorship

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