



Historic England

Consultation Response to the Draft London Plan







Historic England

Mayor of London
London Plan Consultation
GLA City Hall
London Plan Team
London SE1 2AA

Our refs: PL00033929
and PL00025626

By email: londonplan@london.gov.uk

1 March 2018

Dear Mr Khan,

Re: Draft New London Plan (December 2017) and Integrated Impact Assessment (November 2017)

Thank you for the opportunity to provide comments on the draft New London Plan ('the Plan'). Historic England is the public body that looks after England's historic environment. We champion and protect historic places, helping people understand, value and care for them. As the Government's advisor on the historic environment, and a statutory consultee in the context of Strategic Environmental Assessment, we are keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Development Plan process.

Accordingly, we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, Historic England is pleased to offer the following advice.

Historic England is deeply committed to the importance of London's heritage to achieving Good Growth, successful places, wellbeing and identity. To demonstrate this we have championed a Keep it London campaign to feed into the emerging London Plan. In December 2016 we published the results of an expert discussion group (available [here](#)) and include 5 recommendations for the London Plan. They were:

1. Let Londoners speak: *Find out what matters to people who live and work in London*
2. Celebrate London's character: *The London Plan should encourage future planning and design to be inspired by a place's historic character*
3. Put heritage at the heart of London's Future: *The London Plan should aim to integrate heritage into the core of planning, not as an add-on at the end of the process*



4. A new heritage strategy: *The Greater London Authority (GLA) and Historic England, together with partners, should develop a London Heritage Strategy that enables recommendation 3 to happen*

5. A more proactive role for Historic England: *Historic England should continue to act as strategic champion for heritage and the contribution it makes to London's future.*

Historic England has been working to engage Londoners in a variety of fora, through social media and through research projects to inform the new London Plan. (Recommendations 1 and 5¹). For Recommendations 2 and 3 it is refreshing that the Plan gives heritage a strong profile in Chapter 7 and that its contribution to London's character, to place-making and to culture is recognised. There remain gaps in the Plan which need attention to ensure these aspects are consistently reflected, and these will be addressed below. We continue to call for a Heritage Strategy so that the new Plan is delivered in a way that secures the place of heritage as central to the planning of London.

Context

London's heritage is the keystone of its identity. The legacy of previous generations during almost 2000 years of urban settlement, and c.500,000 years of human habitation before that, has given it an environment of almost unparalleled richness compared to other World Cities. The stories and historic associations behind London's townscape, landscape and archaeology promote understanding of the past, providing insights into London's evolution and diverse communities over time, and act to cement a sense of place and belonging in today's city. London's historic buildings, streets, monuments, views and unique experiences shape the identity and well-being of Londoners, offering social and economic opportunities in addition to the environmental qualities they bring. However, this resource is finite and, as the NPPF identifies, heritage assets are irreplaceable. Without appropriate management, heritage significance can be eroded quickly.

Historic England acknowledges that the challenge of delivering sufficient housing, employment and culture spaces to meet the needs of today's Londoners is unprecedented. London's population is now larger than it has ever been and continues to grow quickly. History and culture are factors drawing people to London, supporting its attractiveness for business, tourism and as a place to live. It is essential that London's special character is not eroded as the city grows. The need for future growth to be sustainable dictates that land should be used efficiently, which in London's varied urban and suburban places, with their diverse communities, creates a range of challenges and opportunities.

¹ Refer to the list of background documents for Historic England's research reports



To make the most of the opportunities and successfully meet the challenges that this growth creates, Historic England has actively engaged with, and will continue to engage with, all the Mayoral Strategies. Our aim is to ensure that the sustainable management of London's historic environment is acknowledged and integrated as a fundamental part of London's future growth. This is both in terms of policy and implementation. We welcome the meaningful cooperation that we have had with GLA officers in the development of new heritage policies.

The new London Plan will play a fundamental role in guiding planning decisions and borough and neighbourhood level development plans. Historic England strongly welcomes the plan-led approach that this Plan promotes. This is evident in both the Design and Heritage policies, which require Local Planning Authorities (LPAs) to focus on design codes and capacity assessment work. Historic area assessments and characterisation will also be essential to producing sustainable local policies and good planning decisions. However, we note that the resources required to effectively implement this approach are significant, particularly within LPAs following a decade of sustained cuts to specialist conservation advice. Between 2006 and 2017 London experienced a reduction of 30% in the number of FTE staff working within conservation and archaeology. In our view many boroughs may struggle to resource this work.

While the new social enterprise, Public Practice, which we are sponsoring, will help with the skills gap, we would encourage the GLA to consider further how they might support boroughs and other groups, such as Civic Societies and Neighbourhood Forums to do this work. Historic England can offer additional advice and programmes to support building capacity, but we would strongly encourage the Mayor to work with the sector to produce a Heritage Strategy which could help address this key issue.

De-risking heritage for development sites across London, by ensuring that its significance is properly understood, can also be achieved through joint working with Historic England on strategic projects. These include promoting characterisation in London to help determine the location, extent and massing of new development, and supporting the Greater London Archaeology Advisory Service's (GLAAS) review of London's archaeological priority areas. We would welcome the opportunity to discuss these projects in depth with you at a later date.

Strategic vision and Good Growth policies

National Planning Guidance states that protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development. Indeed, the appropriate conservation of heritage assets is a core planning principle within the English planning system. Historic England therefore welcomes the recognition in the draft London Plan that heritage is a fundamental part of Good Growth, as well as the references to local character (in policy GG2) and heritage (in policy GG5). These draw on the environmental and economic values of heritage. However, there is no equivalent recognition of the social value of heritage in



policy GG1, which we consider an omission that should be addressed. This value is well established through research reports and national policy statements, including in the Ministerial foreword to the Government's recent Heritage Statement².

Likewise, despite the weight attached to the historic environment in national legislation, policy and guidance, the language used in the Plan is not always consistent with this. This is evident in the strategic policies, with GG2 referring to the need to 'understand ... and use' local character, while requiring boroughs to 'protect' open spaces. The disparity in language is reinforced when reading across the Plan (notably chapters 7 and 8), and should be reviewed to ensure that the Plan accurately aligns with national planning priorities. We have additional concerns about the definition of sustainable development used in the Plan, which we address below.

A positive strategy for London's Historic Environment

The NPPF requires planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment. This should include making provisions for heritage assets most at risk, as well as taking account of opportunities to draw on the contribution made by the historic environment to the character of a place. To this end we welcome the increased profile of heritage in the Plan compared to the existing London Plan. This is evident in the heritage policies in chapter 7. The new policies positively engage with heritage in terms of its potential for place-making, as well as offering clear and positive direction that will support the conservation and restoration of heritage at risk assets; the effective management of World Heritage Sites and their settings; opportunities to gain maximum public value from London's archaeology; and the need to engage with heritage and character early in the policy making and design processes, including master planning and place making.

We also welcome the acknowledgement of the role of heritage in some other areas of the Plan. We would highlight the Town Centre policies in particular as demonstrating a joined-up approach to managing change in places whose unique identities and sense of place is often defined by important clusters of heritage assets. Nevertheless, when reading across the Plan it is evident that this consistency of approach is lacking from some key policy areas, which is likely to encourage development that will harm London's heritage in our view.

To ensure the Plan is in line with national policy and legislation relating to the historic environment and in order that it can provide certainty, clarity and can effectively deliver the aims, as set out in the Good Growth policies, we have identified a number of

² The Government's Heritage Statement 2017 issued by DCMS:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf The social benefits of heritage range from increased social cohesion and a greater sense of identity to improved wellbeing (p8)



alterations that we consider absolutely necessary to be made before the Plan is adopted. The most significant of these relate to the Small Sites policy H2; to the approach to character and heritage in Opportunity Areas policy SD1 and supporting information; and, the need to clarify the definition of sustainable development in the Plan and the glossary.

In addition to these major concerns, we also have a series of recommended amendments that will, in our view, help ensure that heritage is treated consistently across the Plan, in line with national policy. We have included all our detailed comments on the Plan in a table, as Appendix 1. Our response to the accompanying Integrated Impact Assessment (IIA) is at Appendix 2.

If these changes are made we would consider that the Plan helps to promote a positive strategy for the historic environment in line with para 126 of the NPPF. Historic England strongly believes that London needs a Heritage Strategy to support LPAs, neighbourhood and civic groups, developers and other stakeholders deliver heritage-led growth. In our view this is likely to entail elements from, and support the delivery of, other Mayoral strategies, including the Cultural Strategy and the Environment Strategy. While we understand that the GLA are committed to producing a London-wide Heritage Strategy, we would welcome a reference to this in the Plan.

Conclusion

This new London Plan has the potential to be a starting point for a far more positive approach to London's heritage. The acknowledgement that heritage is fundamental to Good Growth, in line with our publication '*Translating Good Growth for London's Historic Environment*', and support for this through the new policies, is welcomed by Historic England.

Similarly, we welcome the plan-led approach, and the greater profile of design in helping to deliver increased densities. The challenge of developing design codes and appraisal mechanisms, especially in the short-term, needs further thought. For the public to accept the scale of growth promoted in this Plan, we believe that the implementation of the policies needs to be credible, notably on issues like the location and impact of tall buildings or the promotion of distinctive local character. We note that the new Key Performance Indicators should support development that enhances heritage, as should the reference to funding for historic sites through CIL and S106. These are positive steps in our view.

We look forward to working with the GLA and other stakeholders across the heritage, planning and culture sectors to bring forward a heritage strategy which, as we have noted above, is the next step to supporting the delivery of heritage focused Good Growth.

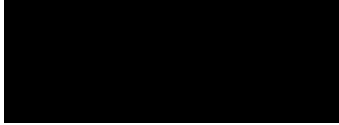
If you have any questions about our advice please contact David English (details below), or Katharine Fletcher (Katharine.Fletcher@HistoricEngland.org.uk / 020 7973 3771



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Finally, I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from this Plan and which may have adverse effects on the historic environment.

Yours sincerely,



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Appendix 1

Detailed comments on the draft London Plan and suggested wordings:

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
Chapter 1	Planning London's Future (Good Growth Policies)	
Para 1.0.3, p10	<p>Historic England welcomes the clarity in the Plan that links 'Good Growth' to sustainable development. This provides a helpful link to the National Planning Policy Framework (NPPF). However, it is essential to identify the role of the historic environment in achieving this.</p> <p>Para 7 of the NPPF sets out three dimensions for sustainable development to be delivered through the planning system - economic, social and environmental. The historic environment is identified within the environmental dimension, and is one of the core planning principles.</p> <p>To ensure the Plan provides the necessary clarity on considerations for sustainable development a clear reference is needed to para 7 of the NPPF in the opening chapter. Without this explanation there is ambiguity in the Plan as to whether the historic environment is a relevant consideration in a number of contexts. With clarification, phrases such as 'sustainable growth' (eg. para 1.0.7 and policy D2 B) in the Plan will be in line with the national planning policy approach which includes consideration of the 'natural, built and historic environment'.</p> <p>This clarity is also needed to remove ambiguity in the references to environmental considerations in the Plan.</p>	<p>So that the London Plan carries forward the historic environment as a key contributor to sustainable development in accordance with national policy we recommend as follows:</p> <ul style="list-style-type: none"> - Include a sentence stating that the Plan follows the definition of sustainable development for planning policy, as set out in para 7 of the NPPF. This could be added after para 1.0.3: <p><u>'This plan takes forward sustainable development in accordance with paragraph 7 of the National Planning Policy Framework'.</u></p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
1.0.7, p11	<p>We welcome the reference to Good Growth as ‘sustainable growth that works for everyone, using London’s strengths to overcome its weaknesses’. London’s historic environment is one of its key strengths contributing to the capital’s international image and distinctiveness, and the quality of life of Londoners. The Mayor’s statement in a ‘<i>A City for All Londoners</i>’ that he will do everything he can to protect the city’s heritage was strongly supported by Historic England, and we hope that the comments and recommendations here assist in carrying that forward. (Please note above recommendation for para 1.0.3 relating to clarifying the role of the historic environment in promoting sustainable development)</p>	
Good Growth Policies	<p>Historic England welcomes the concept of Good Growth. Our report ‘<i>Translating Good Growth for the Historic Environment</i>’ takes this forward and demonstrates how integrating heritage assets into development proposals gives a ‘special-ness’ that promotes distinctive developments that will also promote the jobs, housing and activities Londoners need. We welcome the reference in policy GG5, Part E, to the economic value of heritage, and the reference in Policy GG2 to London’s distinct and varied character.</p> <p>The Government’s ‘<i>Heritage Statement</i>’ (December 2017) serves to underline the value of heritage across economic, social and environmental agendas, based on research findings. It identifies that ‘heritage helps create great places to live, work, visit and do business’ as well as ‘contributing to our economy, our wellbeing and the regeneration of our communities’.</p>	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>The Heritage Statement refers to the social benefits of heritage ranging from increased social cohesion and greater sense of identity to improved wellbeing and better learning and skills outcomes. We would like to see this important contribution that heritage makes to local communities brought out within the Good Growth policy framework.</p>	
<p>Policy GG1 and para 1.1.4 Building Strong and Inclusive Communities, p12</p>	<p>As set out above, Historic England considers that the value of heritage to local communities should be recognised in the guiding Good Growth policies and text. This is something of a gap at present and addressing this would provide the foundation for later statements and policy (for instance, para 2.10.6).</p>	<p>We recommend the social contribution of heritage is reflected in policy GG1 and text, as follows:</p> <ul style="list-style-type: none"> - Amend policy GG1 Part E: ‘... reinforce or enhance the identity, legibility, permeability and inclusivity ...’. - Add to para 1.1.4: ‘... a range of workspace in accessible locations, built forms that work with local heritage and identity and social, physical ...’.
<p>Policy GG2 Making the best use of land, and supporting text, p14</p>	<p>We welcome the reference in part C to ‘... strengthening London’s distinct and varied character ...’. Part D refers to protection of open spaces and nature conservation sites. Protection should be afforded to heritage assets also.</p>	<p>Amend policy GG2, part C to read: ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character and protecting the significance of its heritage assets.</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
		Amend para 1.2.7 to read ‘...is why many people want to come to the city. <u>This heritage holds local and strategic significance for London, and Londoners, and it will be protected and enhanced.</u> As new developments are designed ...’.
Policy GG5, Growing a Good Economy, p20	We welcome Part F of the policy promoting London’s rich heritage and cultural assets...’. The benefits that heritage assets bring to London are multi-faceted, and we are pleased to see this recognised in para 1.4.9 referring to ‘... London’s rich cultural and historic assets, the quality of its streets and public places ...’.	
Chapter 2	Spatial Development Pattern	
Spatial Development policies	The scale of change proposed, particularly in the parts of London identified in this chapter, will call for highly effective management to deliver the aspirations in a sustainable way. The ‘step-change’ in delivery of growth requires a commensurate response, in policy and implementation, to conserving and enhancing London’s exceptional historic environment.	
Policy SD1 Opportunity Areas, p28	This policy requires amendment to provide specific protection to heritage assets within and surrounding the Opportunity Areas. This is necessary in view of the well-documented concerns of UNESCO and others regarding the harm from tall buildings in Opportunity Areas affecting the Outstanding Universal Value of London’s World Heritage Sites.	In order to integrate heritage considerations we recommend the following changes to policy SD1: - In SD1 A), add a new part: <u>‘9) ensure that existing features particularly valued by local communities</u>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>Policy SD1 should also reflect the emphasis on place-making elsewhere in the Plan that responds to valued character and heritage. Para 2.10.6 (p94) refers to this for areas for Strategic and Local Areas for Regeneration. These areas do not entirely coincide with the Opportunity Areas however, and so Policy SD1 needs to include a clause to ensure that successful new communities are created incorporating valued features.</p> <p>A further key concern is that the assumptions that have been made in defining the capacity of the Opportunity Areas are not clear. Flexibility should be built in where there are sensitive historic environments within the Opportunity Areas and their settings.</p>	<p><u>are identified and incorporated'</u></p> <ul style="list-style-type: none"> - In policy SD1 B), delete part 4 and substitute with: <u>'4) Plan for environmental enhancements, attractive and sustainable neighbourhoods which respect surrounding character and heritage assets'</u> - In policy SD1 B, part 6), to ensure flexibility regarding capacity with respect to heritage considerations, amend at the end to read: <u>'... capacity set out in Figures 2.4 and 2.12 subject to satisfying policies HC1 and HC2'</u>
<p>Policy SD1 supporting text, p30</p>	<p>Historic England considers that greater partnership working is needed in the planning of the Opportunity Areas. The Opportunity Area Planning Frameworks (OAPFs) have not, unfortunately, been effective in bringing forward sustainable development, as demonstrated by the impacts of development at Vauxhall Nine Elms and at Waterloo on surrounding heritage assets. While this is partly an implementation issue, it is also reflective of the quality of engagement. Looking at alternative options through OAPFs can provide the evidence needed for a local plan, without pre-empting the statutory process.</p>	<p>We recommend the following:</p> <ul style="list-style-type: none"> - Amend para 2.1.3, first sentence, to read: <u>'...their growth potential for Londoners'</u> - Amend para 2.1.4 to state: <u>'OAPFs will be used to engage a wide range of stakeholders, and to explore alternatives to inform the development plan process, including the Strategic Environmental Assessment, while avoiding pre-empting the statutory Development Plan for the area.'</u>

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	<p>Historic England would like to see reference to the need for characterisation studies to be carried out early, to identify and understand the heritage interest within and surrounding Opportunity Areas, and provide the basis for future planning. These should scope in all aspects of the historic environment, including archaeology.</p>	<p>A clear reference to early characterisation of Opportunity Areas should be included in the text, perhaps with a cross-reference to policy D2</p>
<p>Policy SD1 Opportunity Areas, supporting text Kingston, p37</p>	<ul style="list-style-type: none"> <p>Kingston new Opportunity Area, p37/38</p> <p>The absence of heritage references in paras 2.1.22 to 2.1.24 is very concerning given that the Opportunity Area (OA) is proposed to include the old town conservation area. This contrasts with other Opportunity Areas, such as Clapham Junction OA (para 2.1.26) and Wood Green/Haringey Heartlands OA which include references to place-making and heritage respectively. We welcome these references and wish to see consistency in the plan, with clear references included proportionate to the sensitivity of the heritage assets potentially affected. This is necessary to de-risk the future planning process.</p> 	<p>We recommend the following addition to para 2.1.22:</p> <p><u>‘Kingston town centre with its ancient market place is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks.’</u></p>
<p>Policy SD1 Opportunity Areas, supporting text Royal Docks p45</p>	<ul style="list-style-type: none"> <p>Royal Docks, 45/46</p> <p>Silo D represents a significant landmark and an opportunity for imaginative re-use.</p> 	<p>We recommend the following sentence is included in para 2.1.49:</p> <p><u>‘Silo D is a heritage asset at risk which provides opportunities for heritage and cultural led regeneration.’</u></p>

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<p>Policy SD1 Opportunity Areas, supporting text Old Oak Park Royal, p48</p>	<ul style="list-style-type: none"> • Old Oak / Park Royal Opportunity Area, p48/49 Old Oak Common represents an enormous opportunity for positive place-making, to which a clear reference is merited in the Plan. 	<p>Add to the end of para 2.1.57: <u>‘Positive masterplanning will be used to create an attractive new town centre with distinctive character.’</u></p>
<p>Policy SD1 Opportunity Areas, supporting text Great West Corridor and Fig 2.10, pp52</p>	<ul style="list-style-type: none"> • Great West Corridor, new Opportunity Area, p52 The lack of reference in the Elizabeth Line West corridor to the proposed new Opportunity Area in the Great West Corridor (GWC) is a cause for concern. This is not consistent with the coverage for other Opportunity Areas. The lack of a clear steer is a serious risk in the context of the highly sensitive heritage in the surrounding area. We note that there are already planning applications proposing developments with negative impacts on heritage assets, including the Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site. In order that the plan is consistent with policy HC2 (World Heritage Sites), a clear reference should be made in a new paragraph to this sensitivity. <p>Current assessment work for the GWC Local Plan indicates a much lower figure for both housing and employment capacity in the GWC. The IIA for the draft GWC Local Plan refers to harm to heritage assets at this lower level of development. We recommend therefore that the figures in the Plan for the GWC are fully assessed through views analysis, and at this stage that the capacity should not be stated in Figure 2.10</p>	<p>We recommend that a new paragraph is included on p53, as follows:</p> <p><u>‘The Great West Corridor is one of London’s key approaches and presents unique opportunities for place making. It inspired high quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London’s most significant historic landscapes, including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gardens Kew World Heritage Site. Master planning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area’s heritage should be fully explored.’</u></p>

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		<p>In view of the disparity in the capacity assessed for the GWC through the local plan process we recommend that the figures in Fig 2.10 are removed and a note is added to state <u>‘the capacity is being assessed.’</u></p>
<p>Policy SD1 Opportunity Areas, supporting text Euston, p53</p>	<ul style="list-style-type: none"> • Euston Opportunity Area, p53 <p>The text for Euston should reflect the heritage interest of the area.</p>	<p>We recommend para 2.1.66 is amended in the third sentence to read: ‘ ...world class transport interchange and new residential and business district <u>which draws on the area’s rich railway heritage</u>’</p>
<p>Policy SD4 The Central Activities Zone (CAZ), p66</p>	<p>We support the reference in Part C to sustaining and enhancing the heritage of the CAZ. We also note and welcome references in paras 2.4.4 and 2.4.7 recognising strategic elements – the River Thames, The Royal Parks, World Heritage Sites, designated views and the unique concentration of heritage assets in the CAZ. However, we feel greater emphasis in policy, and leadership from the Mayor is also called for to ensure these exceptional assets are protected for the future.</p> <p>We support para 2.4.9 and 2.4.13 references to heritage which demonstrate the strong connections between character, heritage and cultural activity.</p>	<p>Please refer to our comments relating to the Royal Parks and the River Thames in Chapters 7, 8 and 9.</p>
<p>Policy SD6 Town centres</p>	<p>We welcome the approach to town centres and the recognition that these are often historic centres. In particular we note:</p>	

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p78	<p>Part A 2) refers to ‘... intensification ... complementing local character and heritage assets’</p> <p>Part A 4) states town centres will be promoted and enhanced as ‘the main focus for Londoners’ sense of place and identity in the capital’</p> <p>Para 2.6.1 states ‘Many town centres in London are of historic interest and contain high concentrations of heritage assets’</p>	
Policy SD7 Town centre network, p81	<p>Historic England notes the potential challenge in accommodating growth in, and around, town centres. We do not offer comment on the indicative growth potential for individual centres referred to in Policy S7, part G 1) and in the Plan Annex 1, but expect the policy framework to be operated favourably to protect the heritage of these centres.</p>	
Policy SD8 Town centre Development Principles p86	<p>We support the following references:</p> <p>Part B, 4) criteria for assessing potential for intensification include</p> <p>h) potential to complement local character, existing heritage assets and improve the quality of the town centre environment</p> <p>5) c) redevelopment of other low density town centre buildings that are not of heritage value</p> <p>5) d) delivering residential on upper floors</p>	
Policy SD9 Town centres: Local partnerships and implementation p90	<p>We support the following helpful references:</p> <p>Part A Each town centre should have a town centre strategy produced in partnership</p> <p>Part C A partnership approach to bring sites forward for redevelopment</p> <p>Para 2.9.2 Town centre strategies should be tailored to each town centre, developed with stakeholders, including Historic England</p>	
Policy SD10	<p>We are pleased to note that part C refers to locally sensitive policies for</p>	

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Strategic and local areas for regeneration p92	<p>renewal of town centres.</p> <p>We welcome the supporting reference in the text in para 2.10.5 to enriching the qualities of an area that make it unique.</p> <p>Para 2.10.6 also makes a welcome statement recognising that regeneration areas are likely to have strong sense of place, local identity, and character, and that Local Plans, OAPFs and regeneration strategies should identify, protect and promote places and spaces that are valued by communities, including cultural venues, heritage assets</p>	
Chapter 3	Design	
Policy D1 London's form and characteristics p98	<p>Historic England supports this policy. The following aspects are particularly welcome:</p> <ul style="list-style-type: none"> - Part A 3) stating the form and layout of a place 'should be street-based' - Part B 1) and 4) requiring development to respond to local context, scale, identity and character of a locality and respect, enhance and utilise heritage assets and architectural features that make up local character. This aligns with paras 58 to 61 of the NPPF. The policy should be viewed as going hand in hand with the requirement to conserve the historic environment in policy HC1. <p>Supporting paragraph 3.1.2 is also helpful in stating that developments showing a clear understanding of, and relationship with, the context of the site are more likely to be successful.</p> <p>We consider strengthening of the policy is nevertheless needed, in part</p>	<p>We suggest Part A includes a further criterion: <u>'11) be based on an understanding of the heritage interest of the area, including its historic grain and archaeological interest.'</u></p> <p>There is an opportunity here to provide a strategic steer as to different building typologies that could be considered as alternative forms to tall buildings. (See later comments on policy D8)</p>

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	<p>A, to reflect the need for heritage considerations to be built into the master planning of schemes, informing and influencing the layout of developments for the better. For instance, the location of green space in areas of archaeological sensitivity can assist in preserving remains, and reinstating lost street patterns can restore coherence and historic legibility. For example the restoration of the medieval street within the Bloomberg building in the City – which had been obliterated by the earlier redevelopment – adds interest, celebrates London’s heritage and re-connects the street pattern. The amendment we propose would be consistent with later para 7.1.6 which helpfully highlights historic patterns and features as considerations in designing development layouts.</p>	
<p>Policy D2 Delivering good design, p102</p>	<p>Historic England supports this policy, with a minor change, for clarity. We particularly welcome:</p> <ul style="list-style-type: none"> - Part A stating that an area’s capacity for growth should be identified and delivered in a way that strengthens what is valued about a place, including evaluation of <ul style="list-style-type: none"> 3) urban form, structure, townscape, grain, heights ... 7) historical evolution and heritage assets, including assessment of their significance and contribution to local character ... <p>Historic England supports the use of 3-D modelling and welcomes part C advocating the use of this developing technology. We strongly support para 3.2.4 referring to the use of digital modelling in the plan-making process, as this will promote a plan-led approach. We suggest this is included in part C as a minor change, to reflect this positive opportunity.</p>	<p>We recommend the following changes:</p> <ul style="list-style-type: none"> - In part C, amend to read: ‘These models, particularly in 3-D virtual reality and other interactive digital models should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process’ - In part F, amend to read ‘...in addition to the borough’s planning, urban design and conservation officers’ assessment ...’ - In para 3.2.7 supporting text, amend to read: ‘...review by qualified urban

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	<p>The important role of borough conservation officers in assessing schemes should be recognised in part F, and the supporting text.</p> <p>We note part F 2) refers to a height of 30m as a potential definition of tall buildings where boroughs have not adopted a local definition. Please see our comments in relation to policy D8. It is likely that boroughs will need to consider what is tall in a number of different contexts in their areas.</p> <p>We support the statement in para 3.2.9 requiring assessment of design elements, such as landscaping and building facades, to be part of assessing the whole development and not deferred for consideration after planning permission has been granted.</p>	<p>design and conservation officers as well as formal design review’.</p>
Policy D3 Inclusive design, p106	<p>Historic England supports the promotion of easy access to historic buildings so that that as many people as possible can enjoy these assets. We welcome the references in paras 3.3.6 and 3.3.7 to consideration of heritage value in promoting access.</p>	
Policy D6 Optimising housing density, p117	<p>While we support a design-led approach there is potential for this to be supported by a density matrix to provide a steer, and to provide clarity for development management.</p>	
Policy D7 Public Realm, p122	<p>We welcome the requirement in Part A for consideration of how the public realm relates to local and historic context.</p>	
Policy D8	<p>While there are aspects of this policy we strongly support, in particular</p>	<p>We encourage a change in approach to</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
<p>Tall Buildings p126</p>	<p>part C d) and e), and the plan-led (including master planning) approach, we have reservations too.</p> <p>Overall, we consider that there is a need for better balance in the Plan in terms of the approach to tall buildings, and that the Plan should be more positive in promoting other forms of development. At present there appears to be an inconsistency in terms of the welcome aspirations for street-based developments, place-making that relates well to local context, and medium-rise typologies promoted in the Mayor’s Housing Strategy – and the positive slant to tall buildings in the Plan. This is evident in the introductory paragraph to policy D8, in itself an anomaly in comparison to the format of policies across the Plan. It is often harder to deliver good places that work for local communities using tall buildings.</p> <p>We note, in particular, the experience of the impact of tall buildings in Opportunity Areas, for instance in Vauxhall, Waterloo and London Bridge/ Bankside on heritage assets. These have led to conflicts with the UK’s duty under the World Heritage Convention, and international scrutiny, resulting in the risk of both Westminster WHS and Tower of London World Heritage Sites being placed on the ‘in danger’ list. We consider it is important that the Plan is consistent in promoting approaches that actively avoid recurrence of such conflicts.</p> <p>In part A, we support the statement that development plans should define what is considered tall. Historic England considers that boroughs</p>	<p>include the following:</p> <ul style="list-style-type: none"> - Redress the inference in D8 that over-emphasises the tall building typology in the context of the drive for intensification - Consider clarification regarding defining areas for tall buildings, and the required work entailed in justifying them - Refer to the Mayor taking a clearer role where tall buildings affect more than one borough - Amend the policy to provide a more positive approach to the value of the openness and qualities of the Thames corridor - Refer specifically to characterisation within this policy - Consider reframing para 3.8.2 to recognise that the ‘evolving context’ should be one that has reconciled future character with existing valued elements. <p>See also our recommendations under policy SI14 and SD1</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>will need to identify different heights depending on the varied character of different areas. We suggest that this is clarified and that the policy refers to the need for characterisation to inform building heights.</p> <p>In relation to parts A and B, it is unclear whether all boroughs are required to identify areas for tall buildings, or if this is a choice made in the context of local character and other considerations.</p> <p>Part B is helpful in promoting a plan-led approach. However, we ask for clarity in terms of the up-front work needed to justify the locations of tall buildings in the first place. There is a potential danger that large areas could be identified with little supporting evidence to justify them.</p> <p>We strongly support parts C d) and e).</p> <p>In part C f), while we strongly support the need to address the Thames, there should be a higher bar set in terms of protection of the open quality of the River corridor. At present the wording of part C f) is based on mitigating harm rather than protection and enhancement of its essential qualities. Reading across the Plan this issue requires addressing in a much clearer way. The Plan could engage positively with the openness of the landscape, the unique aspects that it affords, and the opportunities these provide for a positive image of London. This is an issue on which we feel the Mayor's leadership is especially needed. The Thames Landscape Strategies have not been actively promoted in recent years, and one has never been produced for the section of the Thames</p>	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>between Chelsea and Tower Bridge. Historic England has had long-standing engagement with this issue and would be pleased to support the GLA in taking a proactive approach to one of London's most important strategic assets.</p>	
<p>Policy D9 Basement Development para 3.9.5, p131</p>	<p>We welcome reference to archaeology and heritage in relation to basement developments.</p>	
<p>Chapter 4</p>	<p>Housing</p>	
<p>Policy H2 Small sites, Parts E, F, and para 4.2.7, p153 to 155</p>	<p>Historic England objects to the current wording 'unacceptable level of harm' in Part E, which suggests that there would be an acceptable level of harm with regard to designated heritage assets. Having a statement in policy where it is clear that an acceptable (yet undefined) level of harm is expected is in conflict with the NPPF, which sets out that heritage assets are an irreplaceable resource with any harm or loss requiring clear and convincing justification.</p> <p>Furthermore, and more specifically in relation to conservation areas, we consider that the proposed wording would be contrary to the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. This requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.' If applications cause some harm to heritage, they will not preserve or enhance the special character of the conservation area where the development is proposed.</p>	<p>We recommend the following change:</p> <p>Part E: '... the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, undesignated heritage assets ...'</p> <p>In tandem with the above change to Part E, we recommend Part F is modified to ensure compliance with national heritage policy and legislation, as follows:</p> <p>Part F: 'The presumption in favour of small housing developments should not be applied</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>Our recommended wording, which should be read in conjunction with our other recommended changes to H2 below, proposes to change the reference in Part E, to refer to undesignated heritage assets, as opposed to designated heritage assets. This avoids introducing policy tests that conflict with national heritage policy and legislation, while offering a hook to ensure proportionate consideration of potential impacts on archaeology and locally designated assets. For archaeology, this highlights the need to establish the importance of remains early, especially where they may be as significant as a nationally designated heritage asset.</p> <p>Following on from the above point, we consider it necessary that Part F of the policy excludes designated heritage assets and their settings.</p> <p>Although it is welcome that listed buildings are presently excluded, this is not sufficient to comply with the statutory duty which refers to listed buildings <u>and their settings</u> (s16/66 Planning Listed Buildings and Conservation Areas Act 1990) ('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'). Further, there is no acknowledgement that there is a statutory requirement when dealing with conservation areas (s72 of the Planning Listed Buildings and Conservation Areas Act 1990) ('special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area').</p>	<p>to:</p> <ol style="list-style-type: none"> 1) <u>designated heritage assets and their settings</u> 2) developments...' <p>To support the above changes we recommend the existing para 4.2.7 is deleted and substituted with:</p> <p><u>'Although not covered by the presumption in favour of small sites, boroughs are encouraged to explore opportunities for small housing developments in conservation areas where it will complement and enhance the area. As not all elements of a conservation area will necessarily contribute to its significance there is the potential for well-designed new housing to make a positive contribution to the special character in some conservation areas. This also applies to small sites in the setting of other heritage assets such as listed buildings and World Heritage Sites. The use of design codes, taking account of conservation area character appraisals, management plans</u></p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>The NPPF identifies listed buildings and conservation areas in the definition of designated heritage assets. We recommend that reference is made to all designated heritage assets and their settings in Part F, thereby also ensuring that proposals in the setting of World Heritage Sites are also encompassed.</p> <p>As a linked amendment to those proposed above for policy H2, parts E and F, we propose an amended paragraph 4.2 7 in the supporting text. This paragraph now seeks to be heritage positive. It encourages boroughs to be pro-active in how they approach change on sites within conservation areas, specifically how they think about new housing development helping to enhance special character.</p>	<p><u>and other designation information (see HC1) will be important.'</u></p>
Chapter 5	Social infrastructure	
Policy S1 Developing London's social infrastructure, p202	<p>Historic social infrastructure in London includes hospitals, schools, places of worship, libraries, fire stations, swimming pools and many other civic and institutional buildings. Many have been adapted or re-purposed for other community use. As key buildings, often designed to convey their purpose, they have particular resonance and are especially supportive of local identity and civic pride. Many are key landmark buildings too, demonstrating that community landmarks do not need to be tall to provide a valued focus for the local community.</p> <p>Our report '<i>Risky business?</i>' highlights examples of successful adaptation and re-use of historic social infrastructure, for instance, the repair and</p>	<p>See our comments on GG1 and the need to recognise the close and reinforcing relationship between heritage and community identity.</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>extension of Poplar Baths (listed grade II), and the regeneration of Wilton’s Music Hall (listed grade II*) for cultural and community use. Other examples include community re-use of London’s fire stations, such as at Hornsey and West Norwood.</p> <p>Historic England is pleased that the Plan promotes the re-use of social infrastructure where it is redundant for its original use (policy S1, part G). As London’s population grows there may be beneficial effects for many un- or under-used historic buildings in line with policy HC1, part E.</p> <p>Shared use can also be highly beneficial as outlined in the Plan in para 5.1.8, which we welcome. An excellent example is the dual use of St Mary Aldermary in the City where the church nave doubles as a weekday cafe, providing a magnificent social space in which to relax, meet friends and enjoy the Wren church.</p>	
<p>Policy S4, Play and informal recreation, p212</p>	<p>Play areas, if poorly designed, can have an impact on the character and visual amenity of historic landscapes and other open spaces, adding clutter in the form of brightly coloured equipment, fencing, gates, CCTV etc.</p> <p>This is most evident in smaller open spaces. Options have improved in recent years and we suggest that reference to the need for good design is made in the supporting text.</p>	<p>We suggest that para 5.4.6 includes a reference to the need for good design in the provision of play areas.</p>
<p>Policy S7 Burial space, p219</p>	<p>It is unclear whether the policy applies only to cemeteries still in use. The need to consider any historic and archaeological interest in relation to proposed clearance or re-use should be highlighted, including the need</p>	<p>In policy S7, amend part A to read: ‘Cemeteries should be protected and re-use of burial space supported where</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>to accord with national guidance on best practice.</p> <p>This policy is designed to address burial space. However, we note that historic burial grounds are heritage assets. In our view, their protection and management should be promoted through the Plan. The Plan should recognise the rich heritage that London’s burial grounds represent and refer to the Magnificent Seven cemeteries specifically. These are the Victorian cemeteries of Kensal Green, West Norwood, Highgate, Abney Park, Nunhead, Brompton and Tower Hamlets. More could be made of the value of protecting and enhancing these for educational, leisure and tourism.</p>	<p><u>appropriate, taking account of any historic or archaeological interest, and national best practice’</u></p> <p>We recommend an additional paragraph after para 5.7.5:</p> <p><u>‘London’s historic burial grounds, either associated with places of worship or as cemeteries, contain many heritage assets and these should be positively protected and managed. The ‘Magnificent Seven’ Victorian cemeteries are part of London’s strategic social infrastructure, and are increasingly recognised for their educational, leisure, landscape and historic value.’</u></p>
Chapter 6	Economy	
	<p>The historic environment makes a major contribution to London’s economy in many ways, including the contribution it makes to the positive image of London and the quality of life its historic places and neighbourhoods bring. These aspects are touched on in policy GG5 and para 1.4.9 which we welcome. The Government’s recent <i>Heritage Statement</i> recognises this broad contribution, which is also well evidenced in Historic England’s Heritage Counts publications on</p>	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p><i>Heritage and the Economy 2017.</i></p> <p>The broad numerical evidence is exemplified through case studies from around London in our publication <i>Translating Good Growth for the Historic Environment</i>.</p>	
<p>Policy E10 Visitor infrastructure, p261 and supporting text</p>	<p>This policy directly links to Good Growth policy GG5. Although principally about the infrastructure supporting London’s visitor economy, the policy would benefit from a direct reference, in part B, to London’s heritage.</p> <p>We support the principle in para 6.10.1 of promoting tourism more widely across London. It will be important to consider how the diversity of London’s heritage assets can assist with this.</p>	<p>We recommend part B is amended to: ‘The special characteristics of major clusters of visitor attractions, and the diversity of cultural and heritage assets across London should be conserved, enhanced and promoted.</p> <p>Please refer to our related comments on policies S7, HC2 and SI14.</p>
<p>Chapter 7</p>	<p>Heritage and Culture</p>	
	<p>Historic England warmly welcomes this chapter and the prominence it gives to the complementary relationship between London’s heritage and its cultural offer as a world city.</p> <p>We strongly support the heritage and culture policies with only a very few recommendations for amendment to ensure consistency reading across the Plan, and to strengthen links with the wider Plan objectives. Historic England has been pleased to work with GLA officers in producing the Maps which illustrate this chapter so well and illuminate the richness of London’s historic environment.</p>	<p>We recommend that the strategic significance of London’s historic landscapes and the River Thames is identified in this chapter.</p> <p>(See our comments on Chapter 8, policy G1, and Chapter 9, policy SI14)</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>As a general point, we consider that the strategic significance of London’s Royal Parks and historic landscapes is not readily apparent in this chapter. Similarly, the historic significance of the River Thames as a strategic asset proving the setting for many of London’s most significant.</p>	
<p>Policy HC1 Heritage Conservation and Growth, p268</p>	<p>Policy HC1 is strongly supported.</p> <p>It could be beneficial to introduce an opening sentence to the policy to set the purpose of the policy, and to make the link to the Good Growth policies.</p> <p>We warmly welcome the platform provided by the opening rubric to identify, understand, conserve and enhance the historic environment.</p> <p>Historic England also warmly welcomes part E to policy HC1 which promotes a proactive approach to heritage assets at risk so that their future maybe secured for this, and future generations of Londoners.</p>	<p>See our comments on the Good Growth policies where we have recommended strengthening to reflect the strategic importance of heritage to London.</p> <p>We welcome the reference in para 7.1.1 which assists in joining up this policy with the Plan’s wider objectives under the Good Growth policies.</p>
<p>Policy HC1 supporting text</p>	<p>As set out in our covering letter, we would like to see a reference in the Plan to the Mayor bringing forward a Heritage Strategy. This would be to support conservation of London’s heritage and the delivery of heritage-led growth.</p> <p>In para 7.1.3 we suggest reference to ‘the highest standards of architecture’ would suffice, given the potentially long life of the Plan. ‘Modern’ could also be confused with ‘modernist’.</p> <p>In para 7.1.5 it would be appropriate to recognise the role of amenity societies amongst the stakeholders named in the final sentence.</p>	<p>We recommend that a sentence is added to the end of para 7.1.1, as follows: ‘... and their effective management is a fundamental component of achieving good growth. <u>The Mayor will bring forward a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital’s heritage and the delivery of heritage-led growth.</u>’</p> <p>We suggest the following minor changes:</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>We support the reference in para 7.1.6 to urban renewal offering opportunities for creative re-use of heritage assets and the historic environment as well as enhancement, repair and beneficial re-use of heritage assets at risk. We also welcome 7.1.7 covering cases of deliberate neglect.</p> <p>In para 7.1.7, for clarity, it would be suitable align the reference to significance more closely to the NPPF.</p>	<ul style="list-style-type: none"> - in para 7.1.3 refer to ‘... the highest standards of architecture ...’ - in para 7.1.5 amend to read ‘... as well as local communities and amenity societies’ <p>Lastly, we recommend amendment of the first sentence of para 7.17: ‘Heritage significance is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset’s visual attributes, such as - form, materials, architectural detail, design and setting, as well as through historic associations and, where relevant ...’</p>
Figure 7.1 p270	Minor correction to the key: The full title of Westminster World Heritage Site is The Palace of Westminster, Westminster Abbey and St. Margaret’s Church. For the map, we suggest just ‘Westminster’.	Amend the key to: ‘... Royal Botanic Gardens, Kew; Westminster ; Tower of London; and Maritime Greenwich’
Figure 7.4 Character Map	Twice in the key ‘suburbs’ is spelt ‘surburbs’ Correct capitalisation and insert ‘Former’ for medieval market towns	Amend the spelling of ‘suburbs’ S quare M ile F ormer medieval market towns
Policy HC2 World Heritage Sites, p278	Historic England strongly supports this important policy. It provides a more robust approach to protection of the Outstanding Universal Value (OUV) of London’s four World Heritage Sites, and reflects	Please note our comments and recommendations in relation to policy SD1 and the Opportunity Areas where

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>recommendations in the ICOMOS/ICCROM report following the Reactive Monitoring Mission to Westminster in February 2017. This report provides an important part of the evidence base for the new London Plan.</p> <p>Historic England wishes to see this stronger approach applied to the Opportunity Area policies and OAPFs, existing and forthcoming, where there are potential impacts on the settings of World Heritage Sites.</p>	<p>development in these has potential to harm the Outstanding Universal Value of World Heritage Sites.</p>
<p>Policy HC2 supporting text</p>	<p>In para 7.21, for clarity, we recommend that the GLA is identified at the end of paragraph.</p> <p>In para 7.2.3, second sentence, we suggest a minor change to recognise that change may also be neutral.</p> <p>We welcome the reference to 3-D modelling in para 7.2.3 and to Historic England being represented on World Heritage Site Steering Groups in para 7.2.5.</p>	<p>We recommend minor changes:</p> <ul style="list-style-type: none"> - in para 7.21, amend to read ‘This duty is transferred to local authorities, including the GLA’ - in para 7.2.3, amend the second sentence to read ‘Changes to the setting can have an adverse, neutral or beneficial impact on the ability ...’
<p>Policy HC3, Strategic and Local Views, pp280</p>	<p>Historic England strongly supports policy HC3. Recent developments within the strategic views make a review of the Mayor’s London View Management Framework SPG timely. Historic England is keen to engage with the review.</p> <p>We welcome the recognition in HC3 part G, and para 7.3.6 of the supporting text, of the potential importance that should be attached to local views. We also welcome the reference to the importance of cross-collaboration between neighbouring authorities. In some circumstances</p>	<p>In relation to cross-boundary views, please see our comments on policy D8.</p> <p>It may be helpful if the Mayor takes a clearer role where views affect more than one borough.</p> <p>The policy should encourage boroughs to maintain and enhance viewing corridors</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	<p>we consider it would be beneficial for the Mayor’s office actively engage.</p> <p>Consideration should be given to enhancement. Where buildings currently detract or block the view the corridor should be maintained. Overtime this can allow the viewing corridor to be enhanced through redevelopment.</p>	<p>beyond blocking or detracting features to allow for potential long-term enhancement.</p>
<p>Policy HC4 London View Management Framework, p285</p>	<p>Recent developments within strategic views have, in some cases, severely compromised the view. The pressure on the strategic views appears to be increasing in terms of planning applications being made. To ensure the views are appropriately safeguarded we consider that part B should be much firmer.</p> <p>We recommend that the words ‘overly intrusive’ in part B are amended to omit the qualification ‘overly’, which currently sets a standard whereby intrusive development is accepted. This change would not rule out development being visible, only that it should not be intrusive.</p>	<p>We recommend part B is changed to read: ‘Development in the foreground and middle ground of a designated view should not be intrusive, unsightly or prominent to the detriment of the view’</p>
<p>Policy HC5 Supporting London’s culture and creative industries, p287</p>	<p>In part A5) It would be appropriate to refer to making use of existing historic cultural assets: for instance, redundant churches or cinemas.</p> <p>It is often heritage buildings and historic uses which provide the character to town centres and ex-industrial areas boosting their potential for successful regeneration. Policy HC5 part C could make this link to highlight the complementary nature of heritage and cultural activity.</p>	<p>We recommend:</p> <ul style="list-style-type: none"> - in part A5), amend as follows: ‘... and spaces for outdoor cultural events and make use of existing historic cultural assets’ - in part C4) amend to ‘ encourage the temporary use of vacant buildings and sites for creative workspace and

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
		activities, <u>including the beneficial re-use of heritage assets</u>
Policy HC7 Protecting public houses, p297	We strongly support policy HC7 and the good references to the heritage of public houses. The text in para 7.7.3 would benefit from a minor change to note that it is not just architecture, but interior fittings and layout, that are often important to the interest and significance of the building.	Amend the second sentence of para 7.7.3 to read: ‘This is often derived from their architecture, <u>their interior fittings</u> , their long-standing use ...’
Chapter 8	Green Infrastructure and Natural Environment	
	<p>London’s historic landscapes range from its expansive Royal Parks and the registered landscapes associated with grand estates, to an unparalleled network of garden squares and locally designed parks, many with historic features and structures, and the ‘Magnificent Seven’ Victorian cemeteries. London’s parks also provide ‘reserve’ areas in which archaeological remains are well preserved.</p> <p>The significance of London’s parks should be protected in a consistent manner in the London Plan policies. We welcome the references in HC1 part A and Figure 7.3. However, the significance of these green spaces is not yet consistently reflected between chapters 7 and 8. Within Chapter 8, we welcome the reference in policy G3 to historic features and landscapes, but this is equally applicable to policy G1.</p> <p>The contribution of the historic environment has long been recognised as contributing to the multi-functional offer of green infrastructure. In many cases heritage is a strong factor in drawing people to these open spaces and, in doing so, promotes the health and well-being of</p>	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
	Londoners.	
Policy G1 Infrastructure p302	<p>In order to reflect the importance of heritage and landscape appropriately we recommend that policy hooks are introduced into policy G1 and supporting text. This is to provide necessary clarity, and to ensure that green infrastructure strategies promoted in part B take forward, and integrate consideration of heritage significance within green space.</p> <p>Although not mentioned in this chapter, we note that the concept of London as a National Park City is mentioned in the Mayor’s draft Environment Strategy and in para 1.2.6 of the Plan. Historic England has responded positively to the proposal and highlighted that this should embrace London’s cultural heritage, mirroring the remit of the UK’s other national parks.</p>	<p>We recommend:</p> <ul style="list-style-type: none"> - Amend policy G1, part B to read ‘ ... open space provision, biodiversity, landscape and heritage conservation, flood management, health and well-being ...’ - Amend para 8.1.1 to read: ‘...conserving and enhancing biodiversity, landscape and heritage interest, and promoting ecological resilience alongside more traditional ...’ <p>If the concept of London as a National Park City is included in a further iteration of the Plan, this should embrace London’s cultural heritage, to reflect the purpose of National Parks in the UK.</p>
Policy G4 supporting text, p306	<p>An addition to the supporting text to policy G4 would assist in providing clarity as to the importance of the historic environment to London’s open spaces.</p>	<p>Amend para 8.4. to read: ‘ ...habitat creation, enhancement of historic designs or features, landscaping improvement or flood storage.’</p>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
Policy G9 and Figure 8.1, p316	We note the overlap between archaeology and geodiversity	We suggest the following addition to the supporting text: <u>‘Prehistoric archaeological remains and associated flora and fauna can be found within geological deposits of the Quaternary Period which can therefore hold archaeological interest.’</u>
Chapter 9	Sustainable Infrastructure	
Policy SI10 Aggregates, p356	Minerals extraction generally has a high archaeological impact. We recommend the policy refers to assessment and mitigation of these impacts.	Amend part D to refer to the need for assessment and mitigation of any impacts on archaeology.
Policy SI14 Waterways, pp363	The Thames is the defining element of the setting of some of London’s most important heritage sites. The policy should be amended to convey this strategic importance. Historic England sees a role for the Mayor in promoting the cultural value of the River, as well as its heritage and natural values. There is a clear need for closer engagement with Thames Policy Areas especially in the central London reach of the River between Chelsea and Tower Bridge, which does not have a Thames Strategy.	We recommend the following changes: - SI14: include an introductory line in the policy box – taken from para 9.14.4: <u>‘The River Thames is a strategically-important and iconic feature of London. Its character changes on its way through London.’</u> - Change para 9.14.2 of the supporting text: <u>‘London’s waterways are a defining element of the setting of some of London’s most important heritage sites.’</u>

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
		<p>Furthermore we encourage a change in emphasis in para 9.14.4 to:</p> <ul style="list-style-type: none"> - <u>‘The Mayor will support the promotion of the River Thames as a focal point for London’s identity; incorporating its heritage, natural and landscape values and cultural opportunities.’</u>
Policy SI14, supporting text, Para 9.14.8, p367	The extent of the area to which the proposed removal of the designation of Metropolitan Open Land applies is unclear. If this applies to the Thames Policy Area, shown in Figure 9.7 (p366), it would remove a level of protection from significant historic landscapes, including Greenwich Park and the Royal Botanic Gardens, Kew.	Clarity is required on this issue to ensure no diminution of protection for the historic landscapes of the Thames.
Policy SI16 Waterways- use and enjoyment, text, p373	We welcome the references to promoting enjoyment of London’s waterways. The opportunity to celebrate the highly significant heritage assets lining the Thames through a co-ordinated lighting strategy would be appropriate to mention here.	We recommend the following addition to para 9.16.5: ‘... this should be encouraged. <u>A co-ordinated lighting strategy for the heritage assets lining the Thames is planned to enable wider appreciation of these assets.’</u>
Policy SI17 Protecting London’s Waterways, p373	We welcome the recognition of the heritage value of London’s waterways in this policy.	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
Chapter 10	Transport	
Policy T2 Healthy Streets, p403	<p>The integration of historic assets into improved infrastructure and public realm can greatly contribute to creating characterful places. London’s historic buildings and places provide the distinctive environments in which people wish to spend time, and provide the inspiration for place-making, including public realm enhancement schemes.</p> <p>Historic England is encouraged to see many good examples of this, from the smaller scale regeneration of Deptford Station yard, utilising a listed structure as a centre piece for a new public space, to the public realm enhancement of Kingston Market Place, drawing people in to enjoy this special place. At a larger scale, the major transformation at Kings Cross demonstrates excellence in the design of a new public realm which responds to, and makes the most of historic structures and waterways, providing for new views of the historic townscape. (See <i>Translating Good Growth for London’s Historic Environment</i> for these, and other, examples).</p>	<p>We recommend the following addition to the end of para 10.2.4: <u>‘Opportunities to enhance the experience of London’s streets by drawing inspiration from, and complementing, historic townscape and features should be promoted’</u></p> <p>Historic England further recommends that the Healthy Streets indicators specifically reference historic streets and places as positive factors promoting an attractive public realm, supporting measures to increase walking and cycling. This is a key recommendation in our response to the Mayor’s draft Transport Strategy.</p>
Chapter 11	Funding the London Plan	
Funding the London Plan	We welcome the statement in para 11.1.57 encouraging investment to be raised through the Community Infrastructure Levy and s106 contributions for cultural infrastructure.	
Chapter 12	Monitoring	
Table 12.1, Key Performance Indicators, p459	We warmly welcome the Key Performance Indicator for heritage which will support positive delivery in relation to heritage protection. Historic England is looking to adopt a similar monitoring measure.	
London Plan	Glossary	

London Plan Policy/ Para	Detailed comments on policies and text	Recommendations for changes
Annex 3		
Sustainable Development	Amend the definition of sustainable development to reflect how it is taken forward in the planning process	<p>Amend the definition of sustainable development to refer to that set out in para 7 of the NPPF:</p> <p><u>‘There are three dimensions to sustainable development: economic, social and environmental.</u></p> <ul style="list-style-type: none"> - <u>The economic role means contributing to a strong, responsive and competitive economy</u> - <u>The social role means supporting strong, vibrant and healthy communities</u> - <u>The environmental role means contributing to protecting and enhancing our natural, built and historic environment</u> <p><u>To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system’</u></p>
Outstanding Universal Value	The definition of Outstanding Universal Value should be reviewed to ensure it is suitably comprehensive and precise. Historic England can assist with this.	



THE TASTY CORNER
CAFE & TAKEAWAY

THE TASTY CORNER
CAFE & TAKEAWAY

CHESTNUT STREET W1



Appendix 2

Historic England's response to the Integrated Impact Assessment (November 2017) for the draft London Plan

General Comments

The Integrated Impact Assessment incorporates Strategic Environmental Assessment (SEA). The purpose of the SEA process is to test the London Plan as a whole, and in its constituent objectives and policies, against defined environmental topics, to identify significant effects. Cultural heritage (including architectural and archaeological heritage) is among the environmental topics that are required to be considered. Historic England's detailed comments on the assessment are set out in the table below.

Our conclusion, having considered the report, is that the IIA does not give sufficient weight to the London's exceptional heritage and that the historic environment is under-represented as a consideration. Although there is good coverage in places, there are gaps which should be addressed to ensure a robust assessment. In addition to our detailed comments, we request consideration of the relevant reports and information, some of it very recent, set out below. These should be used as a resource to interpret and expand the baseline evidence for London's historic environment (p132 onwards) which is, at present, over-reliant on designations, and requires greater content on trends and challenges affecting the historic environment. We hope that these reports will be of assistance in informing judgements in the next iteration of the IIA.

Chapter 4 of the IIA sets out relevant plans, programmes, strategies and objectives.

We note that the plans, programmes and relevant reports that should be drawn on require updating, and their contents used to inform the next iteration of the IIA. We recommend that the following are highlighted and assessed:

At national level, the IIA should take account of the *Heritage Statement 2017*, published in December by the Department for Digital, Culture, Media and Sport. This identifies the economic, social and environmental benefits of the heritage based on research findings. The social benefits of heritage range from increased social cohesion and a greater sense of identity to improved wellbeing. The Heritage Statement makes a clear link to the Government's *25 year Environment Plan*, published in January, in which the historic environment is also well integrated.

Historic Environment Good Practice Advice in Planning Note 3: *The Setting of Heritage Assets* (revised December 2017), and

Historic England Advice Note 4: *Tall Buildings*, December 2015 are both highly relevant to the IIA.

In February 2017 a Joint ICOMOS/ICCROM Mission visited to assess threats to Westminster World Heritage Site. The subsequent report (June 2017) made some clear recommendations for improved management of the World Heritage Site, including a recommendation for a stronger strategic planning framework for London's World Heritage Sites, and stronger strategic leadership. The report (available [here](#)) is an important part of the evidence base for the new London Plan, and a key document to integrate into the IIA.

Reports prepared to inform the London Plan:

Historic England has published a number of reports and studies to inform the London Plan process. We would like the IIA to highlight and integrate the following reports, all of which are available [here](#). We are delighted to see that two of these are included in the evidence base for the London Plan on the GLA's website.

1. *Keep it London: Putting heritage at the heart of London's future*, Historic England, December 2016 – identifies key priorities for the next London Plan. These include the need to integrate heritage from the outset, and to bring forward a Heritage Strategy for London
2. *Characterisation of London's Historic Environment*, Land Use Consultants, August 2016 - looks at how the historic environment is being assessed in London and how such data influences planning processes
3. *London's Local Character and Density*, Allies and Morrison, September 2016 - explores the different character types that make London distinctive and the potential for a better policy framework to steer contextually appropriate growth
4. *London Plan Archaeology Topic Paper: Delivering better, faster and focused public benefits*, Historic England/ALGAO, March 2017 – identifies the advantages to building in archaeological assessment from and the earliest stage
5. *Translating Good Growth for the Historic Environment*, Historic England, April 2017 – demonstrates how the historic environment contributes to, and is an inspiration for, Good Growth and provides a selection of case studies
6. *Risky Business? – Investing in Heritage at Risk*, Lichfields, January 2018 – identifies the social, economic and environmental benefits of investing in heritage assets at risk, including in the most deprived wards of London.

Historic England is continuing to work with the Mayor's office to scope the nature of a Heritage Strategy for London, to inform the delivery of the London Plan.

Mayoral Strategies

Historic England has provided responses to the Mayor's draft strategies for Transport, Environment, Housing and Health Inequalities. All of these are available [here](#). Since the strategies are prepared with a view to influencing the content of the London Plan, to assist, we provide a summary below of some of the key points where we requested strengthening, to ensure that the historic environment appropriately reflected.

Draft Transport Strategy:

Historic England considers the historic environment and local character play a positive role in promoting Good Growth and wellbeing, through their contribution to attractive and stimulating public places. An effective way of securing these benefits in a joined-up way is through inclusion in the healthy street indicators. With this in mind we have recommended that the historic environment is included in the 'healthy street indicators'.

We have recommended that transport led opportunities to "maximise" the delivery of high density development should read "optimise" to better reflect the need to integrate development with local character and take into account the setting of heritage assets.

We have also emphasised the need for any proposed development to be based on a sound understanding of the historic environment and local character. This will ensure that proposals are consistent with national policy by taking 'opportunities to draw on the contribution made by the historic environment to the character of place'.

Draft Environment Strategy:

The draft strategy addresses the natural environment. Our response advocates a broader definition of the environment that encompasses the historic dimension of London's environment. We highlight the need to address the qualitative values of green space, including London's Royal Parks, local parks and garden squares. The relationship between historic parks and buildings is key to the experience of London's landscape and townscape. We note that the designation of London as a National Park City should embrace cultural heritage, to align with the defined remit of other UK National Parks.

We underline the opportunities for adaptation of historic buildings for greater energy efficiency through tailored approaches to heritage interest.

Draft Housing Strategy:

Historic England acknowledges the need to address the current housing crisis in London. We welcome the objectives in the strategy for achieving high quality design in new housing, inclusive development and greater partnership working. We particularly welcome the new emphasis on increasing density through medium-rise, rather than tall,

buildings and the Mayor's commitment to Design Review. This change in approach supports good place making and, potentially, strengthened community identity.

Our response promotes ways to integrate consideration of the historic environment in initiatives to bring forward small sites and developments in town centres. We consider that exemplar developments can help lead the way, and draw attention to our report *Translating Good Growth for the Historic Environment*. And we flag the advantage of upfront archaeological assessment in de-risking the planning process.

Draft Health Inequalities Strategy:

The strategy addresses the variation in health outcomes that Londoners experience across the capital. Although the connection between the historic environment and health issues may not be obvious, we note the role that quality in the built and historic environment can play in promoting the vitality of local places to the benefit of local communities. In addition, a number of research projects indicate a positive link between heritage and mental health, for example, through volunteering roles.

Chapter 7 The IIA Framework

We support the IIA objectives and guide questions for the Historic Environment, and note the complementary objectives for Design and Culture, which we also support

Historic England's Comments on the Appraisals in Chapters 8 and 9 of the IIA

London Plan Policy/Para	Detailed comments on individual assessments in the IIA Please cross-reference to our main response to the London Plan and the relevant policy	Recommendation Please cross-reference to our main response to the London Plan and the relevant policy
Chapter 1	Planning London's Future (Good Growth Policies)	
Good Growth Policies	We welcome the concept of Good Growth and note that the policies are linked to sustainable development.	The strategic role of the historic environment in achieving good growth could be clearer – see reference in 7.1.1
Policy GG1 Building Strong and inclusive communities	The preferred option is shown as having no relationship with the historic environment objective (Table 21). This is in contrast to Option 3, the community-led option. Historic England considers good place-making recognises, and builds from, the contribution heritage makes to identity and social cohesion.	We recommend review. Our proposed changes in the consultation response are in line with an inclusive approach to good growth.
Policy GG2 Making the best use of land	The assessment of the preferred option states that high density developments should ensure heritage assets are protected, and identifies that heritage assets in town centres form an important part of local character. Table 23 records an unknown, potentially negative, impact for the historic environment.	We recommend review. Our proposed strengthening of policy GG2 and text is needed to ensure sufficient consideration of heritage impacts.
Chapter 2	Spatial Development Patterns	
Policy SD1 Opportunity Areas	Historic England recognises that brownfield land can offer opportunities for new typologies and character areas. However, all Opportunity Areas (OAs) contain some heritage significance and this should be assessed as part of positive master planning. Characterisation studies, such as that for Old Oak Common, can provide the basis for integrating locally valued heritage assets.	The appraisal in 9.1.1, and Table 46, should be reviewed and amended to reflect the need for assessment of heritage assets and their settings, within and adjoining the OAs. Our proposed changes should be introduced to resolve this issue.

London Plan Policy/Para	Detailed comments on individual assessments in the IIA Please cross-reference to our main response to the London Plan and the relevant policy	Recommendation Please cross-reference to our main response to the London Plan and the relevant policy
	<p>In some OAs there are significant designated heritage assets within the area, or surrounding it. For example, Kingston old town centre has high significance and is located close to sensitive historic landscapes, and the Great West Corridor is located within an area containing London’s most exceptional collection of historic landscapes including the Royal Botanic Gardens, Kew World Heritage Site. In each case, the significance of the heritage assets and their settings will need to be carefully analysed.</p> <p>We disagree with the appraisal in 9.1.1 and Table 46 showing a potentially positive outcome for the historic environment based on policy SD1</p>	
Opportunity Areas – designation	As a general comment - it would be helpful to see how alternative options for new Opportunity Areas (OAs) were appraised in the IIA. The Plan proposes 6 new OAs.	
Chapter 3	Design	
Policy D8 Tall buildings	<p>The initial appraisal in 9.2.8 does not, in our view, give sufficient consideration to the potential impacts of tall buildings on the settings of heritage assets. This is surprising given that impact on settings is one issue identified as a potential concern elsewhere in the IIA.</p> <p>We disagree with the assessment in Table 63 that the potential effects of the policy are neutral for the historic environment.</p>	<p>The appraisal and Table 63 should be reviewed, taking account of our comments on policy D8, and also policies SD1 and SI14.</p> <p>Historic England Advice Note 4 ‘<i>Tall Buildings</i>’ and GPA Note 3 ‘<i>The Setting of Heritage Assets</i>’ are relevant here.</p>
Chapter 4	Housing	
Policy H2 Small sites	The implications of the small sites policy for designated heritage assets, and the conflicts with legislative duties and national policy, are not	There are significant implications for the historic environment from this policy, which

London Plan Policy/Para	Detailed comments on individual assessments in the IIA Please cross-reference to our main response to the London Plan and the relevant policy	Recommendation Please cross-reference to our main response to the London Plan and the relevant policy
	<p>referred to in the assessment, which is a significant omission.</p> <p>We disagree with the assessment and Table 70 indicating a neutral impact for the historic environment.</p>	<p>are not identified. Please review the appraisal and table 70, and refer to our proposed amendment.</p>
Chapter 8	Green infrastructure and natural Environment	
Policy G1 Green Infrastructure	<p>The initial appraisal correctly identifies that heritage assets characterise green and open spaces. Indeed, London’s major open spaces, the Royal Parks, are designed landscapes and identified on Historic England’s national Register of Parks and Gardens of Special Historic Interest, together with other historic landscapes. The historic interest of London’s open spaces should, in our view, be recognised in this policy, as part of their multi-functional appeal.</p> <p>This strong relationship between green space and cultural heritage is made very clearly in the Government’s recently published ‘<i>Heritage Statement</i>’ and in the ‘<i>25 year Environment Plan</i>’.</p> <p>Historic England has asked for reference to the historic interest of London’s green open space in the Mayor’s draft Environment Strategy, which would bring it in line with the above Government statements.</p>	<p>We recommend review to include references to landscape and heritage conservation interest, as suggested in our proposed amendment.</p>
Chapter 9	Sustainable Infrastructure	
SI 10 Aggregates	<p>The initial appraisal and Table 130 should identify the potential impact on archaeological remains from aggregate extraction.</p>	<p>We recommend review and suggest an amendment in accordance with our proposed change.</p>

London Plan Policy/Para	Detailed comments on individual assessments in the IIA Please cross-reference to our main response to the London Plan and the relevant policy	Recommendation Please cross-reference to our main response to the London Plan and the relevant policy
SI 14 Waterways – strategic role	The strategic value of the Thames to how the capital’s exceptional heritage assets are experienced is immeasurable. The initial assessment should address this gap in the policy coverage, and make recommendations to strengthen accordingly.	We recommend review and additions to the policy to recognise this strategic value of the Thames.

Published background documents

General

A City for All Londoners, Mayor of London, October 2016: <https://www.london.gov.uk/get-involved/all-consultations/city-all-londoners> (pages 11, 65, 67, 83/84).

Heritage Statement 2017, Department for Digital, Culture, Media and Sport, December 2017: <https://www.gov.uk/government/publications/the-heritage-statement-2017>

Report of the Joint ICOMOS/ICCROM Reactive Monitoring Mission to the Palace of Westminster, Westminster Abbey and St Margaret's Church, June 2017:
<http://whc.unesco.org/en/documents/158724>

Heritage Counts: Heritage and the Economy 2017:
<https://historicengland.org.uk/research/heritage-counts/2017-conservation-areas/heritage-and-economy/> and *Heritage and the Economy: London*:
<https://content.historicengland.org.uk/content/heritage-counts/pub/2017/london-heritage-economy-2017.pdf>

Historic England Advice Note 4 *Tall Buildings*: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

Historic Environment Good Practice in Planning Note 3 *The Setting of Heritage Assets*:
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

Historic England's London Plan research reports and background evidence

All the following publications are available on Historic England's '**Keep it London**' webpage: <https://historicengland.org.uk/get-involved/protect/keep-it-london/>

Keep it London: Putting heritage at the heart of London's future, Historic England, December 2016

London Plan Review, Arup, September 2016

Characterisation of London's Historic Environment, Land Use Consultants, August 2016

London's Local Character and Density, Allies and Morrison, September 2016

London Plan Archaeology Topic Paper: Delivering better, faster and focused public benefits, Historic England/ALGAO, March 2017

Translating Good Growth for the Historic Environment, Historic England, April 2017

Risky Business? – Investing in Heritage at Risk, Lichfields, January 2018

Historic England's responses to the Mayor's draft strategies for London, available at:

<https://historicengland.org.uk/whats-new/in-your-area/london/london-plan-strategies-consultation/#Section3Text>

To date, responses have been made to the draft strategies for:

Transport, Environment, Housing, Health Inequalities

Responses to the Mayor's Culture Strategy and Economic Strategy will be available on the same webpage once issued.

Images in this response

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