



Historic England

Greater London Authority
City Hall
The Queen's Walk
More London
London SE1 2AA

BY E-MAIL

9th December 2016

Dear Sadiq,

A City for all Londoners

Thank you for consulting Historic England on the Mayor's vision, *A City for all Londoners*.

Historic England is the Government's adviser on the historic environment. We believe it is important to ensure the protection of the historic environment is fully taken into account at all stages and levels of the development of all Mayoral strategies, in particular the London Plan, through active and continuous engagement.

As an aid to discussions on the future of London, we have published ***Keep it London: Putting heritage at the heart of London's future*** (<https://content.historicengland.org.uk/content/docs/get-involved/keep-it-london-roundtable-report.pdf>). The report is based on a roundtable discussion made up of a panel of experts representing planning, heritage, and property development. The recommendations are:

1. Let Londoners speak
2. Celebrate London's character
3. Put heritage at the heart of London's future
4. Establish a London-wide heritage strategy
5. Encourage a more proactive role for Historic England



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The panel's overall feedback received was that heritage needs to be at the heart of London's future management. By building on London's special character and diversity, the city will continue to flourish and remain distinct and resilient.

The recommendations raised by the panel, and endorsed by Historic England reflect national policy as set out by the National Planning Policy Framework (NPPF), which clearly states the planning system should contribute to the achievement of sustainable development (NPPF para 6), which comprises of economic, social and environmental 'dimensions', and gains should be achieved in all three jointly and simultaneously (NPPF para 8).

As an environmental 'dimension', the conservation of 'heritage assets 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' is identified as a core planning principle (NPPF para 17).

More specifically there is an expectation that local planning authorities such as the Mayor should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 126). This should be supported by a robust evidence base which clearly demonstrates an understanding of London's historic environment, the significance of its heritage assets and their contribution to the wider environment (NPPF para 169). In this context it is important to recognise that heritage assets are widely defined as any building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in both plan and decision making. Heritage assets include both designated heritage assets and undesignated assets identified by the local planning authority. They can be visible, buried or submerged and include landscaped, planted or managed flora.

In this regard all of the Mayoral strategies have a role to play in delivering sustainable development. We recognise the review of the London Plan provides the greatest opportunity in which to ensure the future management of London's rich and diverse heritage is appropriately conserved and enjoyed. A clear understanding of heritage's value and contribution to the Mayor's wider social, cultural, economic and environmental agendas is essential

In this context, we ask the Mayor to undertake the following when developing further his vision into the London Plan and other relevant strategies:

- Develop a clear and robust understanding of London's historic environment, its heritage assets and the interconnected places that characterise London, as baseline evidence, including use of the Greater London Archaeological Advisory Service (GLAAS) Historic Environment Record to support the following specific areas of policy development.
- Ensure management of the historic environment is recognised as a key part of the environment dimension of achieving sustainable development, as well as being a



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key contributor to the culture, economic, climate change and social cohesion agendas.

- Pursue a character-led approach to achieving high densities in London, where the values and interest associated with heritage assets are embedded as a key principle in achieving good growth in London's diverse and special places.
- Provide a robust strategic approach to the management of tall buildings across London, which sets out clearly where and why tall buildings are justified, in the context of conserving our historic environment and significance of its heritage assets.
- Undertake a thorough review of London's designated views as currently captured by the London View Management Framework, with an emphasis upon greater protection for the setting and appreciation of iconic landmarks such as St Paul's Cathedral, the Palace of Westminster and the Tower of London, as well as wider townscape characteristics.
- A coherent policy approach to the conservation and management of the River Thames, in terms of its openness, heritage interest and relationship with the surrounding townscape/landscape.

In order to help meet these asks, we would like to share with you the findings of three research studies commissioned by Historic England. These focused on: the effectiveness of the existing heritage policies in the current London Plan; an audit of Borough-wide characterisation studies; and a strategic assessment of London's character and its capacity to accommodate change (<https://historicengland.org.uk/whats-new/in-your-area/london/#Section1Text>) A key outcome from these studies was that an opportunity exists for the GLA, in partnership with Historic England, to develop a Heritage Strategy that can inform the development and implementation of the Mayor's strategies, including the London Plan. The broad objectives of a **Heritage Strategy** would be to:

- increase awareness and understanding about the value of heritage to the capital, its international identity, economy and the delivery of sustainable growth;
- place heritage as a key component of a development strategy for London;
- set out how boroughs, the GLA and Historic England can work more collaboratively in gathering evidence, sharing best practices and developing new tools celebrating and using London's heritage as part of its regeneration;
- identify strategic heritage priorities and policy directions for the successful management of challenging pan-London issues such as, regeneration of historic places, managing the setting of World Heritage Sites, appropriate location of tall buildings, delivery of growth in strategic locations;
- draw together a programme of existing and new celebratory activities and projects that highlight the community and wider benefits of heritage to London and its people; and
- provide a framework for monitoring good heritage management and promoting its successes.

We would welcome early discussion on the development of a Heritage Strategy as a key paper supporting the development and interpretation of the Mayor's vision into a new London Plan.



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Historic England would also like to highlight how we are alive to the important messages included in your foreword. We share your view that London is special in part for its openness and diversity, a truly world city both today and historically. We are pleased to emphasise this in our work in London as well. For example the Grade II* Brick Lane Jamme Masjid, the Grade II Royal Vauxhall Tavern, the Grade II Brixton Markets and the Grade II* Waterloo Bridge built by women are just a few of many examples where cultural and historic significance are a main reason that the buildings are celebrated and protected on the National Heritage List. We also have evidence that historic buildings and places are particularly popular with creative industries, since they are often inspiring and adaptable structures and spaces, and heritage can be a real asset to London here, too. We would welcome working with your Cultural team on projects that explore and emphasise the importance of the historic environment to all Londoners.

In summary, we welcome the opportunity to work with you and your team in the further development of your vision so that it ensures heritage is at the heart of London's future. Please do not hesitate to contact me to discuss further how Historic England can provide support.

Yours faithfully,



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