

## Appendix B:



### Historic England's responses to the Questions set by the Outer London Commission:

#### A. Growth Options

*G1 How important is it to maintain a balance between housing and employment in a growing post-industrial city? What do you think the right balance is?*

#### **Historic England's Response**

Socially cohesive neighbourhoods (promoted by living and working locally) are critical to identifying and engaging positively with, and caring for, the fabric and character of local areas and their heritage assets. This character has the potential to contribute to the vitality and viability of neighbourhoods, thereby ensuring that historic areas and individual heritage assets, both designated and undesignated, are maintained in beneficial use.

The promotion of mixed use places which support the development of a balanced relationship between jobs and housing can also influence the form of new development, and enables the introduction of different typologies to accommodate work spaces. In all cases it is important to consider the historic context and use this to achieve a sustainable balance. Live/work typologies can result in imaginative re-use of existing the existing built form, including industrial heritage— a good example in inner London is Shoreditch, where former historic warehouses have been successfully adapted within the context of a detailed historical analysis and a planned approach through the South Shoreditch SPD, to meet both housing and employment needs in a way that sustains their unique identity.

A strong locational relationship between jobs and housing can reduce the need for travel; the resulting reduced need for hard infrastructure is likely to make fewer demands on, and be less disruptive to the built fabric and historic environment of London.

*G2 If London continues to expand the housing pipeline/ allocations, will that distort the balance between housing and employment? What significant effects might that have within different parts of outer London?*

#### **Historic England's Response**

The guiding principle for accommodating growth in London should be that it is sustainable in every sense. The role of planning policy is to seek strategic solutions and patterns of development that deliver economic, social and environmental gains jointly and simultaneously (NPPF, paragraph 8).

This requires a balanced approach where all issues are given equal consideration. If housing is provided at the expense of employment or environmental quality – including London’s character and heritage – the effects locally are likely to be unsustainable in the long term.

On reviewing the scenarios for growth suggested in the background paper (OLC Options for Growth, Issue 1). At this stage it is difficult to assess with confidence the specific impacts upon Outer London’s heritage assets and the wider historic environment. For example in the case of Option 3, not all town centres are of heritage interest, but as highlighted in Historic England’s response to the Further Alterations to the London Plan (2014) many of London’s existing town centres, including many in Outer London, are of historic interest and contain designated heritage assets including listed buildings and conservation areas. (Please note, further details are provided in response to question G4). In these cases expansion of housing site allocations/pipelines without reference to existing character could have a serious impact upon the significance of heritage assets and local identity.

The problem of lack of implementation of planning permissions for housing requires careful analysis especially in relation to non-planning problems (as suggested in the background paper, paragraph 5.3). The solution can then be tailored appropriately. Bringing forward a greater number of potential sites for housing than is likely to be implemented could undermine the central purpose of planning policy, and reduce the opportunity to guide development to the locations that are most in need. This includes areas requiring sensitive regeneration based on local heritage and character.

*G3 What type of workspace/ employment land will be required in the future relative to trends in the existing stock? Does this require a policy approach which extends beyond London?*

#### ***Historic England’s Response***

The nature and form of future employment needs are hard to predict and therefore the inherent adaptability of much of the historic environment as a valuable resource should be recognised. There is ample evidence to demonstrate the attraction and flexibility that historic buildings hold for many forms of employment uses and investment opportunities. This is supported by key stakeholders such as property agents, who in research undertaken by Locum on the *Impact of historic environment regeneration* (2010) (<http://hc.historicengland.org.uk/content/pub/Impact-HE-Regeneration>) stated that historic buildings are attractive to creative industries because they are smaller, more flexible and cost effective. In addition it was noted that people spend more in their local economy after investment in the historic environment. For example in areas that had received investment in the historic environment, approximately one in five visitors in a survey of 1,000 stated they spent more in an area after investment than they did before. Whilst one in four businesses stated that the historic environment investment had directly led to an increase in business turn-over.

Businesses that occupy listed buildings generate £13,000 extra gross value added (GVA) per business per year<sup>10</sup> (This extra GVA is above the amount generated by an equivalent number of businesses in non-listed buildings).

*HLF (2013) New ideas need old buildings*

Some of the most vibrant seed-beds for new industries are associated with historic areas and buildings in London. In central London this is exemplified by the use of historic buildings in areas on the fringe of the City of London, in and around Old Street roundabout, and Clerkenwell/Farringdon. In some cases these buildings are adapted to provide combined living and working spaces.

A very high proportion of creative industries based in historic buildings are start-ups, with over 60% established between 2010 and 2013.

*HLF (2013) New ideas need old buildings*

In Outer London boroughs there are significant opportunities to utilise existing historical features such as canal and other waterside environments as a basis to attract to new industries and small businesses. Key building types such as historic hospitals, civic buildings, fire stations and historic infrastructure can be adapted for employment and/or residential use, subject to careful understanding of their significance. . For example the conversion of Chingford Mill pumping station in Waltham Forest (listed grade II) into residential use allowed this example of historic infrastructure sustain local identity while providing distinctive housing to meet modern needs. In other cases there are opportunities for large-scale historic buildings to be adapted for small business units - e.g. the Gillette building on the Great West Road, Hounslow, and the conversion of former furniture warehouses in Shoreditch. The study “*New ideas need old buildings*” (HLF 2013) identifies the attraction of historic buildings to small industries and innovative uses. Major historic buildings can be effective in promoting a unique image, and can offer large scale, flexible floor areas for subdivision and clustering of small businesses. This in turn assists both the local economy and sustains local heritage assets.

Historic England supports a positive policy approach to sustaining the historic environment in line with the NPPF paragraphs 126 and 157(8). Therefore we suggest that recognising the potential of heritage as a catalyst for regeneration and growth, through adaptive re-use, should be a key area of policy in London as a whole, which can also make a valuable contribution to reducing the current number of heritage assets on the Historic England Heritage at Risk Register 2014 through positive viable uses. The heritage of outer London in this context is distinct and valuable to the story of London as a whole; its significance extends well beyond the boundaries of the capital and binds the city to its hinterland, most evidently through historic landscapes, transport arteries such as canals, rivers and roads. This strategic role of heritage deserves recognition within new policies for London and the wider South East.

Over 300 designated heritage assets are At Risk in outer London, representing 45% of all assets in London on the Historic England Register.

*Historic England - Heritage Counts 2014* (please see Appendix B (i) for details)

*G4 In the context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?*

- *Increasing outer London densities, particularly through suburban renewal*
- *More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport*
- *Greater cumulative contribution of small scale sites, such as infill*
- *Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)*
- *Densification of built up areas beyond London (new towns; garden cities, suburban extensions)*

*For each, where might there be particular opportunities, how could this be supported and what / where are the specific challenges and constraints (e.g. what impact might this have on character and context; land values; balance between housing and employment; access to particular types / lower cost employment space, infrastructure requirement, etc).*

### ***Historic England's Response***

An understanding of the character of areas, including historic context, is essential to identify both challenges and inform the opportunities for increasing housing density levels. Such evaluation should be a fundamental part of the evidence for establishing a sustainable approach, and should be used to determine where the emphasis among the five listed options should lie in different local areas.

Assessment of capacity in specific areas can be tested through research in pilot scenarios in real locations to identify what growth would look like, the likely impact of growth on a place's character and distinctiveness, and how unnecessary harm can be avoided.

To determine the appropriate level of growth and identify locations with additional capacity a collaborative approach with key stakeholders is required, including Historic England.

The following comments are made as a contribution to the Options for Growth as provided in the background paper. We refer to specific evidence where it exists; in all cases these views are subject to further testing of impacts and effects, as described above.

- *Increasing outer London densities, particularly through suburban renewal – with reference to interwar suburban development*

The Outer London Commission's first report (June 2010) refers to the outward growth of London embracing ancient towns and villages in the C20 (p31/2). These subsumed settlements are still, in most cases, recognisable historic centres, many containing historic buildings of greater antiquity than is generally characteristic of central London.

The joining-up of the outer London settlements with late Victorian and C20 suburbs has produced many areas of high quality suburban development as well as some areas that have not been well planned, have lost coherence, or require regeneration. We note that the Commission is particularly interested in the capacity of inter-war suburbs.

The publication 'Rediscovered Utopias: Saving London's suburbs' (SAVE/EH 2010) identifies some of the best examples of the capital's suburban heritage including some built in outer London in the interwar years - The Mayfield estate, Ilford (LB Redbridge) built 1919-37, Monkams, Woodford (LB Redbridge) built 1919-1939, Pinnerwood Park Estate, Pinner (LB Harrow) 1932-39 and South Lodge estate, Oakwood (LB Enfield), 1935-40. This is a small selection celebrating successful developments. Most of the outer London Boroughs have prepared characterisation reports identifying the different housing typologies within their suburbs. This enables the definition of character areas and the identification of areas worthy of designation for their distinctiveness. The London Borough of Enfield characterisation report provides a useful example and this is supported by conservation area appraisals and management plans for the interwar suburbs of Abbotshall Avenue, Meadway, Southgate Circus and Turkey Street (web link: [http://www.enfield.gov.uk/info/200057/planning\\_policy/1834/local\\_plan\\_evidence\\_base/2](http://www.enfield.gov.uk/info/200057/planning_policy/1834/local_plan_evidence_base/2)).

Historic England supports the continued conservation and management of these and other suburban areas reflecting the interest and traditions of the time they were built, and contributing positively to the housing stock of London. We recommend that Historic England's published guidance 'Suburbs and the Historic Environment' (2007) and the linked background paper 'The Heritage of Historic Suburbs' should be followed in taking forward any proposals for significant change in London's suburbs (web link: <https://historicengland.org.uk/advice/planning/housing/historic-suburbs/>).

The recent debate about intensification of London's suburbs identifies potential capacity where housing densities are low. This low density is particularly characteristic of the inter-war expansion of London in the 1920s and 1930s and this surge in house building is reflected in the graph in the background paper, *Removing Barriers to Housing Delivery* (p8). Within this housing stock there is considerable variety, as well as homogeneity so it is vital that the character of such areas is fully appraised before any strategic decisions are taken regarding densification. From a heritage perspective there could be some scope for intensification, for instance through 3 or 4 storey developments, based around streets, to ensure environmental quality and local urban design is maintained and enhanced; and where appropriate to character, this may present a viable, sustainable source for new housing units.

- *More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport*

Opportunity sites/intensification areas - It is vital to establish the nature and significance of heritage assets within and surrounding major sites in advance of development coming forward. Historic England advocates the integration of information characterising this resource from the earliest stage. Where hyper-dense proposals are promoted, particularly in the form of towers, the impact on the surrounding urban area, including the settings of heritage assets and important views, is a key issue. Historic England's early engagement in the development of Opportunity Area frameworks helps to provide clarity on the heritage value of an area and the potential impacts from future

developments. For example we are currently engaged with the Mayoral Development Corporation for Old Oak Common and Park Royal, providing support in establishing the potential impact on the setting of key heritage assets such as Kensal Green Cemetery registered historic park and its numerous listed monuments, from proposals in the Opportunity Area. We are actively seeking to apply this experience elsewhere in places such as Brentford and the Great West Road Golden Mile where proposals for intensification of development require particular care in response to the setting of Kew World Heritage Site and the designated heritage assets of Syon House, Syon Park, and Gunnersbury Park. Historic England is engaging with Hounslow Council as they begin analysis of these sensitivities to inform a proposed increase in development in this area (a potential new Opportunity Area).

Town Centres – Historic England would expect strategic planning policy, through the London Plan, to be responsive to the diversity and significance of London’s character and heritage assets. In our response to the Further Alterations to the London Plan (FALP) in 2014 we drew attention to the lack of justification for the growth policy directions (High-Medium-Low) in relation to London’s town centres, many of which are of ancient origin. While accepting the potential for increased growth in and around many town centres Historic England identified the policy change was, in effect, a blunt instrument, and was not sufficiently refined to distinguish between town centres of different character and heritage value. The policy also relies on boundaries (as defined in local plans) which in many cases are drawn tightly around town centres, resulting in potential comprehensive re-development of historic cores. Historic England’s desk based assessment of the town centres at the time of the Further Alteration highlighted potential concerns for substantial growth in town centres such as Pinner, Cheam, Carshalton, and Rainham. Full details of Historic England’s assessment are attached (please see Appendix B (ii)).

The commentary that follows the report (Appendix B (iii)) sets out Historic England’s rationale for recommending that 16 town centres be changed to a low policy direction. It is based on Historic England’s desk based assessment of the c.210 town centres included in the London Plan. This has taken as its sources: Section 3.7.3 of the GLA’s 2013 *London Town Centre Health Check Analysis Report* (March 2014); data from the London Historic Environment Record; and Local Planning Authority online resources (incl. conservation area appraisals, policy and town centre maps).

Historic England advocates the sustainable development of town centres, and their surrounding areas, in a manner appropriate to the safeguarding of their distinctive contribution to local identity and London’s heritage. Within the coming year, we will be discussing further analysis of town centres with the GLA and relevant outer London Boroughs.

As a way forward, Historic England believes that a sensitive, measured approach to town centre development will avoid the mistakes of the past, exemplified in several comprehensive shopping malls and schemes, such as in Wood Green and Harrow. A shift to hyper-density residential development without careful consideration of the qualities that exist within, and around, town centres runs a greater risk of either destroying or negatively imposing on the distinctive heritage which makes them such attractive locations (as expressed by the NPPF dimensions of sustainable development – economic, social and environmental). For example recent town centre proposals for Kingston-upon-Thames and Ealing raise very significant concerns that character and distinctiveness

are seen as expendable when, in reality, they contribute to lasting sustainability, and should be harnessed fully to promote economic and social wellbeing, locally and strategically, as part of a diverse and unique capital city.

- *Greater cumulative contribution of small scale sites, such as infill*

Historic England notes the contribution that organic change can make towards accommodating new development. Where infill is identified within a SHLAA, or in a local plan site allocations document, care should be exercised to ensure the capacity of sites is assessed to take account of heritage assets and their settings. If this has not been undertaken, the capacity should be clearly identified as provisional, subject to further assessment.

Some small scale infill development is 'windfall' and must be considered on a case by case basis. Such development should be assessed against relevant historic environment parameters including locally prepared conservation area appraisals and masterplans.

- *Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)*

The Green Belt purposes of controlling unrestricted sprawl of London's urban area, assisting regeneration, maintaining access to the open countryside and protecting the historic character of towns are all relevant considerations. In addition, site specific issues will have to be assessed where they might affect the significance of heritage assets, including archaeology. Historic England supports the principles of the Green Belt set out in national policy and any selective releases should not weaken the present robustness of this long-held policy. Notwithstanding this, selective releases may not be harmful, if appropriately assessed and justified.

- *Densification of built up areas beyond London (new towns; garden cities, suburban extensions)*

The principal issues associated with densification in London, and already raised above, are also relevant to other locations outside of London, in the new towns, garden cities and when considering extensions of existing settlements. Proposals for densification in historic places should be developed from a basis of understanding. This includes the need to identify and assess the defining characteristics of a place that make it distinctive, and valued (whether through formal heritage designations or not). This understanding then should help inform how change can be accommodated, so that new developments can be successfully integrated in line with delivering sustainable places.

Strategic approaches to accommodating growth can offer benefits in terms of reducing urban sprawl and allowing appropriate masterplanning of development, taking account of historic character and significance.

*G6 Would it be worth considering growth 'corridors' (e.g. as with LSCC and linked to existing / potential public transport) in terms of enabling an integrated housing / employment / cross-boundary strategy...and if so, which corridors could be a focus (e.g. associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick)?*

#### **Historic England's Response**

A holistic approach to delivering growth in the context of understanding the character of London as whole, and its component parts, is essential. This includes understanding the hierarchy of places and their relationship with the spatial functions of the city. Historically, higher density developments have taken place along key infrastructure, whether linear routes or spot locations (e.g. stations), arterial routes, central zone and town centres. We would therefore encourage further analysis of the historical development of places as a baseline (e.g. building typologies, urban patterns, building scale/form and densities) to inform how future developments could be introduced which respect the historic and local context of a place when delivering growth. This includes a review of established growth corridors. Historic England would be interested to be involved in such a study.

*G7 How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (e.g. provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)*

#### **Historic England's Response**

The key to delivering the benefits of growth regionally, sub-regionally and locally is to support developments that optimise the potential that exist in every site, building or place. National policy is clear that to achieve sustainable development, gains in the economic, social and environmental qualities of a place should be sought jointly and simultaneously. To achieve this, an understanding of all of the issues and challenges need to be identified and assessed, in partnership with key stakeholders, including local communities. This approach reflects the concept of good place-making that Historic England advocates in the heritage sector through Constructive Conservation (web link: <https://historicengland.org.uk/advice/constructive-conservation/>). This is a positive, well-informed and collaborative approach to conservation. It is a flexible process which helps people understand their historic environment and use that understanding to manage change effectively. In many cases Historic England has supported innovative schemes that protect and enhance the significance of buildings and historic places, by working collaboratively with owners, architects and developers to help them develop proposals that optimise the potential of sites.

*G8 Does the London Plan density matrix need to be reviewed (eg PTAL splits, characterisation, the ranges themselves), or is it better to keep it as a benchmark and use it to bargain for higher quality / more social infrastructure / more affordable housing?*



### ***Historic England's Response***

Yes – We consider the historic environment is a key component part of London's identity and success as a world city. Heritage assets are the recognised elements of the historic environment and as highlighted elsewhere in our response, prevalent throughout London, including Outer London, with some particular concentrations. They contribute significantly to the character of places and should be used, as part of any delivery mechanism, as a baseline to inform the location, scale and form of future development. London's heritage is part of the city's infrastructure and as such should be considered as a strategic planning consideration when developing the SHLAA and identifying nominal capacity figures. This includes when defining the setting/character of places as reflected in the Density Matrix, and when applying the 'probability' concept. It is appreciated that defining the 'probability' could be difficult to achieve when considering the wide range of heritage assets, but there is an opportunity to develop joint research on the application of the Mayor's Density Matrix in historic places, as a baseline to understanding their capacity to accommodate intensification.

Historic England has expressed willingness through its response to the Mayor's draft Interim Housing Strategy to be engaged in the strategic level of assessment; however, the importance of this being carried out in conjunction with the Boroughs cannot be over-emphasised, as they are in the best position to assess local character. Together this twin approach should help identify more realistically the challenges of sites and their surroundings, and their heritage interest early in the process, delivering a more robust understanding of realistic densities and capacity. Such an approach reflects the NPPF/NPPG and would ensure the housing policy in the London Plan is based on robust evidence and early testing.

*G9 Have you any suggestions for new Opportunity/Intensification Areas; or medium sized town centres suitable for higher density, housing led renewal/redevelopment?*

### ***Historic England's Response***

No – however Historic England should be engaged early in the process of identifying potential Opportunity/Intensification Areas, as a key partner that can help in understanding the challenges and opportunities of an area to deliver additional growth. Recent examples of our early engagement and the value we have added are now being seen in the development of policies and proposals for the recently expanded Old Oak Common Opportunity Area in West London. Here, working with the Boroughs and the recently formed Mayoral Development Corporation (MDC), we are providing support in understanding the heritage interests of the area and its ability to accommodate substantial change. Our engagement is valued and the advice/evidence provided is being actively used in the development of the Local Plan for the MDC.

## **B. New Approaches to Regional Co-ordination**

### **Function**

R1 Should London and the wider south east be viewed as one area for managing growth? What are the planning implications of this for housing and jobs growth and strategic infrastructure provision?

#### ***Historic England's Response***

There is value in the management of growth at a wider 'supra-regional' level as the historic environment is both a strategic and local issue. The historical development of London is inseparable from that of the wider South East. It is important that London relates positively to its hinterland and that if growth is re-distributed within this wider area that it is sensitively planned. For instance, historic settlements with high accessibility to London and/or major infrastructure can become overwhelmed by growth if it is not carefully integrated to respect local character and the capacity of historic cores. Historic England looks forward to participating in any strategic planning initiatives at this level as we have a unique position to play as a national body with detailed knowledge and involvement in both strategic and local issues (further details provide in response to question R2). This includes active participation in any forthcoming Regional Roundtable discussion or as a dedicated member of the Strategic Spatial Planning Officer liaison group. This last group currently has a representative from the Environment Agency, and for constituency we would suggest the three main statutory environmental agencies should be equally engaged.

R2 *Which strategic policy issues affecting this part of London would benefit from being considered through some co-ordination of planning with authorities across the wider south east as a whole, or with representative of adjoining sub -regions?*

#### ***Historic England's Response***

Strategic policy issues which should be considered include the management of the historic environment. The development of London and the surrounding counties has not always reflected the administrative boundaries operated today. The character of places transcend these types of boundaries, with much of the historic interest in the Outer London boroughs reflecting the architectural and townscape qualities of the counties of which they were previously part. London's urban expansion, in particular during the 19<sup>th</sup> and 20<sup>th</sup> centuries, did not always result in the loss of vernacular features found currently in Essex, Hertfordshire, Surrey, Berks and Kent. In many of the former villages, now town centres, and within individual buildings and spaces, these 'home county' features remain an integral part of Outer London's character.

As a national statutory body, Historic England already engages with strategic planning through its local offices and will continue to provide support and advice on cross-boundary, regional and sub-regional policy issues. In addition we have extensive connections and working relationships with all local authorities and other stakeholders in London and surrounding areas, which enables us to identify best practice and deliver consistency in approach and advice. We would welcome the

opportunity to be actively engaged in the development and participation of regional or sub-regional groups that look at the key strategic issues for London and beyond.

*R3 Should new co-ordinating arrangements only consider pan-regional or also cross-boundary issues? At what level does an issue go from being cross boundary to pan-regional?*

**Historic England's Response**

We have no specific comments to make.

*R4 How could useful co-operative relationships be built (over time) across the border, going beyond the statutory requirements under which the Mayor and LPAs work? How can any value be added to this process?*

**Historic England's Response**

We have no specific comments to make.

*R5 How could new co-ordination arrangements usefully promote and enable the development of a common evidence base, and a shared understanding of how local and sub-regional economies, housing markets and labour markets interact and to what extent could it do this effectively?*

**Historic England's Response**

Please see our comments to question R2.

*R6 How could new co-ordination arrangements facilitate the identification of different views among its members? And how might these different views be accommodated?*

**Historic England's Response**

To ensure all relevant views are engaged, the broader discussions on the future of London and the wider South East should involve all key stakeholders in both strategic and local issues. This includes the main statutory environmental bodies such as Historic England, Environment Agency and Natural England.

**Form**

*R7 Which geographical area should new co-ordination arrangements cover? Should it vary depending on the issue?*

### ***Historic England's Response***

The nature of the issue should be a key factor shaping the nature of arrangements for coordination and membership of the group. Please see our response to question R2 and R6, as it illustrates that heritage issues are strategic in nature.

*R8 Who could constitute the membership? How many local authority representatives, how many LEP representatives and others should be directly involved?*

### ***Historic England's Response***

We recommend Historic England is included in the membership, as a national organisation, statutory consultee, and as a public body subject to 'duty to cooperate' requirements. We would welcome the opportunity to be engaged early and continuously in the development and participation of any future regional group.

*R9 What should be the format of new co-ordination arrangements, and how many layers should it have? For example, should it include a regional plenary for all members and/or sub-committees for specific issues/ areas? Plus a political leadership group and officer servicing group?*

### ***Historic England's Response***

We have no specific comments to make.

*R10 How should new co-ordination arrangements be managed and by whom, and how should the required resources be shared? And how should it engage with its constituents/ the public?*

### ***Historic England's Response***

We have no specific comments to make.

*R11 How should new co-ordination arrangements relate to and work with structures and bodies within London?*

### ***Historic England's Response***

We have no specific comments to make.

*R12 Should an evolutionary or incremental approach be taken to the development of new co-ordination arrangement, capable of adapting to changing circumstances – or should it be firmly fixed from the outset?*

### ***Historic England's Response***

We have no specific comments to make.

### **C. Barriers to Housing Delivery**

H1      *What are the particular barriers holding back delivery of new housing in this sub region?*

#### ***Historic England's Response***

Heritage is not a barrier but an aid to delivering sustainable development. Through application of *Constructive Conservation*, which is a positive, well-informed and collaborative approach to conservation it has been demonstrated that a flexible process of helping people understand their historic environment and use that understanding to manage change, can deliver sustainable development. This has been achieved by:

- Pursuing a collaborative approach with early engagement from heritage specialists and Historic England; and
- Development of a shared understanding of the heritage interests of the site and its surroundings, and
- Expressing a clear and deliverable vision for developments that include well defined design and capacity parameters.

Successful schemes have been those that protect and enhance the significance of buildings and historic places, often in innovative ways with contemporary design solutions. These have been achieved through the active engagement between owners, architects, developers, local authorities and heritage specialist including Historic England.

Examples of Constructive Conservation can be found in the attached:

<https://historicengland.org.uk/images-books/publications/constructive-conservation-sustainable-growth-historic-places/>

In addition Historic England commissioned research into the impact of housing developments on the historic environment. The findings are set out in the report *Evaluating the impact of housing development on the historic environment* LUC (2014) (<https://historicengland.org.uk/images-books/publications/evaluating-impact-housing-development-on-historic-environment/>). The Report provides a library of case studies from across England which has relevance to housing provision in London. It provides an analysis of the character of each development and the surrounding area and the impact it has on the historic environment; it also evaluated the success or otherwise of various strategies and policies used by the relevant local planning authorities to ensure that the housing in question is integrated well with its surroundings. The key findings were that the most effective ways of achieving an integrated approach include:

- Development-led characterisation approaches, by providing an objective evidence base to inform masterplanning and detailed design
- Detailed planning and development briefs, which set clear conservation and management priorities and planning tests, so helping to ensure certainty for all parties

- Conservation-led, asset-specific guidance and policy based on robust evidence, establishing frameworks for acceptable interventions.

The London case study that helps support this approach includes the Alliance House student housing development, at Newington Green, Islington. The project is successful as a contemporary design that through its scale, form, layout and detailing, respects the context of the conservation area and the locally listed China Inland Mission building. This was achieved through early engagement with heritage experts, and active use of available evidence on the heritage interest of the area and its expected management as defined by the Council's Conservation Area Management Plan.

*H2 What is constraining the private sector from translating London's pipeline of approved homes into completions, in terms of:*

- *developer sales practices and private sector concerns about market absorption;*
- *the scale of land banking and the number of approved sites owned by firms that do not actually build houses;*
- *the range and size of house building firms in London and the level of competition within the development sector; and*
- *private sector capacity and skills shortages.*

#### ***Historic England's Response***

We have no specific comments to make.

*H3 What potential is there in Outer London for:*

- *purpose built long-term, private rented sector housing (PRS)?*
- *specialist housing for students and older Londoners?*
- *housing intensification through estate regeneration schemes?*
- *the delivery of higher density development in town centres, taking into account land ownership constraints and the surrounding suburban context?*

#### ***Historic England's Response***

Focusing on the two points of housing intensification through estate regeneration schemes and the delivery of higher density development in town centres, Historic England believes there is potential to provide additional residential capacity where there are heritage interests through the following approaches:

- Housing intensification through estate regeneration:

It is recognised that many local authorities are reviewing the potential of regeneration of publically owned housing estates. In many cases the heritage interest of these sites may be limited. However as society moves forward, our perspective of what is important in our historic environment also changes. This includes a growing appreciation of the architectural and historical value of housing developments designed and constructed in the mid and late 20<sup>th</sup> century. To help avoid unnecessary delays in delivering much needed regeneration and new homes, Historic England recommends early discussions with local authorities on the future of housing estates identified for change. Our early engagement could help ensure the heritage interest of estates are identified clearly (e.g. whether none, local or national interest) and then used as a basis on which to manage regeneration.

- Delivery of higher density development in town centres:

As set out in our response to question G4, Historic England would expect strategic planning policy, through the London Plan, to be responsive to the diversity and significance of London's character and heritage assets. Within this context we strongly advocate that the historic environment is not a barrier to delivering homes and jobs. As recognised by the Inspector's report to the 'Further Alterations' to the London Plan in January 2015, new, innovative, solutions need to be found that do not damage the environmental qualities of a place. Historic England believes that higher densities could be achieved in innovative ways, but only from a good understanding the heritage interest of a place which will help to identify the opportunities it can provide. This approach should be applied consistently so allowing the individuality of places to be recognised and enable more tailored responses for new developments (e.g. in terms of sites, capacity, density, scale, form and architectural expression). To help deliver this approach, engagement with conservation specialist, whether through the local authorities and/or from Historic England is essential, so that the right information and understanding is gathered and analysed, at the right time e.g. before drawing up the parameters for development.

*H4 What are there practical measures boroughs can take to boost supply, such as:*

- *providing a more certain and speedy development management process for large developments prior to and following outline planning consent (e.g. s106 negotiations, use of conditions and condition discharge);*
- *greater use of CPO powers;*
- *wider application of the Housing Zones model to address particular local delivery challenges, working closely with the private sector and other stakeholders;*
- *widening the pool of identified and allocated large sites in Local Plans;*
- *providing a more positive and certain policy and development management framework for small scale/infill development in order to support small and medium sized house builders;*



- *requiring large sites to be parcelled up and split between a number of different developers in order to address slow build out rates and potential land banking; and*
- *conditioning minimum levels of housing output on large sites over a fixed short to medium term horizon.*
- *exploring the potential scope for ‘use it or lose it’ powers.*

### ***Historic England’s Response***

In considering the various measures highlighted above, we recommend early and continuous engagement with both local authority conservation specialists and Historic England, in order to aid the effective delivery of the measures, without causing unnecessary harm to the historic environment. This can be through both the plan making, development management and implementation stages of the planning and regeneration system.

*H5 What potential role could local authorities play in building houses, especially on surplus public sector owned land? What are the financial and regulatory obstacles that need to be overcome to enable local authorities to contribute more directly to house building in London?*

### ***Historic England’s Response***

Heritage specialists both within local authorities and from Historic England can play an important role in helping to facilitate the delivery of houses on publicly owned land. Where sites have a heritage interest (e.g. contain or are potentially within the setting of heritage assets such as listed buildings, conservation areas etc.) early and continuous engagement with specialist heritage advice has shown to be effective to ensure the sites are both developable and deliverable. Past examples of valued heritage input on the disposal and regeneration of publicly owned sites include the redevelopment of the once owned MOD land at the former RAF Bentley Priory, Stanmore (a 57 ha site, including registered landscape and a grade II\* former country house and associated listed buildings, redeveloped for predominantly residential uses and the Battle of Britain Museum), and more recently the former hospital site at St Clements in Bow (a residential led scheme with the provision of up to 250 units accommodated in a grade II listed building and new buildings). This experience and other cases have informed Historic England’s *The Disposal of Heritage Assets: Guidance note for government departments and non-departmental public bodies* (2010) (<https://content.historicengland.org.uk/images-books/publications/disposal-heritage-assets/guidance-disposals-final-jun-10.pdf/>).

This Guidance has been endorsed jointly with the Department of Culture, Media and Sport (DCMS) and the Office of Government Commerce (OGC) and is expected to be updated soon. It provides the elements of best practice for the public sector as a whole, including local authorities, health trusts, public corporations and the police, which we would encourage to be used. This includes issues around procurement and sale procedures and information, early engagement with the right people, exploring options for optimum regeneration, understanding the significance of any heritage assets affected, recognising long term maintenance issues, and holistic management of large sites.

*H6 Is there an issue about skills and capacity within local authorities in delivering planning consents for large scale developments?*

***Historic England's Response***

Yes. Between 2009 and 2015, the number of FTE (Full Time Equivalents) engaged directly with conservation in local authorities has reduced from 94.7 FTE to 89.7 FTE, representing a 5% drop in local heritage expertise across London. However, when this data is broken down between Inner and Outer London, there has been a 33% fall in FTE's engaged in conservation of the historic environment in Outer London (please see below for details). This substantial reduction in local expertise is a priority issue for Historic England. The reduction in numbers, set against the relatively constant number of heritage assets found in the Outer London Boroughs, and the increased pressure for further development, raises concerns about local authorities abilities/skills and capacity to deliver an effective heritage management service. Allowing this pattern to continue could result in poor decisions being made and/or delays in delivering effective and sustainable developments. All which could have an impact upon the historic environment but also the economic, social and environmental success of the Outer Boroughs, and London as a whole.

*H7 What role could modern methods of construction play in boosting private sector build out rates?*

***Historic England's Response***

We have no specific comments to make.

#### **Appendix B (i): Designated Heritage Assets in Outer London**

|   |   |
|---|---|
| <b>Totals</b>                           | (All % below are rounded up, or down to nearest %)      |
| Total number of Listed Buildings        | <b>5393 (or 40% of all listed buildings in London)</b>  |
| Total number of Scheduled Monuments     | <b>75 (or 90% of all SMs in London)</b>                 |
| Total number of Registered Battlefields | <b>1 (out of 1)</b>                                     |
| Total number of Parks & Gardens         | <b>62 (or 70% of all parks &amp; gardens in London)</b> |
| Total number of World Heritage Sites    | <b>1 (out of 4) – 25% of all WHS in London))</b>        |
| Total number of Conservation Areas      | <b>485 (or 48% of all conservation areas in London)</b> |

*Historic England - Heritage Counts 2014*

#### **Designated Heritage Assets at Risk in Outer London**

|                               |  |
|-------------------------------|--|
| Total number of sites At Risk | <b>301 (or 45% of all sites at risk in London)</b> |
|-------------------------------|--|

*Historic England - Heritage Counts 2014*

**Please note - Appendix B (ii)** Historic England's analysis of town centres is provided in a separate paper.

**Appendix B (iii): Conservation Service in Outer London Boroughs:**

| <b>Name of Authority</b>                 | <b>FTE 2009</b> | <b>FTE 2015</b> | <b>Change</b> | <b>% change</b> |
|--|-----------------|-----------------|---------------|-----------------|
| <b>INNER LONDON</b>                      |                 |                 |               |                 |
| City of London                           | 6               | 5.5             | -0.5          | -8%             |
| Westminster City Council                 | 15.6            | 16.1            | 0.5           | 3%              |
| London Borough of Camden                 | 9.5             | 8.4             | -1.1          | -12%            |
| London Borough of Greenwich              | 2               | 2.5             | 0.5           | 25%             |
| London Borough of Hackney                | 1.8             | 2               | 0.2           | 11%             |
| London Borough of Hammersmith and Fulham | 2               | 2.05            | 0.05          | 2%              |
| London Borough of Islington              | 5               | 4.6             | -0.4          | -8%             |
| Royal Borough of Kensington and Chelsea  | 6.3             | 9               | 2.7           | 43%             |
| London Borough of Lambeth                | 4               | 4               | 0             | 0%              |
| London Borough of Lewisham               | 2.3             | 2.3             | 0             | 0%              |
| London Borough of Newham Council         | 1.5             | 0.15            | -1.35         | -90%            |
| London Borough of Richmond upon Thames   | 3               | 2               | -1            | -33%            |
| London Borough of Southwark              | 1.8             | 5               | 3.2           | 178%            |
| London Borough of Tower Hamlets          | 5.5             | 3               | -2.5          | -45%            |
| London Borough of Wandsworth Council     | 0               | 4               | 4             | 400%            |
| <b>SUB TOTAL - INNER LONDON</b>          | <b>66.3</b>     | <b>70.6</b>     | <b>4.3</b>    | <b>6%</b>       |
| <b>OUTER LONDON</b>                      |                 |                 |               |                 |
| London Borough of Barking and Dagenham   | 1               | 0               | -1            | -100%           |
| London Borough of Barnet                 | 3               | 1.8             | -1.2          | -40%            |
| London Borough of Bexley                 | 0.7             | 0.4             | -0.3          | -43%            |
| London Borough of Brent                  | 0.1             | 1               | 0.9           | 900%            |
| London Borough of Bromley                | 2               | 1               | -1            | -50%            |
| Croydon Council                          | 1               | 1               | 0             | 0%              |
| London Borough of Ealing                 | 4               | 1               | -3            | -75%            |
| London Borough of Enfield                | 1.5             | 3.6             | 2.1           | 140%            |
| Haringey Council                         | 4               | 2               | -2            | -50%            |
| London Borough of Harrow                 | 1               | 1               | 0             | 0%              |
| London Borough of Havering               | 2.5             | 1               | -1.5          | -60%            |
| London Borough of Hillingdon             | 2.5             | 2.7             | 0.2           | 8%              |
| London Borough of Hounslow               | 1               | 1               | 0             | 0%              |
| Royal Borough of Kingston upon Thames    | 0.5             | 0               | -0.5          | -100%           |
| London Borough of Merton                 | 1.5             | 0.6             | -0.9          | -60%            |
| London Borough of Redbridge              | 1               | 0               | -1            | -100%           |
| London Borough of Sutton                 | 0.1             | 0               | -0.1          | -100%           |
| London Borough of Waltham Forest         | 1               | 1               | 0             | 0%              |
| <b>SUB TOTAL - OUTER LONDON</b>          | <b>28.4</b>     | <b>19.1</b>     | <b>-9.3</b>   | <b>-33%</b>     |
| <b>TOTAL - LONDON</b>                    | <b>94.7</b>     | <b>89.7</b>     | <b>-5</b>     | <b>-5%</b>      |

*Data is collected for Historic England by the Institute of Historic Building Conservation and the Association of Local Government Archaeological Officers. The data is collated annually and most recently was published as the Seventh Report on Local government Staff Resources (<https://historicengland.org.uk/images-books/publications/seventh-report-la-staff-resources/> ).*