



Historic England

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By email: Richard.linton@london.gov.uk

23 June 2015

Dear Mr Murray,

Minor Alterations to the London Plan – Housing and Parking Standards

Thank you for the opportunity to comment on the proposed Minor Alterations to the London Plan concerning housing standards and car parking.

As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels in the planning process.

Overall, Historic England does not have any substantive comments on the Minor Alterations, or recommendations for amendments. We have set out our comments on the proposed changes for each document by way of points for information, which we hope you find useful.

Housing Standards

Historic England is satisfied that the London Plan policies contain important references to ensuring that new housing developments are of the highest quality in relation to their environment, taking account of local character. The changes do not impact on this requirement.

Specific comments:

- Space standards: The thrust of the housing policy is in respect of new-build housing. Where schemes involve adaptation and conversion of historic buildings to residential units we would expect the policies in Chapter 7 of the London Plan to come in to play relating to the conservation of the significance of heritage assets. Thus, in relation to listed buildings the need to ensure that the significance of the building is not harmed could strongly influence room and unit sizes.



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- Inclusive design: Historic England has prepared guidance entitled Easy Access to Historic Buildings. This is available on our website at: <https://www.historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/>. Historic England is engaged at national level in discussions relating to the integration of inclusive design into guidance and practice.

Parking Standards

In our response to the scoping for the Integrated Impact Assessment we noted that the provision of parking is a matter which can significantly influence the layout of new residential development, its character and quality. Higher parking standards may lead (though not in all cases) to front garden parking, or parking courts, and these are not necessarily appropriate to the character of historic areas, or the setting of heritage assets. While good urban design may overcome the challenge of reconciling increased parking with character and quality, the challenge to urban grain and historic values should be considered carefully.

English Heritage also notes that in larger residential developments underground parking provision may be proposed. While this may offer some urban design benefits the potential for impacts on the archaeological resource should be taken into account. The defined Archaeological Priority Areas are especially vulnerable to this type of development.

We do not have any specific comments on the proposed changes, other than that it will be important that the boroughs retain flexibility with respect to the implementation of parking standards so that the most appropriate provision can be made in the context of individual places, their historic values and townscape qualities.

Should you have any queries arising from these comments, please do not hesitate to contact me.

Yours sincerely

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