

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London SE1 2AA

February, 2018

Dear Sir,

Draft New London Plan

Thank you for the opportunity to comment on the New London Plan. This response is submitted on behalf of the Chartered Institute for Archaeologists (CIfA), by the CIfA London Area Group.

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,500 members and around 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CIfA's London Area Group has over 600 members practising in the public, private and voluntary sector across Greater London.

We welcome this opportunity to comment on the New London Plan which will guide the development of London for the near future. We support the aim of sustainable growth, and the contribution that our rich heritage can make to that. In particular we wish to broadly support the policies in Chapter 7: *Heritage and Culture* especially policy HC1: *Heritage Conservation and Growth*.

Archaeological resources are vulnerable to damage through development and land management, only a small proportion is formally designated, and much of their protection is based solely in the planning system. We are concerned that these protections are maintained in the face of the necessary growth of London. These undesignated historic assets, whether below ground remains or built structures, have the potential to inform planning policies, contribute to the creation of a sense of place, and engage and bolster communities old and new.

To this end, we recognise that Policy HC1 provides an overarching policy that should enable the management of archaeology and the broader historic environment throughout Greater London. The recognition of the role of the Greater London Historic Environment Record – a fundamental source for informed decision-making – is especially welcome. We also welcome the recognition that investigation must be undertaken by suitably-qualified individuals or organisations.

However, the historic environment can be read across the entirety of Greater London, and thus an appreciation and understanding of it, and its value in informing the broader sweep of planning policies, should be recognised. In particular SD1 the Spatial Development Pattern could integrate archaeological strategies into Opportunity Area Frameworks.

The natural environment, landscape and parks are all created from land management and incorporate human activities over many centuries and are an archaeological as well as natural resource. The Green Infrastructure Plan G3 should demonstrate the wealth of historic environment incorporated in our green spaces and woodlands. A similar consideration should extend to policies for mineral extraction (SI10) and burial grounds (S7).

The city's industrial past is well-represented by canals, docks, river structures, former industrial and military sites, and infrastructure such as bridges, railway lines, and roadways. These can have aesthetic, engineering, and historic value, and policies to manage them should demonstrate awareness of their importance.

We would also like to see the broad context of the historic environment, our understanding of how peoples have shaped the city we see today, and the contribution that understanding can make to our appreciation of place to inform management of growth, read across all the supporting Strategies that supplement the London Plan.

We would be happy further to discuss the issues raised in this submission insofar as they affect the historic environment. In the meantime, if there is anything further that we can do to assist please do not hesitate to contact us.

Yours faithfully,

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