

Respondent number: 621



Examination of the London Plan
Matter 15: Strategic and Local Regeneration
Historic England, Hearing Statement 2
3rd December 2018

Historic England is the principal Government adviser on the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

As a spatial development strategy, the legal duty relating to soundness set out in section 20(5)(b) of the Planning and Compulsory Purchase Act 2004 does not apply to the London Plan. However to ensure consistency with national policy the tests of soundness to be applied require that London Plan should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft London Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards to Matter 15: Strategic and Local Regeneration (policies GG1 and SD10) of the Local Plan which will be discussed in week 2 of the Hearings Programme (Weds 23 January 2019). This Statement has been prepared with reference to the Minor Suggested Changes to the draft London Plan (published 13th August 2018).
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Representations dated 1st March 2018

<https://www.london.gov.uk/sites/default/files/Historic%20England%20%28621%29.pdf>

Inspectors Questions: Spatial Development Strategy

Matter 15: Strategic and Local Regeneration

Would the Plan be effective in ensuring that development contributes positively to regeneration where it is needed and the building of strong and inclusive communities in accordance with Policy GG1? In particular

- a) **Would figure 2.19 provide an effective and justified strategic framework for the identification of regeneration areas in local plans and neighbourhood plans?**
- b) **Would Policy SD10 provide an effective and justified strategic framework for the preparation of (i) policies in local plans and neighbourhood plans and (ii) regeneration strategies and programmes?**

- 2.1 Regarding policy GG1, we are pleased to see that the Minor Modifications published on 13th August 2018 address our previous comments dated 1st March 2018. These changes better recognise the social value of heritage to local communities and the role it has to play in regeneration. We hope that the Panel will accept these amendments.

- 2.2 Figure 2.19 of the draft London Plan illustrates the Plan's Strategic Areas for Regeneration; these areas have been identified using Indices of Multiple Deprivation data (IMD). Historic England's recent publication "*Risky Business*" (February 2018) identifies a correlation between areas of deprivation and Heritage at Risk. The report demonstrates that investing in historic buildings at risk in London, and bringing them back into use, delivers regeneration and renewal in some of the most deprived communities in the country.

Improvements in and conservation of the historic environment brings an array of tangible and intangible benefits to local communities and can help achieve a range wider spatial planning goals. The benefits of investing in Heritage at Risk can deliver a diversity of regeneration outcomes, not just in terms of historic fabric but optimised use of space, job creation, economic gains, and enhancement of local facilities, educational and training opportunities helping to improve local distinctiveness and wellbeing for residents. The historic environment can often act as a catalyst for regeneration as comparatively small investments into historic buildings which may be redundant or problematic for example, can unlock transformational change by altering local perceptions, and in many cases restored heritage assets provide useful community and commercial venues.

- 2.3 In this context, the approach used in the draft London Plan to help local authorities identify strategic and local regeneration areas should support the delivery of a positive strategy for the conservation and enhancement of the historic environment.

Risky Business is available here: <https://historicengland.org.uk/whats-new/in-your-area/london/investing-in-london-heritage-at-risk/>

- 2.4 The NPPF encourages an innovative approach to renewal with a focus on strategic policies to ensure that regeneration is delivered in an integrated way. Policy SD10 adequately considers the historic environment throughout and provides an effective strategic framework for the conservation and enhancement of the historic environment. Specifically we welcome the supporting reference in paragraph 2.10.5 which outlines the need for investment and development in Areas of Regeneration to enrich the qualities of the area that make it unique. We also welcome paragraph 2.10.6 which recognises 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, and heritage assets.

- 2.5 The law requires that Neighbourhood Plans must be in general conformity with the strategic policies in the adopted Local Plan for the area (and any other strategic policies that form part of the statutory development plan where relevant, such as the London Plan). We consider policy SD10 to be effective in this respect. The draft London Plan is based on sound, up to date evidence and in our view SD10 is justified. Notwithstanding our separate comments on M15 Opportunity Areas, Policy SD10 will ensure that Neighbourhood Plans and Local Plans (if prepared in conformity with SD10), will provide a positive strategy for the conservation and enhancement of the historic environment as required by paragraphs 7 and 126 of the NPPF.
- 2.6 Policy SD10 will be important in the formulation of regeneration schemes and programmes given that it will be a material consideration in the decision making process regarding associated individual developments. Local Plan development documents will also need to reflect the strategic policies of the London Plan. However, this will only be true for regeneration schemes and programmes introduced at the regional (Greater London) or Local levels.

Conclusion

- 3.1 In summary Historic England hopes that the amendments outlined within the Minor Suggested Changes to the draft London Plan (published 13th August 2018) are accepted by the Panel. The changes proposed will strengthen the Plan in heritage terms and will provide a more effective strategic framework for local plans, neighbourhood plans and regeneration schemes by ensuring that the conservation of the historic environment is pursued in coordination with other spatial planning goals.