

## DRAFT LONDON PLAN EiP 2019

### Regents Network response to the EiP Panel's Questions

#### Panel questions in brown colour

#### Session 18 Friday 8 March 2018

Morning session 9.30am

Matters M45-M47

[Heritage and Historic Environment, World Heritage Sites and London View Management Framework]

#### **Regents Network submission to Matter 45** *Conserving and Enhancing the Historic Environment*

##### Question:

M45. Would Policy HC1 provide an effective and justified approach to conserving and enhancing the historic environment?

Yes, HC1 certainly has a comprehensive and 'justified approach' to London's historic environment and heritage assets. Unfortunately the approach it requires (Para A for instance) does not appear to have been reliably 'effective' in the recent past, and perhaps implementation and respect for Policy HC1 may bring about a welcome change.

It is too often the case that development plans and strategies do not demonstrate "a clear understanding of the historic environment" (Para B). They may pay lip service to the heritage of a location and refer to its importance, and then carry out a development that disregards the significance and pre-eminence of the heritage asset, and the character and 'sense of place' of the location.

Regrettably, the influence for the sidelining of the character and heritage of an area or site is widely perpetrated, including by influence from above. The local authorities where the decisions are made are too often misguided by superior influences.

It is well said that "London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life" (Para 7.1.1).

The paragraph ends with the undertaking that the Mayor will develop a London-wide Heritage Strategy which will support "delivery of heritage-led growth".

This is the sort of initiative that London needs, and it is important that this LP emerging Heritage Policy is implemented in a direct and practical manner.

##### In particular:

- a) Would Policy HC1 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to the historic environment?

The Policy is well drafted and (mostly) well thought through, and if it is given full attention and consideration by the local authorities, it should make a most satisfactory framework for their local plans.

As the local plans are not very regularly updated, then the LA should refer directly to the new Draft London Plan, with particular note that they will be required to support delivery of heritage-led growth in their borough's development proposals as outlined in Policy HC1.

It is important that the LA has the heritage and character of sites and locations earmarked for development at the forefront of the development proposals, particularly the non-designated assets that are so regularly sidelined. These include a wide range of features including “buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and aged or veteran trees” (Para 7.1.2).

b) Would it provide sufficient detail to guide London boroughs in developing evidence that demonstrates a clear understanding of London’s historic environment?

Para 7.1.2 as quoted above is most helpful in focussing on a wide range of features, assets and landscapes within an area (Para A), and their interpretation, and which will give a clear and wide-ranging understanding of their importance.

It is helpful that ‘canals, docks and waterways’ are mentioned as it has been distressing that London’s waterways have been seriously sidelined. It is worrying that the River Thames, one of the most famous rivers in the world, is sidelined and seriously exploited by unsuitable development.

Waterside developments take great benefit by being located beside a waterway, but all too often they give nothing back. Property development along waterways is not opposed, but it should be scaled and designed to suit the heritage, environmental character and open space requirements of the waterway.

The same applies to London’s canals which are a 100 mile section of the thousands of miles of a man-made canal network around the country, and so the GLA and London boroughs have responsibility of caring for and treasuring part of a national heritage asset. The manner in which the canals in London are allowed to be badly treated by the planning authorities disregarding policy and requirements (GLA as well as LA) is unacceptable. This is a good example of how our heritage should not be treated, and there is hope that an enlightened GLA will emerge, and show an exemplary example to the boroughs in following the London Plan policies for our waterways.

A ‘clear understanding’ and implementation of Policy HC1 would be most welcome.

c) Would the approach to development management be effective, justified and consistent with national policy in relation to designated and non-designated heritage assets?

Nothing that the NPPF says about heritage (Chapter 16) contradicts or negates the information and text of the Draft London Plan Policy HC1. However, the thrust of the NPPF is focussed on the top end of heritage – World Heritage Sites, listed buildings, registered parks and gardens and scheduled monuments.

The civil servants who drafted the NPPF should get out more, and recognise more directly not only the national value of ‘high heritage’, but local assets and environment, and what the London Plan says “makes London a vibrant and successful city” (Para 7.1.1).

However, the requirements, suggestions and recommendations of the NPPF can readily be applied to a wide range of London’s diverse range of designated and non-designated heritage assets. It is helpful and profound to that extent.

#### Something to think about

The emerging ‘agent of change’ principle needs to be implemented. It is promoted well by GLA, and now should be upheld in relation to the dominance of development – including beside the canals and waterways. It can be initiated widely without retarding development. It is just that

development should be carried out in a different manner, more sympathetically to the neighbourhood and heritage, and character of the location.

The 'Agent' of the change would be a developer of a proposal which may have an effect on the character and nature of a location. If it is considered to be a negative effect, then it could be up to the developer to mitigate the effect on the location or setting.

It should be noted that the NPPF (Para 182) states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs), and refers to 'agent of change'.

A consideration for the future would be to enshrine into planning law the 'agent of change' principle in a widened sense. That should give the Mayor and GLA something to think about.

Del Brenner  
Regents Network and  
associate of London Forum and Just Space

**1,130 words**