

DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

Written Statement

Matter	M45 – Conserving and Enhancing the Historic Environment
Respondent Number	2776
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QUESTION:

M45. Would Policy HC1 provide an effective and justified approach to conserving and enhancing the historic environment? 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?
- b) Would it provide sufficient detail to guide London boroughs in developing evidence that demonstrates a clear understanding of London’s historic environment?
- c) Would the approach to development management be effective, justified and consistent with national policy in relation to designated and non-designated heritage assets?

RESPONSE:

London’s historic environment is hugely important to the identity of the City. We believe its conservation and enhancement is key to ensuring London remains a world leading city which continues to attract talent and encourage growth.

Nonetheless, in relation to question c) and Part C of the policy, the modification from ‘seeking to avoid harm’ to ‘avoiding harm’ goes against the approach of NPPF which properly reflects the potential acceptability of assessed heritage harm in the context of a wider planning balance – established also through case law.

Paragraphs 193 to 197 of the NPPF set out a systematic and graded approach to the appropriate planning test, according to the degree of harm.

The policy should be re-framed to reflect scope for such opportunities to be brought forward as part of development proposals, rather than just waiting for individual boroughs to identify specific opportunities and encourage others to be involved later.



U+I's commitment to place-making already puts history at the heart of our regeneration schemes across the City, finding viable new uses for heritage assets and placing them in enhanced settings. We take the time to understand the history, character and culture of our sites and reflect these in our schemes.

For our Deptford Market scheme, U+I restored the 'at risk' listed station ramp – the oldest railway structure in London - in line with Criterion E as part of a PPP scheme with LB Lewisham.

In partnership with the Railway Heritage Trust, the arches which were used as air raid shelters during WW2 have been converted into commercial space for a variety of independent and high street businesses.

A historic bomb shelter sign was also restored with the site's heritage taking front and centre of our re-development plans. This approach led U+I to Winner of the 'Best Heritage Led Project' at the 2017 London Planning Awards and the Placemaking Award at the 2017 Property Week Awards.

The Old Vinyl Factory in Hayes demonstrates how successful private initiatives to deliver homes and jobs within a heritage setting – and using heritage interests in place-making – can be.

POLICY AMENDMENT:

The draft policy should therefore be reworded as:

Policy HC1 Heritage conservation and growth

*C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should **seek to** avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*