

Respondent number: 621



Examination of the London Plan
Matter 89: Town Centres and Retailing
Historic England, Hearing Statement 12
26 February 2019

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 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 Inspectors' questions with regards to Matter 89: Town Centres and Retailing which will be discussed in week 11 of the Hearings Programme (Wednesday 15th May 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 London Plan.

Representations dated 1st March 2018

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

Inspectors Questions: Town Centres

Matter 89: Retailing and Town Centres

Would policies SD6, SD7, SD8, SD9 and E9B provide an effective strategic framework for the preparation of local plans and neighbourhood plans relating to town centres and all types of main town centre use development (including bulky goods retailing), that is consistent with national policy.

- 2.1 The challenges facing the retail sector are impacting London's historic town centres and high streets. Effective conservation of the historic environment can help reinforce the role and function of high streets and town centres as the centre of community activities and a healthy retail economy. Many town centres are historic in origin and often retain historic land uses (e.g. pubs, market places, shops), clusters designated and non-designated heritage assets such as historic buildings, street furniture, shop fronts, hard standings such a pavements kerb stones etc. All of these features help establish a sense of identity and create a pleasant environment to be in. When managed successfully the historic environment of town centres and high streets can help encourage people to visit, spend time in and use the high street. We are pleased to see that paragraph 2.6.1A acknowledges this.
- 2.2 Over time London's high streets have become the heart of communities and their historic character is fundamental to their contribution to peoples' and communities' sense of identity. We are pleased to see that Policy SD6 part a) recognises the role of heritage in town centres and high streets in establishing and retaining a sense of place and local identity and seeks development that complements local character and heritage assets. We support policy SD6 and consider that it will be effective as a framework for local plans and

neighbourhood plans which will be encouraged to include positive, proactive town centre and high street policies tailored to local circumstances and character.

- 2.3 Policy SD7 (previously SD8) provides direct guidance on the types of policies that should be included in development plans at the local level. We are pleased to see that part 4) point h; and part 5) point c, makes specific reference to the need for intensification to complement local character and heritage assets. It would be helpful however if such criteria were applicable to all types of town centre and high street schemes regardless of scale and level of intensification (at present part 4) relates only to areas where specific growth and intensification are to be focused). This will more explicitly outline the expectations for local plans and neighbourhood plans.
- 2.4 Ill managed growth and intensification can overwhelm town centres and so we welcome part h) of policy SD8 (previously SD7) as it encourages developers to see the opportunities that the historic environment provides when creating successful places where people want to live, work and visit. Historic town centres and high streets naturally lend themselves to mixed uses with many having residential accommodation on the upper floors above shops and commercial units on the ground floor. This mixed use could continue to inspire High Street renewal and ensure it remains an active place at all times of day, particularly for cultural uses, which is recognised by SD6 part f).
- 2.5 Through our Heritage Action Zone initiative (in London we are working in Sutton and Walworth), we are working to unleash the power in England's historic environment to create economic growth and improve quality of life in villages, towns and cities. This, in combination with our new High Street Heritage Action Zones, helps deliver the government's increased national focus on High Street protection and renewal. In our view the draft policy reinforces the aspiration to facilitate the revival of London's high streets and town centres. The proposed draft policy is much improved from the current adopted policy and has indeed been informed by many of our comments on sensitive historic town centres raised in relation to the GLA's Further Alterations to the London Plan (FALP) work. This includes our comments on town centre classifications which have been updated in places to reflect our concerns about certain town centres which particularly rich historic character being targeted for major change. The draft policy recognises the changing circumstances of the built environment and its priorities; as such an improved policy is not only welcomed but necessary.

Conclusion

- 3.1 In summary Historic England supports the town centre and high street policies and the amendments outlined within the Minor Suggested Changes to the draft London Plan (published 13th August 2018). We respectfully encourage the Panel to accept these. We note that there are opportunities to further enhance the effectiveness of this policy in relation to the historic environment, however consider that the policy and changes proposed will form an important part of the Plan's positive strategy for the historic environment (NPPF

paragraph 126) and will provide a more effective strategic framework for local plans, neighbourhood plans and regeneration schemes.