



Historic England

Lambeth Council  
Planning Policy  
PO Box 734, Winchester  
SO23 5DG

Our ref: PL00016928  
Date: 29/03/2021

By email: [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

Dear Planning Policy Team

**Re: Draft Revised Lambeth Local Plan 2020, post-EiP Schedule of Main Modifications for Consultation**

Thank you for consulting Historic England on the Local Plan's Main Modifications. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

These comments have been written in response to the most recent issue of modifications, ref. *Schedule of potential changes updated 4 December 2020, with Inspector Response January 2021.*

**Comments:**

**Mod PC072:** Paragraph 9.37 – we support this modification to include reference to Historic England's advice notes on sustainable design and construction.

**Mod PC086:** Paragraph 10.97 (ii) – we support this modification to include reference to sustainable construction and design.

**Mod PC087:** Paragraph 10.112 – we support this modification to include reference to Historic England guidance on best practice, and to highlight that double glazing will be assessed on a case by case basis.

**Mod PC222:** Policy Q23 (c) – We support this modification to include a policy criterion in relation to archaeology. This ensures the policy conforms to the London Plan in respect of archaeology.

**Mod PC223:** Paragraph 10.128 – We support this modification to refer to the inclusion of Archaeological Priority Areas on the policy map.

**Mod PC226:** Policy Q26 (b) – We do not support this modification and maintain the position set out in our Statement of Common Ground. Part B of the policy undermines the newly adopted London Plan, which is very clear that tall buildings should only be developed in



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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areas identified as appropriate in development plans. It is our view that the policy (as modified) does not align with the London Plan (particularly D9.B.2; D9.B.3; 3.9.2) which is clear as to where tall buildings should and should not be planned. The modification does not overcome our concerns regarding the unplanned development of tall buildings throughout the borough.

The proposed policy could easily be misinterpreted and so poses a risk to heritage, and therefore it is not something we can support. The emerging London Plan tells us that tall buildings can make a positive contribution to London's cityscape *if* they are in the right place, equally they can have detrimental impacts in inappropriate locations. It is therefore reasonable to expect the Council to set a clear direction in this respect and not to leave such a strategic issue, of importance to the character of London as a whole not just Lambeth, to planning application stage. Part B provides a degree of policy support for tall buildings outside the areas identified as appropriate. The absence of part B in the plan does not preclude speculative applications coming forward, and if such applications have material considerations that justify a departure from the development plan then those applications can still be approved. The inclusion of Part B however is an unnecessary risk and adds confusion contrary to NPPF 16.D which tells us that policies should be clearly written and unambiguous. The policy as amended would not be effective, nor would it align with the London Plan and is therefore unsound.

Since the EiP the Secretary of State has issued a new direction regarding London Plan policy D9, stating *"In my view we should go further and I am issuing a further direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital,"*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/943243/201210\\_Letter\\_to\\_Mayor\\_London\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943243/201210_Letter_to_Mayor_London_Plan.pdf) Part B is contrary to this view.

In summary, Part B risks harmful development, and does not set out clearly defined areas where tall buildings could be brought forward.

**Map 12:** We are concerned about the inclusion of an immediate setting boundary for the Westminster World Heritage Site (WWHS). The 2015 local plan policy map on the website is faulty and does not load, nor does there appear to be a submission version of the policy map in the examination library, so it is not possible to compare what has been submitted and what is now proposed. The inclusion of Map 12 was not discussed with Historic England in the course of the plan's preparation. In principle however, we do not consider it possible or appropriate to attempt to define setting on a map. The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. While setting can be mapped in the context of an individual application or proposal, it



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cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset. Furthermore, it is not clear what the approaches are intended to indicate or how they are to be as a factor when deciding development proposals. Our advice is that the immediate setting and approaches are removed from Map 12 as they are unhelpful and would potentially be harmful.

The WWHS purposefully does not have a buffer zone because it has been acknowledged that it would be too complex and may not provide the protection desired, for example tall buildings outside the identified zone causing harm to longer views. Furthermore, it is not clear if the introduction of the setting boundary has been developed in consultation with the WWHS Steering Group, to develop this unilaterally is of concern. Any buffer zone/setting boundary would need to be underpinned by detailed evidence and that evidence would need to be tested before anything could be agreed.

We hope that these comments are helpful, and we would be happy to discuss anything further.

Regards

Katie Parsons  
Historic Environment Planning Adviser  
Head of Planning Strategy and Heritage Reform  
[Katie.parsons@historicengland.org.uk](mailto:Katie.parsons@historicengland.org.uk)



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