



Historic England

Examination of the Lambeth Local Plan

Matter 5, Social Infrastructure

Historic England, Hearing Statement

05/10/2020

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting 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.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local 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 Matter 5 Social Infrastructure, of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Matter 5 – Social Infrastructure

Are policies S1-S3 positively prepared, justified, effective and consistent with national policy?

Question 5.3

New or improved social infrastructure: Should libraries be added to the list in policy S2 (new or improved social infrastructure)? If so, presumably this should be reflected in the IDP. Does policy S2, and the proposals for Site 1 (Land north and south of and including 10 Royal Street, SE1 [Founders Place]) adequately cover the requirements for new and improved health care facilities in the Borough? In particular, in policy 2, Site 1, Design principles and key development considerations, (iii), is the proposed restriction on building heights in the southern half of the site appropriate in view of its location within the Conservation Area and proximity of Archbishop's Park?

- 2.1 Historic England would not generally comment on issues relating to social infrastructure. However as the Inspector has raised a specific question regarding the policy's Design Principles that relate to the historic environment, we wish to offer the following comments to help aid the Inspector's decision

making. Our statement relates to the last point of the question only (the underlined section above).

2.2 Archbishop's Park is recognised within the local plan as an historic park and garden and forms part of the setting of Lambeth Palace and its associated designed landscape, having formed part of its grounds until being laid out as a public park in 1901. Grading the scale of building heights so they step up and away from the Palace, will help conserve important elements of its setting as it relates to Archbishop's Park. The southern part of the site is currently occupied by low density, single story development and MUGA sports areas. While neutral, this development is unobtrusive and relates relatively well to the park. Limiting the height of future development is suitable in this context. The northern part of the site across Royal Street is already significantly taller and different in character to the southern portion of the site. The northern section could suitably accommodate taller development. It should be noted that the Waterloo Buildings Height Study (2018) has tested the northern part of the site and concluded that a height of 50 AOD should be a maximum (see Appendix 3, Map 2, and site 8 conclusions on page 11).

2.3 The Design Principles are based on a robust, up-to-date evidence base, and so are justified. We draw the Inspector's attention specifically to the following documents:

- Lambeth Palace Conservation Area Character Appraisal¹ (March 2017)
- Waterloo Building Heights Study² (2018)
- While not forming part of the examination library, the Waterloo Area SPD³ is relevant

¹ Exam ref EB 75, Lambeth Palace CAA 2017, <https://www.lambeth.gov.uk/sites/default/files/pl-lambeth-palace-character-appraisal-2017.pdf>

² Exam ref EB 85, Waterloo Building Height Study, 2018
https://www.lambeth.gov.uk/sites/default/files/pl_Waterloo_Building_height_study_2018.pdf

³ Waterloo Area SPD, April 2013 https://www.lambeth.gov.uk/sites/default/files/pl-Waterloo%20Area%20SPD%20-%20Adopted%202013_0.pdf

- 2.4 The evidence base is recent and post-dates the 2015 adopted plan. The evidence provides a strengthened argument for the Design Principles, and we consider that there is little justification to dilute these.
- 2.5 There is no evidence to suggest that this site policy should not set parameters for building heights in the interest of conserving the historic environment. The parameters set the boundaries for developing the site sustainably as defined by the NPPF, which includes conserving or enhancing the historic environment. The setting of design principles to guide the development of the site sustainably aligns with the NPPF's aspirations; the emerging London Plan's objective of delivering good growth; and helps build in certainty and clearly indicates how a decision maker should react.

Conclusion

- 3.1 The policy as it relates to Site 1 is based on evidence so is justified; it sets clear guidance for the development of the site and so will be effective; it addresses heritage issues from the outset and so provides a positives strategy for the conservation and enhancement of the historic environment; the design principles provide guidance on how the site can be developed sustainably; the design principles ensures that the setting of heritage assets is considered upfront at plan-making stage; the policy aligns with national policy, the London Plan, and national legislation in this respect. We consider design principle iii) to be appropriate.