



Historic England

Examination of the Lambeth Local Plan
Matter 9 – Places and Neighbourhoods
Historic England, Hearing Statement
02/10/2020

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 9 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 9 – Places and Neighbourhoods

Are the following policies positively prepared, justified, effective and consistent with national policy?

- 2.1 We have the following comments to make on sites with particular heritage sensitivities. The sites in question are all allocations carried over from the adopted plan (2015). The issue then is whether any potential changes to the policies would reduce heritage protection. There is little scope to seek improvements given that the allocation policies as written have already been sound.
- 2.2 Annex 11 identifies broad areas of search that may be appropriate for tall buildings, these are not allocations (see Topic Paper 8 4.1 and 4.2¹). The fact that these are not allocations could be made more explicit throughout the plan. This is mentioned at several points but could be brought out more to avoid any misinterpretation. PN2-N makes it clear that any tall building proposals that may come forward within these areas will only be considered appropriate subject to the impact upon the setting of heritage assets.

¹ Exam ref TP 08, Topic Paper 8: Tall Buildings
https://www.lambeth.gov.uk/sites/default/files/pl_Topic_Paper_8_Tall_Buildings_2019.pdf

Question 9.1 – Policy PN1

PN1 General

- 2.3 Historic England is supportive of this policy, and considers it to be positively prepared, justified, effective, and consistent with national policy. Parts vii); e); and h) i, v, vi, vii, viii seek to conserve local character, views, particularly importance designated heritage assets, including the Westminster World Heritage Sites, and conservation areas. These policy criteria are appropriate, and will help ensure the delivery of development that is sustainable as defined by the NPPF.

PN1 - Site 9

- 2.4 Site 9, ITV Centre - The policy identifies relevant nearby heritage assets and sets out helpful design principles. The policy requires a contextual approach, refers to historic wharf character, and sets out that higher elements should be away from riverside. These principles aim to conserve the historic environment. The policy is positively prepared, justified, effective, and in conformity with national policy. We are content with the policy as written, and consider it to be sound.

Question 9.2 – Policy PN2

PN2 general

- 2.5 Historic England is supportive of this policy, and considers it to be positively prepared, justified, effective, and consistent with national policy. PN2.L provides support for development that is appropriate to the distinct character areas of Vauxhall. It also emphasises the need to enhance the character and appearance of Albert Embankment which demonstrates a positive strategy to tackle the harm created by past developments.

PN2 –Site 10

- 2.6 Site 10, 8 Albert Embankment (8AE) - the policy is based on sound evidence and seeks to conserve historic significance. The policy as drafted seeks to avoid harm in the first instance, and sets out a positive strategy for the conservation of the historic environment as required by NPPF 185. We consider that the policy is positively prepared, justified, effective, and in

conformity with national policy. We are content with the policy as written, and consider it to be sound.

- 2.7 It is noted that Regulation 19 representations made by other parties propose amendments to policy PN2-Site 10 to reflect the particulars of a live planning application. The application in question has been called in by the Secretary of State and no decisions have been made. We consider that the policy should not be amended to reflect the live application.

PN2 - Site 11

- 2.8 Site 11, Keybridge House – the policy identifies relevant heritage assets and contains design principles that requires development to protect the setting of adjacent Vauxhall CA and the unlisted St Anne's Church. There is also a requirement to ensure building heights reflect transitional location between new taller buildings towards river and lower-rise residential to south. The policy is based on sound evidence and seeks to conserve historic significance. We consider that the policy is positively prepared, justified, effective, and in conformity with national policy. We are content with the policy as written, and consider it to be sound.

PN2 Site 12

- 2.9 Site 12, Wandsworth Road/Parry and Street/Bondway – the policy identifies two GII listed buildings, and includes a further reference to support for their retention. The policy is based on sound evidence and seeks to conserve historic significance. We consider that the policy is positively prepared, justified, effective, and in conformity with national policy. We are content with the policy as written, and consider it to be sound.

Question 9.7 – Policy PN7

PN7 Site 18

- 2.10 Site 18, West Norwood, and Tulse Hill – the policy makes reference to development being of a scale appropriate to context and local heritage assets. West Norwood cemetery identified as a major historic asset and potential visitor attraction. West Norwood identified as a 'Cultural and Heritage Area'

with supporting measures that includes requiring development to be appropriate in scale and form with regard to the cemetery and the listed buildings within it. With regards to Tulse Hill, the policy requires development to avoid harm to local important views or the setting of heritage assets.

The policy is based on sound evidence and seeks to conserve historic significance.

Question 9.8 – Policy PN8

- 2.11 Kennington/Oval – the policy makes reference to ‘supporting and enhancing the heritage quality’ of the CA, Kennington Park and St Mark’s Church. This is a positive requirement which we support.

Question 9.9 – Policy PN9

- 2.12 PN9 Herne Hill – the policy makes reference to enhancing sense of place and historic character. This is a positive requirement which we support.

Conclusion

- 3.1 Policies PN1 –PN10, are policies relating to sites already in the adopted plan. As written they consistent with national policy and the London Plan. We consider the plan to be justified given the robust evidence base; in conformity with national policy; effective due to its clear expectations, and positively prepared with a focus on enhancement and consideration for the delivery of growth that also ensures the conservation of the historic environment. In our view these policies are sound as defined by NPPF 35. We do not consider there to be sound evidence to remove any existing design principles that are intended to guide development so that it conserves the historic environment.