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Our ref: PL00016928
Date: 11/03/2020

By email: localplan@lambeth.gov.uk

Dear Local Plan Team,

Re: Lambeth Council Draft Revised Local Plan Proposed Submission Version January 2020 (Regulation 19)

Thank you for your notification of the revised Regulation 19 submission document. 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. Therefore we welcome the opportunity to comment on the draft document. I have provided a summary of our advice below and more detailed comments in Appendix 1. These comments have been formed in line with the NPPF (2019) and with reference to draft New London Plan¹ which will become part of the Borough's development plan when adopted.

Historic England Advice

- The draft plan represents heritage well throughout. The approach to the strategic site allocations within the plan is clear and well evidenced.
- Where sites have been allocated more detail could be included in the development requirements to provide a clearer direction for both decision makers and applicants.
- We welcome the plan's commitment to producing a Heritage Strategy. We would be happy to comment on early drafts of this.
- We recommend that policy EN4 on sustainable design and construction is amended to make reference to how historic buildings should be approached.
- There is still concern as to how policy Q26 on Tall Buildings can be reconciled with draft New London Plan policy D9 and NPPF paragraph 16. We advise that part b) of policy Q26 is deleted and that additional sites are instead brought forward in a planned way as part of the forthcoming site allocation SPD. The inclusion of part b) is not in alignment with the draft New London Plan Policy D9 or NPPF paragraph 16 d). This is the only outstanding reason why we would consider the plan to be unsound.

¹ At time of writing this is the Intend to Publish version (dated December 2019) available: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>





Historic England

We have produced a number of detailed Good Practice Advice and Advice Note documents that we recommend you review as part of your plan preparation process:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

The Setting of Heritage Assets - Good Practice Advice in Planning 3

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

In preparation of the forthcoming plan, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

I hope that these comments will be helpful. I am happy to comment on any evidence documents or assessment methodologies before the next version of the plan is published. This applies to the anticipated site allocation DPD as well.

Regards

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Correspondence or information which you send us may therefore become publicly available.



Appendix 1: Detailed Advice

Heritage is well represented across the spatial strategy, vision, issues and strategic objectives laid out in sections 2 and 3 of the plan. The historic environment is considered in a locally specific way, and the plan recognises the links between the conservation of the historic environment and wider spatial planning goals such as cultural development, local distinctiveness, good place-making and successful economic regeneration.

Policy ED9 Public Houses

Public Houses have become particularly vulnerable over recent years and have been closing in high numbers. The adverse impacts stemming from their loss have become more apparent and better understood. We therefore support the inclusion of this policy which seeks to tackle these issues. We are pleased to see that it recognises the heritage importance of pubs and the role they have to play in helping to maintain a sense of local distinctiveness, character and vitality. We note that the marketing periods have been extended to reflect that which is set out in draft New London Plan Policy HC7 which we support.

Policy EN4 Sustainable design and construction

Historic England support measures to improve energy efficiency and climatic environmental conditions. We recommend that this policy makes reference to historic buildings which may require a different approach to adaptation. Standardised adaption measures can adversely affect historic fabric, the character and appearance of historic areas, and can reduce the environmental performance of historic buildings. However, at present the policy does not recognise the risks posed to the historic environment, and make no distinction between historic buildings and modern development.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. In developing the plan you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf/> to be helpful in understanding these special considerations.

A balanced well-informed, iterative approach is essential to upgrading historic buildings to reduce energy consumption and carbon emissions. The plan should set out the need for current environmental performance to be analysed in the first instance in order to support

proposals affecting heritage assets. It is also critical that any proposals are based on a sound understanding of the pathology and construction of the existing building using a “whole house” approach so that measures best suited to individual buildings and households (which take human behaviour into consideration as well as the building envelope and services) can be identified. Once analysis has been undertaken an iterative approach is recommended, beginning with management of the buildings and non-invasive measures before moving on to physical interventions.

It is important that historic assets are not seen a constraining factor, but as a valuable aid to achieving sustainable development. For example historic buildings represent a significant investment of expended energy. Demolishing and replacing these historic structures would also require a major reinvestment of embodied energy and other resources. Therefore encouraging the reuse of existing historic buildings and spaces can help achieve sustainable development. The plan could recognise that the beneficial re-use of existing buildings is a sustainable approach in its own right.

Section 10

Section 10 contains a suite of robust, detailed, and locally specific built environment policies which consistently contain development criteria that will safeguard and enhance the historic environment. These policies emphasise the importance of character, townscape, shop fronts, architectural detail, quality and durability of materials, planting, and street trees in relation to heritage. We support the policies set out in Section 10 and welcome Council’s commitment to produce a Historic Environment Strategy in Policy Q18.

Policy Q19 World Heritage Sites

We strongly support this policy which has been strengthened in response to the UNESCO/ICOMOS Monitoring Mission Report of 2017. This policy helps demonstrate the Council’s positive strategy for the historic environment by proactively seeking to address negative elements to improve the setting of the Westminster World Heritage Sites (WWHS). The 2017 report, alongside those from 2008 and 2011, has been used to evidence this policy.

Policy Q26 Tall Buildings

We remain concerned that part b) of this policy undermines a plan-led approach to tall building development. The most straight forward step to take would be to remove part b) from the policy. The absence of part b) does not preclude speculative applications coming forward, but at the same time does not encourage them as it currently could be interpreted as doing. The tall building topic paper sets out the rationale behind part b) which is that the Council does not wish to preclude tall buildings outside identified areas. This approach does not align with New London Plan policy D9 which clearly states that tall buildings *should only* be developed in locations identified in development plans as being suitable.

The thrust of the New London Plan is to resist tall buildings coming forward in a way that is not plan-led. Additionally, our revised Advice Note 4 on Tall Buildings (currently out for

consultation²) reinforces the importance of a plan-led approach to their development. I understand from discussions that the reason the Council wishes to do this is allow taller buildings in less sensitive areas such as some the estates which are already characterised by tall buildings and where large amounts of affordable housing can be delivered. If this is the case could these sites come forward in a plan-led way as part of the forthcoming DPD? The inclusion of additional areas suitable for tall buildings with specific development criteria to require the desired levels of affordable housing would be a more effective way of securing the Council's aspirations. Part 8.2 of the topic paper already suggests this as an approach. There does not seem to be any benefit therefore of including a policy criterion which actively builds in ambiguity, and which conflicts with both NPPF paragraph 16 part d) and the draft New London Plan. If the Council feels that there are sites that can still be identified as appropriate for tall buildings then they should be tested, evidenced and expressed in the site allocations SPD.

Site allocations

The plan allocates strategic sites, many of which have been carried over from the adopted plan. The draft plan would be strengthened by providing more detail with regards to the development requirements set out in the site specific policies. Making these improvements will better guide how decision makers should react to proposals, while providing more certainty about what is expected from new developments for applicants in line with NPPF paragraph 16.

Annex 11: Areas Suitable for Tall Buildings

The plan clearly shows where tall buildings will be suitable and these locations have been well evidenced by a series of tall buildings studies and a Topic Paper. As discussed above we advise that corresponding policy Q26 be amended to prevent the approach set out in Annex 11 being undermined.

² <https://historicengland.org.uk/content/docs/guidance/tall-buildings-hean4-consultation-draft/>