



ENGLISH HERITAGE

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Dear

London Borough of Hammersmith & Fulham: Scoping Report for the Sustainability Appraisal of the Local Plan

Thank you for the opportunity to comment on the Scoping Report for the Sustainability Appraisal for the London Borough of Hammersmith and Fulham's Local Plan. As the Government's adviser on the historic environment, and a statutory consultee for the Strategic Environmental Assessment (SEA) of plans, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local plan-making process.

We have reviewed the Scoping Report in light of the National Planning Policy Framework (NPPF) and its Core Principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

In the bullet points on page 20 of the Scoping Report, that refer to the key findings of the analysis of plans and programmes, the key message for the historic environment is described as: Conserving and enhancing the historic built environment of the borough wherever appropriate to do so. English Heritage respectfully suggests that this places a subtly different, and inaccurate, emphasis on 'where appropriate' than is envisaged by the NPPF. The appropriateness in the NPPF relates to finding the right way to protect the significance of heritage assets rather than being applied to whether that significance should be protected or not. Consequently, English Heritage requests that the bullet point is contracted to simply "conserving and enhancing the historic environment of the borough" or replaced with "conserving and enhancing the borough's heritage assets in a manner appropriate to their significance".

English Heritage welcomes the Scoping Report's coverage of the topic of "Improving the Quality of the Local Environment". In the section on "Improving Parks and Open Spaces", English Heritage requests that Registered Parks and Gardens of Historic Interest are included, as the borough definitely has some of these – for example Fulham Palace's gardens, and Bishops Park.

English Heritage requests that the particular archaeological value of the River Thames is recognised in the section on Increasing Access and Use of the River Thames and Grand Union Canal. We note and appreciate the recognition of the Canal's heritage value.

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English Heritage notes that all of the Sustainability Issues appear to be framed more as objectives. We would expect issues to more explicitly target areas of concern such as how to integrate the substantial amount of new housing required in a manner that is compatible with the conservation and enhancement of the borough's heritage assets and their settings. English Heritage observes that if the issues are not addressed this way it is harder to be certain that the plan is tackling them.

English Heritage notes that the Sustainability Appraisal Framework includes a heritage specific objective – i.e. improve the local environment and heritage. We request that the objective address the matter of setting and note that the first sub-objective is more effective in our opinion than the objective as currently framed, albeit still needs to incorporate the setting of heritage assets as this is a matter for management according to the NPPF.

In relation to indicators, English Heritage welcomes the indicator concerning conservation area statements. We request, however, that the building at risk indicator is expanded to include Heritage at Risk as this is what we measure with our Heritage at Risk Register.

English Heritage considers that the matrix that sets out the compatibility of the proposed sustainability objectives looks broadly correct and we consider the commentary on these relationships reasonable. We note that where the sustainability objectives are tested against the local plan objectives, it is clear that the vast majority of local plan objectives are going to need very careful implementation in order to remain in step with the Heritage Sustainability Appraisal Objective. We consider it valuable that this is clearly identified in the Scoping Report and would welcome all opportunities to work with the borough towards ensuring that its objectives are achieved in a way that sustains its historic environment.

Finally, it must be noted that English Heritage strongly advises that the local authority's conservation staff be involved throughout the preparation and implementation of the Local Plan and the Environmental Statement, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment. Furthermore, we must state that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Local Plan, and which may, despite the SA, have adverse effects on the environment.

Yours sincerely



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