

HAMMERSMITH AND FULHAM HISTORIC BUILDINGS GROUP

Chairman: Nicolas Fernley, cnfernley@yahoo.com tel: 07757034203

399 Goldhawk Road, W6 OSA

Hammersmith & Fulham Proposed Submission Local Plan (PSLP), Examination June 2017

Statement to the Examination of the PSLP

(Reference Inspector's Question 6: 'Design, Conservation, Environmental Sustainability hearing scheduled for 21st June)

Introduction.

The Hammersmith & Fulham Historic Buildings Group (HBG) regularly responds to planning proposals and as part of the civic movement relies on the clarity of the planning definitions when arguing its case for conservation and respect for heritage. With the number of recent changes in planning policy and documentation, this need for clarity is even more important.

The HBG does not consider that the wording of the glossary definitions, (relating to Policy DC8ff Heritage and Conservation), 'Heritage Assets', Listed Buildings' & 'Local Buildings of Merit' are 'sound' (as defined by the Inspector in his 'Guidance Notes') because of variation in the wording from that in the National Planning Policy Framework 2012 (NPPF), leading to lack of clarity.

Proposals

1. The **Heritage Assets** definition varies from the definition in NPPF by adding an additional requirement that the assets should be 'positively identified'. This is an unnecessary addition and could lead to argument as to its meaning.

We propose the word positively is deleted

Wording in NPPF Glossary definition has been omitted referring to 'designated heritage assets'. We propose this wording is added.

The definition would then read:

'Heritage Asset is a building, monument, site, place, area or landscape ~~positively~~ identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority during the process of decision making or through the plan making process (including Local Listing).

2. The **Local Buildings of Merit** definition should make it clear that the Borough's Local Register of Buildings of Merit, often referred to as BOMs, is the Borough's name for its Local Listing.

We propose the words locally listed are added.

We propose that 'but not meriting Listed Building status' is deleted as unnecessary and in some cases inaccurate.

The definition would then read:

Local Buildings of Merit means locally listed buildings which are of local interest because of their townscape, architectural or historic interest ~~but not meriting Listed Building status~~.

Local List Availability We are concerned that there is no reference to where the Local List (ie Register of Buildings of Merit) is available to view. We appreciate that as the Local List may change in the lifetime of the Local Plan including it as an Appendix may not be suitable. However we suggest it should be signposted where the Local List can be viewed.

3. The Listed Buildings definition should be more informative. NPPF does not have a formal definition of listed buildings in its Glossary but they are referred to particularly in section 12 para 132.

We propose the words ...and can include the interior as well as the exterior of the building and any buildings or permanent structures within its curtilage are added

Listed buildings are 'designated heritage assets' and this should be stated for clarity

We propose the words Listed buildings are designated heritage assets are added.

The definition would then read:

Listed Building is a building or structure which is considered to be of 'special architectural or historic interest'. The definition of listed building is fairly wide and the term building may include a wide range of structures including bridges, milestones and follies and can include the interior as well as the exterior of the building and any buildings or permanent structures within its curtilage. Listed buildings are designated heritage assets.