



Historic England

LONDON BOROUGH OF HAMMERSMITH AND FULHAM LOCAL PLAN EXAMINATION

STATEMENT BY HISTORIC ENGLAND

ISSUE 2: REGENERATION STRATEGIES

Written submission

References:

National Planning Policy Framework 2012 and National Planning Policy Guidance

Hammersmith and Fulham Local Plan Submission Draft September 2016

Examination document M4 Schedule of Suggested Minor Changes, 28/2/17

Tall Buildings Historic England Advice Note 4 December 2015

Introduction

1. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). In carrying out our role in protecting and managing the historic environment, Historic England gives advice to local planning authorities on certain categories of applications (planning and listed building consent applications), appeals and other matters affecting the historic environment.
2. Historic England is consulted on Local Development Plans under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 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.
3. Historic England's representations in relation to the Pre-submission Plan are made in the context of the requirements of the National Planning Policy Framework (NPPF) in relation to the historic environment as a component of sustainable development and the specific policies relevant to the historic environment.
4. This statement addresses the Inspector's questions with regard to Issue 2 on the local plan Regeneration Strategies. the preparation of a positive strategy for the protection and enhancement of the historic environment. Specifically, it further clarifies Historic England's position with regard to policies for Hammersmith, HRA and HRA2, and for Fulham, FRA and FRA1.

Inspector's Questions – Issue 2:

Issue 2 - Does the Plan contain robust and deliverable regeneration strategies that are consistent with the objectives and policies of the Plan and which are in general conformity with the London Plan?

Q2 Is the heritage approach to all Regeneration Areas consistent with the NPPF?

5. No. The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment (Paras 126 and 157(8)). In Historic England's view such a positive approach should be evident as a clear and consistent thread running through the plan policies from strategic to specific area-based to topic-based policies. Underpinning this should be a proportionate evidence base (NPPF, para 169).
6. It is recognised that suggested minor changes MC28 and MC30 would introduce important references to the historic environment into the Strategic Objectives and Strategic Policy for the regeneration areas. These proposed changes are welcomed

and are consistent with the NPPF in terms of ensuring heritage is considered as a strategic priority (para 156). However, we consider that the individual policies for the regeneration areas should take this forward by recognising the significance of the historic environment within each area, providing for its conservation, and where opportunities arise, enhancement. This can draw on information contained in conservation area appraisals, other characterisation material as well as reference to designated heritage assets. Such material should assist in a plan-led approach to identifying appropriate building heights, taking account of historic character and the settings of heritage assets, as well as highlighting opportunities for re-connecting character areas, analysing urban grain and considering design cues. London Plan policy 7.9 encourages heritage-led regeneration, recognising that by reinforcing the qualities that make heritage assets significant they can help stimulate environmental, economic and community regeneration.

7. With the above issues in mind Historic England considers that Strategic Policy HRA and Strategic Site Policy HRA2 for **Hammersmith Regeneration Area** are deficient in that they fail to take forward a positive strategy for the historic environment for the identified areas. Paragraph 2.53 of the plan provides an overview of the heritage of the main town centres; Historic England would expect this helpful introduction to be further elaborated upon in the context of specific policies for Hammersmith. As part of the plan-making process, and in line with para 169 of the NPPF, we would expect this to be referenced to relevant background information in the explanatory text to support the policies.
8. Historic England has requested that key references to heritage-led regeneration are introduced into HRA and HRA2. The suggested minor changes MC51 and MC52 are welcome but do not, in our view, go far enough. There remains a need to embed consideration of the historic environment within the principles set out in the policy. We also note that opportunities for enhancement from proposals to reconfigure the road network have not been addressed. In view of the severance in the historic townscape resulting from the existing flyover and gyratory, we consider this to be an important moment to assess opportunities for enhancement of local character and heritage.
9. With respect to both **Hammersmith Regeneration Area** and **Fulham Regeneration Area** the background paper relating to Tall Buildings lacks detail as to how the historic environment has been integrated into policies for these areas. This underlines the importance of integrating the historic environment into the policy framework. With regard to Strategic Policy FRA, and explanatory text, there is a lack of clarity as to whether tall buildings are appropriate outside the Opportunity Area. In our view, Fulham town centre with its layout and grain derived from the historic high street, is inappropriate for tall buildings. The prominence of the grade II* listed

town hall (rightly identified in Strategic Policy FRA) is a key civic building in the conservation area whose setting should be respected and the conservation area and surroundings are of modest scale.

Recommendations

10. Historic England considers that the schedule of minor suggested changes does not satisfy our original concerns, and do not deliver a positive strategy for the historic environment as required by the NPPF. We therefore recommend that **Strategic Policy HRA** is amended:
 - in the first set of bullets to make clear that the Council will promote heritage-led regeneration in Hammersmith, and will take opportunities to enhance the significance of heritage assets, including the reinstatement of historic street patterns and townscape
 - in the second set of bullet points relating to implementation, include an additional point reflecting the above; for instance: ‘- be based on a thorough assessment of the heritage significance of the area, including conservation area appraisals and potential 3-D modelling in the case of taller buildings to ensure the conservation of heritage assets and their settings. Opportunities for enhancement of historic character through re-design of the transport network will be pursued’.
 - In the supporting text, para 5.5 (or a new paragraph following 5.48) should identify that the heritage assets of Hammersmith are a key asset to consider in bringing forward development, provide a brief summary of the assets, and refer to their positive potential for place-making, and as well as the need to conserve and enhance such assets through an evidence-based approach. Information from conservation area appraisals could be referred to as well as the potential opportunities for enhancement.
11. In respect of **Strategic Site Policy HRA2**, while we welcome proposed changes MC51 and MC52, as referred to above, we recommend that the opportunity for re-unifying historic townscape and routes, is referenced here.
12. In **Strategic Policy FRA** we recommend that it is clarified that tall buildings outside the Opportunity Area are not proposed