



Historic England

LONDON BOROUGH OF HAMMERSMITH AND FULHAM LOCAL PLAN EXAMINATION

STATEMENT BY HISTORIC ENGLAND

WEEK 2, ISSUE 3: DESIGN, CONSERVATION, ENVIRONMENTAL SUSTAINABILITY

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 3 (week 2) on the local plan policies for Design and Conservation. This relates principally to Historic England's representation relating to policy DC8 Heritage Conservation and to a suggested minor change to policy DC7.

Inspector's Questions – Issue 3:

Issue 3 - Does the Plan take a justified and suitably evidenced based approach towards design, conservation and environmental sustainability? Is the plan consistent with national policy in such regards and will it be effective in implementation?

Q3 Will DC7 (Views and Landmarks) be effective and are they consistent with national policy and aligned with the London Plan?

5. Historic England has not responded to policy DC7 in the pre-submission consultation and we are pleased to note that the supporting text references our Advice Note 4 *Tall Buildings*. However, we note that the Schedule of Suggested Changes, M4, proposes in MC142 a potential weakening of the policy by referring to views into and out of conservation areas not being 'unacceptably harmed'. We are concerned that this potential dilution could be inconsistent with the duty to preserve or enhance conservation areas, as set out in s72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. While we recognise that harm may in some circumstances be justified, we consider the proposed new wording would

provide the wrong starting point by omitting consideration of the justification for harm. In the first instance, this should be avoided, in accordance with the NPPF paras 8 and 152.

Q6 Is the approach in the Plan and wording of Policy DC8 (Heritage Conservation) consistent with national policy and guidance in relation to heritage matters?

6. Historic England supports the suggested changes to policy DC8, MC155, MC156, MC157, MC158, MC159 and MC 160. With respect to MC157, the suggested change may be slightly confusing and so we recommend the following to align with the NPPF: 'Proposals which involve substantial harm or less than substantial harm to the significance of a heritage asset ...'
7. As an additional point, not previously raised, but as a correction to policy DC8, we note that the introductory text does not refer to conservation areas. We trust that this can be treated as a straight forward omission at this stage. To effect the correction we recommend the second sentence reads: 'These assets include: listed buildings, conservation areas, historic parks and gardens, the scheduled monument of Fulham Palace Moated Site, unscheduled archaeological remains and buildings and features of local interest'
8. Historic England further suggests that, in order to provide clarity, it would be appropriate to include reference to the NPPF requirement that proposals should actively avoid harm and promote developments that reconcile heritage significance with economic and social aspirations to achieve sustainable development (NPPF, paras 8 and 152). This could be included in an expanded para 6.222.