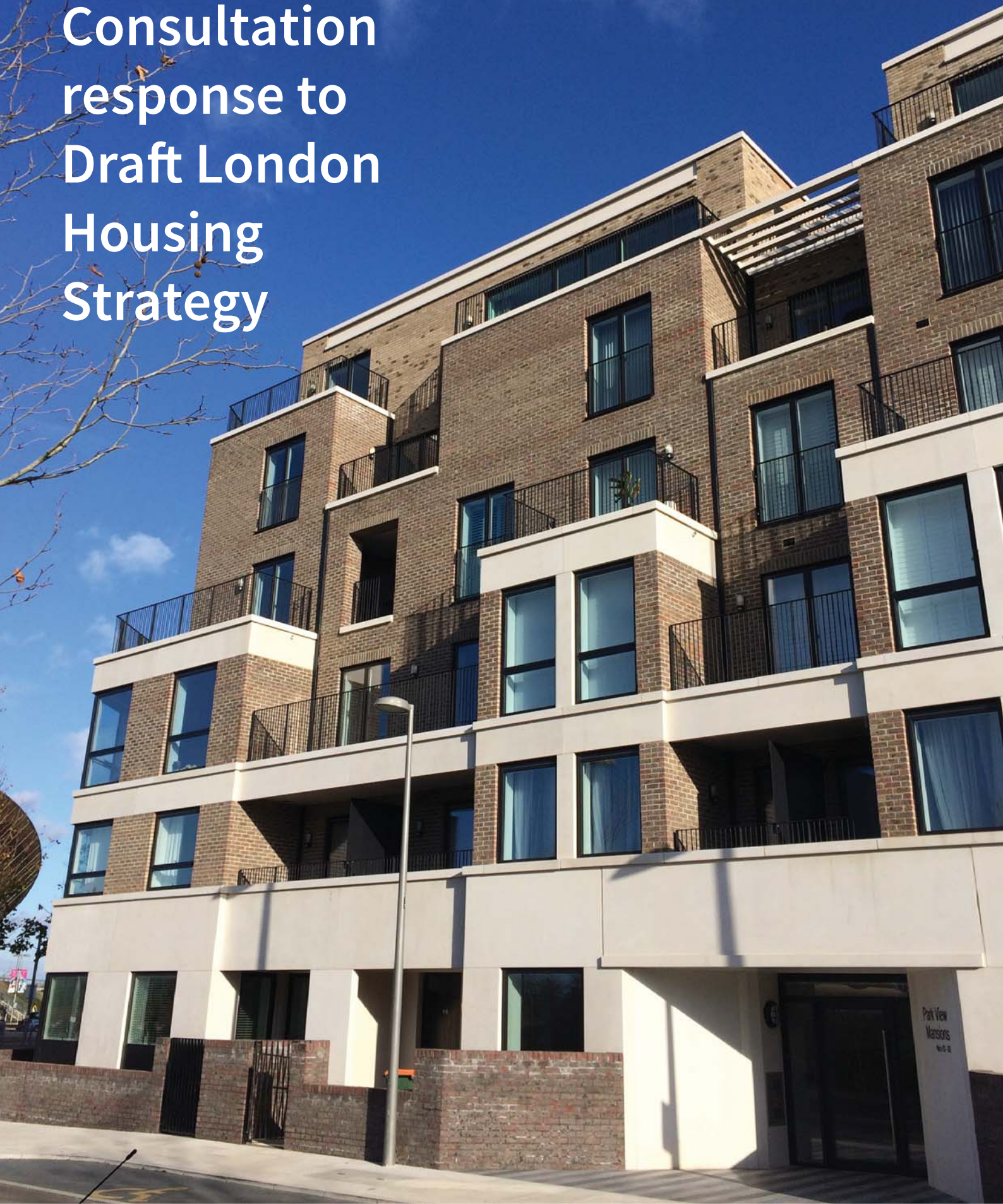




Historic England

Consultation response to Draft London Housing Strategy







Historic England

Our ref: PL00033929

London Housing Strategy
City Hall
The Queen's walk
London
SE1 2AA

By Email: housingstrategy@london.gov.uk

7th December 2017

Dear Sir/Madam,

Consultation on the Draft London Housing Strategy

Thank you for consulting Historic England on the Mayor's draft Housing Strategy for London. As the Government's statutory adviser for the historic environment Historic England is keen to ensure that heritage is fully considered in developing this important strategy. This is especially relevant given the wider planning and environmental responsibilities of the Mayor and the GLA.

The strategy overlaps in a linked way with the Mayor's spatial development strategy in new London Plan and national planning policy for sustainable development. The National Policy Planning Framework (NPPF) identifies the historic environment among the dimensions contributing to sustainable development (para 7) and includes a core planning principle, that planning should '*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*'. These comments are made in the context this overarching policy framework.

The draft strategy sets out to address the challenge of providing the housing the capital needs, and to the standards required. Historic England welcomes the publication of the strategy and the principle that a balanced approach of measures is needed to address this issue. The strategy opens the way to '*think again about where we build new homes, how we build them and who builds them*'. It addresses how to achieve high quality, inclusive development and greater partnership working. We welcome the objectives of the strategy.

There is an opportunity here, in combination with the London Plan, to address the comments of the inspector examining the Further Alterations to the London Plan, by ensuring that densification in London fully takes account of impacts on townscapes, including the historic environment¹, existing communities and social and physical infrastructure.

Our detailed comments on the strategy are attached. We would like to highlight some of the key points:

- We welcome the Mayor's **consideration of scale** within the strategy and the acceptance that tall buildings should have a more limited role in future planning. Historic England has commissioned research into London's character, and different housing typologies. We hope these reports will be useful in taking these ideas forward.
- The Mayor's emphasis on **high quality design** is welcome. Historic England is already engaging with his Public Practice initiative. Together with the appointment of Design champions and increased design review this has the potential to make a real difference in how new development complements and integrates with London's historic character.
- Historic England's report '**Translating Good Growth for the Historic Environment**' 2017 demonstrates best practice examples of excellent design in historic contexts. We recommend that this report is referred to in the Housing Strategy alongside the Mayor's '*Good Growth by Design*' publication as part of the suite of documents on Good Growth.
- London's **town centres** are often historic and distinctive places much valued by local people for the identity and social cohesion they bring. Historic England recommends that this valued character is further brought out in the Housing Strategy to assist the boroughs in bringing forward characterisation of their centres. The strategy could also identify that many town centres have opportunities for repair and use of residential units above shops.
- Housing typologies can be strongly influenced by **standards and targets** in different areas. The Housing Strategy will need be consistent with other strategies, including the Mayor's Environment and Transport Strategies. We also note that many of London's historic streets that remain popular today would not comply with current standards, for instance for daylight and sunlight. In some areas, flexibility should be available to deliver homes that benefit community cohesion and sense of place.
- We note the contribution that **small sites** can make to London's housing supply but have reservations with regard to the presumption contained in the strategy,

¹ Paras 41 and 42 of the FALP Inspector's report (November 2014), and para 54, available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/further-alterations-london>

and the approach in policy H2 of the new draft London Plan. Such sites can provide opportunities for enhancement in historic contexts if subject to normal planning processes. The proposed presumption could, inadvertently, appear to weaken requirements for developments to integrate well with their surroundings, including in conservation areas, and the settings of heritage assets.

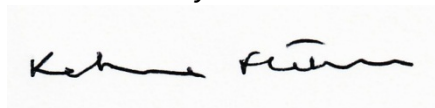
- **Precision engineering** of new housing units offers scope for speeding up delivery. We look forward to learning more about how this method of construction can be adapted to different contexts.
- **Archaeological impact** is often a planning consideration in relation to proposed housing development in London. Only very rarely does it present an in-principle objection but nevertheless archaeology can sometimes add to the cost, complexity and risk of delivery – particularly if it has been left to the last moment to address. In order to support the acceleration and de-risking of decision-making and delivery we suggest several pro-active measures which could be taken to better clarify requirements and focus interventions.

Historic England has recently responded to the Mayor’s draft Transport and Environment strategies, both of which are referenced in the Housing Strategy. We have highlighted some areas in this response where we are seeking better integration of heritage issues in these related strategies.

Please note that we have not yet considered the SHLAA and SHMA reports published by the Mayor on 1st December.

We hope these comments are useful, and that it will be possible to meet with you to discuss some of these points as you refine the strategy in the coming weeks.

Yours faithfully



Katharine Fletcher, MRTPI

Historic Environment Planning Adviser, London

Annex

Historic England's detailed comments on the Mayor's draft Housing Strategy

The following comments address sections 4 and 5 of the draft housing strategy as these sections have particular relevance to London's historic environment, townscape and place-making.

Building homes for Londoners

Densification and typologies

London's historic built environment is, to a large extent, based on walkable neighbourhoods. In this it provides a model for high density housing and sustainable urban living. We note the emphasis in the strategy on increasing density through medium-rise rather than tall buildings (2.27). Development based on streets and a human scale are more likely, in our view, to engender community cohesion, between existing and new residents, and result in successful place-making.

Historic England supports a new approach that places less emphasis on tall buildings due to the often poor relationship of this form in many London contexts. When looking at medium-rise, Edwardian mansion blocks at 4, 5 or 6 storeys are an exemplar that has proved highly popular and adaptable. This tried and tested model has successfully housed families and smaller households for over a century, with examples in many parts of London, from Kensington to Hammersmith, Twickenham to Shoreditch. Mansion blocks have served, and continue to serve, different tenures.

The Peabody estates of Westminster and Islington provide comparable models. The regeneration of the Bourne Estate, Clerkenwell, by Matthew Lloyd architects and Tibbalds to provide additional units is a recent example of the longevity and appeal of this housing typology, and a mixed tenure approach. In the right places, this building type is highly successful.

Historic England commissioned a report '*Local Character and Density*' from Allies and Morrison (August 2016) examining the potential for densification across different character areas in London. This demonstrates that by respecting local character and introducing the most appropriate typologies denser development can contribute to the sensitive evolution of London's places and neighbourhoods.²

Brownfield and town centres

Historic England recognises the difficulty of finding suitable land for housing development in London, and there that much new development relies on identifying suitable brownfield

² '*London's Local Character and Density*' report (Allies and Morrison, Aug 2016) is available on our website at: <https://content.historicengland.org.uk/content/docs/get-involved/allies-morrison-london-local-character-density-final-report.pdf>

sites. The strategy prioritises sites in and around town centres and this needs a very careful approach to ensure London's distinctive heritage is not lost. We are very pleased to see that the new draft London Plan recognises that many town centres contain concentrations of heritage assets (para 2.6.1). Town centres may represent the historic core of an ancient settlement now set within London's urban extent (for instance, Kingston) or they may have more recent heritage values displayed in Victorian and Edwardian shopping parades (for instance, Golders Green). In many town centres distinctive historic buildings provide coherence to the local townscape and the setting for individual architectural highlights. Housing-led regeneration (para 3.19) in and around town centres needs to work in tandem with heritage so that historic character supports vitality and local identity.

The new draft London Plan refers to the need to complement the local character and heritage of town centres in policy SD8. Historic England welcomes this and trusts that celebrating and enhancing London's high streets will be a key area for the delivery of planning policy, both through the London Plan and this strategy.

Town centre regeneration with appropriate conservation can promote vitality and tap the potential for residential units on upper floors. Historic England has, in recent years, grant aided repairs to properties on Tottenham High Road including re-use of upper floors for flats. The renewed emphasis on mixed use in this strategy (para 3.24), and on bringing empty residential units back into use, underlines the need for floors above shops to be a new area of focus.

Small Sites contribution

The strategy promotes the potential of small sites for housing. Historic England agrees with the need to bring forward small sites as a source of housing units and strongly encourages the Mayor to give further consideration to how these can complement existing neighbourhoods. The use of design codes can go some way to provide suitable parameters; however, we do not consider this will be sufficient in areas protected for their special character. Such sites are likely to have individual characteristics that require particular skill to overcome and that require the normal operation of the planning process to resolve. Historic England's report '*Translating Good Growth for the Historic Environment*'³ (July 2017) provides the examples of Thrale Almshouses, Lambeth and St Mary of Eton Church, Hackney, as schemes on small sites where positive and innovative approaches have brought forward new housing.

In view of the, sometimes, awkward nature of small sites, and the need to respect historic contexts, we do not consider that 'a presumption in favour' of their development (policy 3.1 Ai, para 3.21 and policy 3.3 Bi) is helpful. This might be interpreted as outline permission for a number of dwellings before the design has been informed by all necessary considerations, including local context. We also note the legislative requirements to have special regard to the settings of listed buildings, and to consider the

³ '*Translating Good Growth for the Historic Environment*' is available at: <https://historicengland.org.uk/get-involved/protect/keep-it-london/>

desirability of conservation or enhancement in conservation areas. Policy H2 in the new draft London Plan raises this question in particular; we will respond to this in due course.

A further area we would like the strategy to address is how the skills necessary to bringing forward small sites can be harnessed. This might be through the Public Practice initiative, through architectural competition or other means to promote quality and ambition.

The Mayor's proposes a Small Sites, Small Buildings programme in para 3.82 and that the GLA commission a full set of surveys of sites to help reduce risk (Box 3). We would like to know more as to how other information, such as conservation advice, will be provided upfront.

Delivery and Archaeology

Within London Historic England's Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to all but two of the local planning authorities.

Archaeological impact is often a planning consideration in relation to proposed housing development in London, particularly on major development sites. Only very rarely does it present an in-principle objection but nevertheless archaeology can sometimes add to the cost, complexity and risk of delivery – particularly if it has been left to the last moment to address as is sometimes the case. In order to support the acceleration and de-risking of decision-making and delivery we suggest several pro-active measures which could be taken, and referred to in the strategy, to better clarify requirements and focus interventions:

- Provide funding to complete the London Archaeological Priority Area Review Programme (supported in the draft new London Plan 7.1.10) ahead of schedule so that local planning authorities and developers have access to an up to date rapid risk assessment tool.
- Support a strategic review of SHLAA sites and public land being considered for disposal to identify those with significant archaeological risk, and de-risk others. This could be particularly useful in relation to releasing small sites for permission in principle.
- Where significant archaeological risks, and/or opportunities for place-shaping, are identified then prepare project briefs and consider pro-actively undertaking investigations (e.g. for Opportunity Areas or public social housing projects).
- Work with Historic England (GLAAS) to provide training to public sector housing providers.

These ideas draw upon ideas from best practice inside and outside London including on major infrastructure projects where archaeology is generally well integrated with planning, design and delivery. We suggest that such initiatives might be funded as a support package from the Housing Infrastructure Fund.

Improving the skills, capacity and building methods of London's construction industry.

Improving skills is relevant both to the construction of new dwellings and to the retention and repair of existing homes to a good standard.

The proposition that some of London's homes can be precision manufactured, off site, is interesting (policy 3.4C and 3.108 onwards). This is proposed for practical reasons to speed-up delivery. The performance of the buildings in terms of their design, longevity and sustainability will need to be explored as part of the Mayor's drive for good design. The strategy notes that 'the homes we build today need to be fit to last for well over a century' (para 5.2). Historic England will be particularly interested in how this form of construction provides the quality of appearance to promote place-making and neighbourhoods Londoners can be proud of. It is worth noting, in fact, that some historic 'pre-fabricated' buildings are now listed for their heritage interest. Historic England recognises the pressing need to bring forward new homes and supports investigation of the qualities of precision manufactured units.

The strategy notes that most of the homes that London will have in 2050 are already built, and there is a need to improve the existing housing stock. The construction industry must therefore be geared to the repair and adaptation of older properties, including historic buildings. Historic buildings are inherently sustainable; the Victorian terrace, for instance, has proved endlessly adaptable and is capable of sympathetic upgrading for energy efficiency. Historic England's publication, '*Energy Efficiency and Historic Buildings*', provides advice on how energy efficiency measures can be retrofitted in historic buildings.⁴

With respect to increasing capacity in the construction industry (policy 3.4 and para 3.101) Historic England contributes to the Apprenticeship Levy to promote skills appropriate to the repair of older buildings nationally. We are working with the Construction Industry Training Board (CITB) to influence the new construction apprenticeship standards. Historic England's Heritage at Risk grant scheme is also working towards inclusion of more opportunities for skills apprenticeships. We would also remind you that commercial archaeologists are part of the construction industry and that there is an emerging capacity shortage in that sector arising from the demands of major infrastructure projects compounded by Brexit – we urge you to invite the industry's professional body, the Chartered Institute for Archaeologists to contribute to relevant initiatives.

Identifying opportunities for intensification

The preparation of characterisation studies within London is, in our view, a fundamental step in identifying opportunities for development appropriate in local areas. These should support the preparation of Area Action Plans (para 3.26) and development in Opportunity Areas, or smaller sub-areas such as town centres. A recent example is the characterisation of Old Oak and Park Royal Opportunity Area, which is providing an important evidence base for masterplanning and for the emerging Local Plan.

Historic England has commissioned research in this area and the report '*Characterisation of London's Historic Environment*' (Land Use Consultants, August 2016) is available on our

⁴ '*Energy Efficiency and Historic Buildings*' (2011) is available on our website at: <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

website.⁵ The research found that nearly half of London's boroughs had prepared a borough-wide characterisation study, and most outer London boroughs had. We strongly recommend that the Housing Strategy recognises and promotes the use of characterisation information, and the preparation or up-dating of existing studies to assist with bringing forward appropriate housing development. We are currently considering how we can best take forward historic environment characterisation for London as the only part of England not yet covered by our national programme. This will be particularly helpful in terms of de-risking the planning of major growth areas (para 3.53 onwards).

High quality homes and inclusive neighbourhoods

Well designed, good quality homes.

The Mayor's support for excellent design (policy 5.1A) to underpin an expansion of homebuilding is very welcome. His appointment of Design Advocates will help to deliver this. A broad spectrum of experience and skills among the advocates, suited to different contexts, will be needed, including experience of good design in sensitive historic contexts.

Historic England supports, and is a sponsor of, the Mayor's 'Public Practice' social enterprise. The initiative offers great promise in terms of flexible sharing of expertise and best practice within London. We look forward to further engagement as this becomes established.

Environmental quality in London's housing takes many forms and we were disappointed that the Mayor's draft Environment Strategy omitted the issue of quality of place expressed in London's townscapes and landscapes. The capital's built form and high quality historic parks have evolved over centuries with urban grain, plot sizes, and street patterns and spaces often reflecting ancient boundaries, historic uses and influences. These qualities and the architectural richness of the capital's built environment is there for all Londoners to enjoy in their everyday experience of the capital's streets, and is a large part of what makes London distinctive.

We strongly encourage you to recognise the need to address this area and the importance of the two strategies working together to promote a positive relationship between landscape and townscape, their heritage values and the inspiration these can provide for new neighbourhoods and communities. Historic England's commissioned research '*London's Local Character and Density*'⁶ demonstrates the significance of the London's rich urban character and special qualities through analysis of a cross-section of the capital, and sets out possible responses to identified character types.

⁵ '*Characterisation of London's Historic Environment*' (Land Use Consultants, August 2016) is available on our website at: <https://historicengland.org.uk/get-involved/protect/keep-it-london/>

⁶ '*London's Local Character and Density*' report (Allies and Morrison, August 2016) is available on our website at: <https://content.historicengland.org.uk/content/docs/get-involved/allies-morrison-london-local-character-density-final-report.pdf>

The provision of green space within new housing developments will be a key issue. We believe that, with space in such high demand, historic models of shared open space in communal squares and local parks may have increasing relevance. This not only promotes community cohesion but helps integrate historic and modern neighbourhoods through their physical form and legibility.

Housing formats need to be developed so that the potential for conflicts between design parameters and other targets are avoided. With regard to the provision of green space, arguments were advanced in the 1960s that building residential towers allowed increased green space. However, the experience of such space has not always been positive, due to many factors such as poor amenity and a lack of natural surveillance. With this in mind, the increased use of green walls or roofs/roof gardens to contribute to the Mayor's greening target of 50% of London makes sense, and allows for built forms that support human-scale and communities based around streets.

Building Regulations and housing design standards

The historic terraces of London were built to comply with the London Building Acts at the time, which influenced their design and form.⁷ Fire safety regulations are currently under scrutiny and regulations such as these will be prescribed, mandatory standards. Other regulations will be applied to new developments as appropriate, such as for daylight and sunlight, and access arrangements.

Historic England welcomes the approach in para 5.13 that the Mayor's housing design standards will include examples of the kind of development that should be supported. High quality design solutions can provide for the needs of all Londoners, by meeting needs differentially across developments. By providing examples of good practice the best results can be achieved.

Accessible housing

Historic England is keen to ensure that London's heritage is made as accessible as possible for all Londoners. We would welcome a reference being included in the Housing Strategy to our publication '*Easy Access to Historic Buildings*' June 2015, which provides advice on adaptation of historic buildings to promote inclusive access arrangements.⁸ This could be included to support policy 5.2 addressing meeting London's diverse housing needs.

Environmentally sustainable homes

Historic England supports the Mayor's emphasis on improving energy efficiency in existing homes (policy 5.1 Bii and para 5.24). As referred to above, our publication '*Energy Efficiency and Historic Buildings*' provides advice on how energy efficiency measures can be retrofitted in historic buildings.⁹ A case study '*Improving Soho's Environmental*

⁷ Ibid, p7

⁸ '*Easy Access to Historic Buildings*' is available on our website at:

<https://historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/>

⁹ '*Energy Efficiency and Historic Buildings*' (2011) is available on our website at:

<https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

*Performance*¹⁰ conducted by Historic England with Westminster City Council in 2013 provides practical guidance on implementation. We have requested that reference to the sensitive adaptation of historic buildings and this specific advice is included in the Mayor's Environment Strategy and this is equally relevant to this strategy.

Social infrastructure and housing

The Mayor's Healthy Streets Approach recognises the contribution of London's historic environment to Londoner's enjoyment and everyday lives, and to well-being. Well-designed new housing can continue this variety and delight in London's streets and places. Historic England's revised advice '*Streets for All*'¹¹ on the public realm is out to consultation and seeks to address how the London's streets can provide a positive experience in conjunction with quality in built and historic environment.

New social infrastructure will be needed to serve the increase in London's population. The strategy could include reference to the potential of some of London's under-used community assets such as historic pubs, churches, theatres and cinemas and the benefits of bringing these valued assets back into use. Historic England's Heritage at Risk Register 2017¹² identifies some of these community assets. We would be pleased to discuss any of these assets with owners and other interested parties.

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Inside cover. Park Village East ©Historic England.

¹⁰ '*Improving Soho's Environmental Performance*' 2013, is available on our website at: <https://historicengland.org.uk/images-books/publications/improving-historic-sohos-environmental-performance/>

¹¹ '*Streets for All*' draft advice for London is available at: <https://historicengland.org.uk/images-books/publications/streets-for-all/>

¹² London's Heritage at Risk Register 2017 is available on our website at: <https://historicengland.org.uk/images-books/publications/har-2017-registers/>