



# Consultation Response Towards a new London Plan June 2025



Our ref: PL00796938

20 June 2025

The Mayor of London  
c/o Ms Lisa Fairmaner  
Head of London Plan and Strategic Planning Team  
Greater London Authority

By email: [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)

Dear Mayor of London

### **Towards a new London Plan: Consultation on the next London Plan, and Call for Information**

Thank you for consulting Historic England on *Towards a new London Plan* and an associated Call for Information. As the Government's adviser on the historic environment, we are keen to ensure that the conservation and enhancement of London's diverse and abundant heritage is fully considered in the preparation of this important plan. We have a wide range of research, advice and guidance that we believe will assist you with this process, and we want to support the GLA through active and ongoing collaboration.

We are a statutory consultee on both the spatial development strategy for Greater London and its accompanying sustainability appraisal. Our comments are made in the context of the Government's National Planning Policy Framework.

### **Introduction**

The scale of housing growth envisaged for London during the next plan period presents an unprecedented challenge. Bold and creative approaches to planning will be needed to achieve this in a way that retains the best of London, respects the character and identity of its neighbourhoods, and responds to the twin challenges of climate change and nature recovery. We recognise the importance of getting this right for Londoners.

Historic England considers the London Plan 2021 to be a strong foundation on which to build the next plan: pursuing Good Growth through a contextual approach to development. There have been times in recent years when development proposals have failed to respond appropriately to heritage, resulting in delays and frustrations for both developers and communities. The GLA is well

placed to tackle some of these challenges, such as the implementation of Opportunity Areas and management of tall building clusters on borough boundaries, or near to sensitive locations such as London's four World Heritage Sites. We therefore welcome many of the aspirations and propositions contained in this consultation document. For many of the themes discussed, we believe heritage can form part of the solution. We particularly wish to highlight the following:

- The consultation document recognises London's world-renowned heritage and built environment, rightly describing these as emblematic of the city and a source of civic pride. These buildings and places make a huge contribution to the appeal of London to residents, visitors, and also businesses. A robust decision-making framework for heritage will therefore continue to be essential, through a combination of national, strategic and local planning policies.
- Incorporating consideration of heritage into the plan making process from an early stage will help to ensure that the plan's bold proposals for growth and change are achievable and do not encounter unexpected issues at planning application stage.
- Heritage is an economic catalyst in the development of places, giving a competitive advantage to many of London's business areas, creative clusters, town centres and high streets. Heritage-led regeneration can help to unlock the potential of those that have been left behind, promoting equity and reinforcing people's sense of place.
- Climate change is one of the greatest challenges of our time. We welcome the promotion of energy efficiency measures, heat networks, flood risk management and urban greening. We believe that through good planning these can be achieved in ways that respond positively to the historic environment. The reuse and sensitive adaptation of historic buildings offers multiple benefits, protecting our heritage by keeping it in use while providing space for new homes with low embodied carbon outcomes.
- We welcome the fact that open spaces, nature recovery and London's waterways are all strong themes within the consultation. Natural and historic environments are inseparable and managing them together will result in more effective responses to climate change, while also harnessing their benefits for people's wellbeing. We particularly support the idea of a renewed focus on the River Thames as a defining component of the character and identity of the city.
- Finally, we continue to strongly support the London Plan's design-led approach to optimising site capacity for housing and other uses. We recognise that there are opportunities to build on the current approach to provide greater certainty and consistency in decision making. A small-sites design code could help deliver gentle density, intensifying residential areas in a way that is responsive to local context and character. Developing new homes from vacant historic buildings can also make a contribution to future supply.

In conclusion, as you progress work on the new London Plan we would welcome the opportunity to work closely with you and your team to ensure that heritage is at the heart of London's future and continues to enrich the lives of people who live in, work in and visit London. If you have any queries or seek further advice or support from Historic England, please do not hesitate to contact me.

Yours sincerely,

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## Image credits

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Heritage At Risk 2024. Historic England Archive DP528038

Back cover image: St Paul's Cathedral and West Towers at sunset.  
St Paul's Setting Study. Historic England Archive DP528866

## Historic England comments on Towards a new London Plan

Below we have provided our comments on *Towards a new London Plan*, progressing through the document section by section. Where we are responding to specific matters raised in the consultation document, we have used sub-headings in the right-hand column for clarity.

Where we are submitting supporting information, this is generally provided as a hyperlink with access to our online advice and research. In cases where this has not been possible, either because documents are not available online or have not yet been finalised, we have provided the title of the project. Where we can assist further, we would be pleased to do so.

Page	Section	Historic England response
<b>1. Introduction</b>		
10-11	1.7 Integrated Impact Assessment (IIA)	<p>Incorporating robust consideration of heritage into the plan making process from an early stage will help to ensure that the plan's bold proposals for growth and change are achievable and do not encounter unexpected issues at planning application stage.</p> <p>Historic England welcomes confirmation that the plan will be supported by an Integrated Impact Assessment in line with the requirement to prepare a Sustainability Appraisal/Strategic Environmental Assessment. We would be pleased to assist you with your methodology for assessing heritage impacts. We also have several guidance documents that will help you with this:</p> <ul style="list-style-type: none"> <li>- <a href="#">The Historic Environment in Local Plans</a> (Good Practice Advice in Planning 1)</li> <li>- <a href="#">The Historic Environment and Site Allocations in Local Plans</a> (Historic England Advice Note 3)</li> <li>- <a href="#">Sustainability Appraisal and Strategic Environmental Assessment</a> (Historic England Advice Note 8)</li> </ul>
13	1.10 Good Growth objectives	<p>Historic England broadly supports the retention of the London Plan's Good Growth objectives as an expression of 'sustainable development' in the London context. The National Planning Policy Framework (NPPF) is clear that sustainable development is the purpose of the planning system.</p> <p>Our heritage provides cross-cutting benefits that contribute to social, economic <i>and</i> environmental aims. Heritage improves Londoners' lives, supports economic growth and, when managed well, greatly improves the character and identity of places.</p>

		<p>Increasingly, when managing the historic environment, we need to consider the implications of, and for, climate change and nature recovery. Further integration of all environmental considerations – including the character and history of London’s varied places – into our thinking at an early stage of planning will ensure that these best support, rather than constrain, Good Growth.</p> <p>The London Plan 2021 expresses the Good Growth objectives more fully through Policies GG1 – GG6. We particularly support the references to town centres, culture and identity (GG1), strengthening London’s distinct and varied character (GG2), and promotion of London’s rich heritage and cultural assets (GG5).</p> <p>We would welcome further discussions with you about any potential adjustments to the Good Growth objectives or associated policies.</p>
<b>2. Increasing London’s housing supply</b>		
20-23	2.3 Opportunity Areas	<p><b>Implementation of Opportunity Areas (OAs)</b></p> <p>Historic England recognises that OAs are often complex brownfield sites that are difficult to develop. Nevertheless, the capacity for growth in these areas ought to be based on a robust understanding of the site’s context, character, opportunities and constraints, to inform capacity assumptions at plan-making stage.</p> <p>Unfortunately, OAs have sometimes been the source of conflicts between proposed levels of growth and conservation of some of the nation’s most significant heritage assets. These often-avoidable conflicts have been difficult to resolve, slowed delivery and in some circumstances have caused tensions with the imperative that the UK Government meet its international obligations under the World Heritage Convention. Important examples include the impact of development at Vauxhall Nine Elms Battersea OA on the Palace of Westminster and Westminster Abbey World Heritage Site, and the impact of development in the Great West Corridor OA in Hounslow on the Royal Botanic Gardens at Kew World Heritage Site.</p> <p>Robust stakeholder engagement and planning frameworks that respond to the local context are needed, with adherence to these in subsequent design and decision making.</p>
23-24	2.4 Central Activities Zone	<p>The consultation identifies the Central Activities Zone (CAZ) as the UK’s economic powerhouse, at the forefront of London’s global</p>

	<p>city offer. We would add that it is a cultural powerhouse, home to many theatres, music venues, shopping and eating destinations, religious and cultural institutions that draw people in from across our country and, indeed, from across the world. These include some of the nation's finest heritage assets. Buildings and places such as St Paul's Cathedral, the Tower of London, Soho, Bloomsbury and the South Bank, form part of our national identity and are globally recognisable. The archaeology of London has itself formed the basis of new visitor attractions, such as the Roman Mithraeum and Elizabethan playhouses.</p> <p>Thus, both the CAZ and the places and heritage assets it contains make a huge contribution to the appeal of London to residents and visitors alike. We particularly support parts C and E of adopted London Plan Policy SD4, along with paragraphs 2.4.9 and 2.4.11 of the supporting text, which recognise the importance of culture and heritage to the CAZ. Please also see our response to section 3.1 of this consultation, which further considers the role of the CAZ.</p> <p><b>Strategic views and the London View Management Framework (LVMF)</b></p> <p>We note the comment that some stakeholders have raised concerns about the constraints posed by protected views and viewing corridors, and we very much welcome the Mayor's commitment to ongoing protection of London's strategic views.</p> <p>We would be concerned by any weakening of the LVMF in terms of the protection it provides to key heritage assets. We will continue to support the GLA with its ongoing and timely review. We would also be pleased to assist you with any associated update of Policies HC3 <i>Strategic and Local Views</i> and HC4 <i>London View Management Framework</i>. We are mindful that there are other views that are significant to the image of Greater London, such as the Richmond Hill view looking west, and designed views from the cemeteries at Highgate and Nunhead that meet at St Paul's. We would be pleased to provide a copy of the new St Paul's Setting Study to inform your work.</p> <p><b>Repurposing lower grade office stock for housing</b></p> <p>Historic England promotes the reuse of historic buildings as something which provides multiple benefits: protecting heritage by</p>
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		<p>keeping it in use, and providing floorspace for new housing or other uses while delivering low embodied carbon outcomes.</p> <p>Section 2.4 of the consultation document concludes by briefly noting that there may be opportunities for repurposing lower grade office stock for housing and other uses. Our advice and research demonstrates how historic buildings can make an important contribution to this, while delivering schemes that are both sensitive to heritage and create good quality places for people:</p> <ul style="list-style-type: none"> <li>- <a href="#">Heritage Works for Housing</a> provides a process and case studies for the successful reuse of historic buildings as homes.</li> <li>- <a href="#">New homes from vacant historic buildings</a> suggests that nationwide there is an opportunity to provide around 600,000 new homes by repurposing existing historic buildings.</li> </ul>
24	2.5 Town centres and high streets	<p><b>Contribution of town centres to housing supply</b></p> <p>The consultation document considers the potential of our town centres and high streets to increase their contribution to housing. Adopted London Plan Policies SD6-SD9 recognise the role of town centres as a focus for Londoners' sense of place, while promoting housing-led intensification in a way that complements local character and heritage assets. We support this approach and consider that the references to heritage, character and the vibrancy of town centres are essential.</p> <p>Our <a href="#">High Streets Heritage Action Zone</a> programme has demonstrated through a diverse range of projects how heritage-led regeneration can unlock the potential of our town centres.</p> <p>The consultation document contains specific propositions for town centres in section 3.3, which we address later in this response insofar as they may interact with heritage considerations. In our response to section 2.4 we discussed the potential for reuse of historic buildings as housing, which includes the vacant space above shops in town centres. Our related comments on high density development in association with transport connectivity can be found in response to section 4.3.</p>
25	2.7 Wider urban and suburban London	<p><b>Approaches to intensifying existing urban neighbourhoods</b></p> <p>The consultation document discusses a range of approaches to intensifying existing areas, promoted by the boroughs at present.</p>

		<p>In our response to section 4.1 <i>building height and scale</i>, we highlight the opportunity to use historic characterisation of distinct areas of London to support a small-sites design code.</p> <p>Given the consistency of certain building character types in London, for example the typical housebuilder typologies of the 1930s or 1950s, we consider there is good potential for the GLA to lead this work, underpinned by evidence that Historic England considers will help support good design and characterful place-making.</p>
25-26	<p>2.8 Other sources of housing supply</p> <p>2.9 Beyond London's existing urban area</p>	<p><b>London-wide Green Belt review and identification of 'grey belt'</b></p> <p>Historic England recognises the importance of the London-wide Green Belt review as part of the evidence base for the London Plan, associated borough plans and potentially site-specific development proposals. We will engage with the review insofar as it has implications for the setting and special character of historic towns, and the conservation of heritage assets including archaeology.</p> <p>Information sources that should be referred to in conducting this assessment include the <a href="#">National Heritage List</a>, the <a href="#">Greater London Historic Environment Record</a>, London's <a href="#">Archaeological Priority Areas</a>, Conservation Area Character Appraisals and the London Historic Characterisation project.</p> <p>The definition of 'grey belt' is important in heritage terms. According to the NPPF, not only does this involve assessing Green Belt land against the three purposes referred to in the consultation document, but it also excludes land where application of the policies relating to areas and assets in NPPF footnote 7 would provide a strong reason for refusing or restricting development. Footnote 7 includes designated heritage assets and other assets of archaeological interest equivalent to scheduled monuments.</p> <p>We therefore consider that Green Belt reviews should be carried out with input from heritage professionals, to ensure that heritage assets and their settings are properly considered. Otherwise, any reports and policies linked with these reviews should be clear that the outcomes are to be understood as strategic evidence base only. Definitions of grey belt where heritage assets may be affected would not be definitive and should not prejudice proper</p>

		assessment of heritage impacts when <a href="#">identifying site allocations in local plans</a> , or when <a href="#">determining planning applications</a> .
26-27	2.10 Large-scale urban extensions in the green belt	<p><b>Integration of Green Belt development with Local Nature Recovery Strategies</b></p> <p>We support the idea of a joined up strategic approach to considering any major new development in the Green Belt, including any future New Towns, with Local Nature Recovery Strategies (LNRS). Such an approach would help to optimise the multiple benefits of green space for Londoners and for nature. The latter could also help to identify opportunities for new or improved/expanded parks, such as Metropolitan Open Land.</p> <p>Historic places may also have a part to play in this, for example where there are opportunities to restore relict parkland, or to revitalise historic buildings as the centrepiece of a public park. However, as set out in our response to sections 2.8 and 2.9 it will also be critical that the location and design of any new development in the Green Belt has due regard to the historic environment, in line with statutory duties and national and local planning policies.</p> <p>We discuss the role of heritage in LNRS in greater detail in our response to section 5.5 <i>Green and open spaces</i>.</p>
29	2.11 Metropolitan Open Land	<p><b>Protection and potential release of Metropolitan Open Land</b></p> <p>Historic England welcomes the continued protection of Metropolitan Open Land (MOL) given its multi-functional benefits and importance to London's communities. Much of this land is of historic interest in its own right, or forms part of the settings of heritage assets.</p> <p>MOL includes many registered parks and gardens, such as Hyde Park (grade I), Osterley Park (grade II*), Highgate Cemetery (grade I) and Syon (grade I), to name but a few. There will also be non-designated heritage assets on London's Parks and Gardens Inventory and on the Greater London Historic Environment Record. More generally, large areas of MOL possess historic landscape value and well-preserved archaeology, by merit of having largely avoided modern development.</p> <p>Historic landscapes that form part of the MOL may be wholly or partly publicly accessible, accessible on a paying basis, accessible to residents or potentially not accessible at all.</p>

		<p>Consequently, it will be important that any review of potential areas of MOL for release as housing or accessible open space provision is not based solely on an assessment of public access and biodiversity value. There should also be a robust assessment of the significance of the area, potential impacts, and opportunities for access and enhancement associated with its release.</p> <p>Please also see our response to section 5.6 which discusses MOL as an aspect of London's open spaces.</p>
<b>3. Growing London's economy</b>		
39-40		<p>London's rich and unique heritage is a major part of its appeal as a location for business and investment. This is perhaps nowhere better illustrated than the Square Mile, where global business has co-located with the tangible evidence of London's Roman origins, a unique collection of religious buildings including Wren's City churches and St Paul's Cathedral as well as Bevis Marks Synagogue, and the infrastructure of key professions such as banking and the law. It is therefore essential that economic growth is realised in a way that conserves and celebrates the very things that make London so attractive.</p> <p>We discuss the competitive advantage offered by heritage to business locations, and the role of heritage in regeneration, as part of our <a href="#">Heritage Counts series online</a>. Remarkably this notes that up to 48% of the national retail stock and 33% of all our offices are over a century old and still in productive use.</p>
40-41	3.1 The Central Activities Zone	<p>Historic England recognises the role and function of the CAZ as an economic and cultural powerhouse and we have discussed this in our response to section 2.4. We consider it essential that the London Plan continues to emphasise the importance of heritage to the CAZ, as a key factor in its global appeal as well as a driver of local regeneration. To illustrate the huge draw of our heritage, according to Visit Britain the Tower of London was the most visited paid-for attraction in England in 2024, with cultural attractions in historic places in London also forming most of the top 10 free sites.</p> <p>We consider there is potential for economic growth across the CAZ, helping to ensure that any associated impacts are not so focused on a particular area that they cannot be effectively managed.</p>

		<p><b>Mayoral Development Corporation for Oxford Street</b></p> <p>The consultation document briefly touches on the identification of key areas, such as Oxford Street, as priorities for commercial development. In our recent response to the Mayor’s proposed Oxford Street transformation, we highlighted the role of heritage as a key feature underpinning Oxford Street’s experiential offer, setting it apart from both digital retail offers and modern shopping malls.</p> <p>We will continue to offer advice and support to the GLA on how to sustain the significance and special character of historic places as part of major regeneration initiatives.</p>
41-42	3.2 Specialist clusters of economic activity	<p><b>Identification of clusters of specialist activity beyond the CAZ</b></p> <p>Specialist clusters of economic activity sometimes reflect historic trades or traditions and often coincide with designated conservation areas. We would therefore support the identification of specialist clusters beyond the CAZ insofar as this could help to sustain their historic interest, special character and economic viability. We would be interested to explore with you whether there is an opportunity to more explicitly include traditional industries within this category - please also see our response to section 3.4.</p>
42-44	3.3 Town centres and high streets	<p>The character and history of London’s town centres and high streets are important to their identity, valued by local people, and set them apart from both digital retail offers and modern shopping malls. Many of them are also conservation areas and we hold further information on the heritage value of London’s town centres. We therefore support the references to character and heritage within adopted London Plan policies for town centres and high streets (please also see our response to section 2.5).</p> <p>Evidence on the role of heritage as an economic catalyst in the development of places including high streets can be found in our <a href="#">Heritage Counts series online</a>. Our <a href="#">High Streets Heritage Action Zone</a> programme has further demonstrated, through a diverse range of projects, how heritage-led regeneration can unlock the potential of our town centres and improve people’s lives. This includes examples of under-used or ‘at risk’ heritage assets coming into use as local cultural institutions and thus playing a central role in regeneration of the wider area. For example, Stanley Halls in Croydon or the Old Town Hall in Woolwich.</p>

		<p>The new London Plan can help to ensure that new growth in town centres harnesses this competitive advantage and regeneration potential by ensuring that development continues to protect and promote their valued character and heritage.</p> <p><b>Adaptation of town centres to support a wider range of uses</b> We broadly support the diversification of uses in town centres to sustain their economic viability. In section 2.4 of this response, we discussed the potential of historic buildings to deliver new housing. This includes conversion of the space above shops, which we believe in most cases should be achievable in ways that respect the significance of the building.</p> <p>Retaining active ground floor uses and historic shopfronts wherever possible (insofar as this is subject to planning control) will be an important consideration in historic town centres and high streets. It would be helpful if the new London Plan policy promoted this, potentially as part of a revised Policy SD7 6(c).</p>
44-45	3.4 Industrial land	<p>The consultation document notes that the character of industrial areas varies across London. It also notes the potential for loss of light industrial space due to revisions to the national Use Classes Order.</p> <p>We would be interested to explore with the GLA whether there is a role for the London Plan in recognising and protecting these areas and uses where they contribute to the historic character and vitality of an area. For example, the remaining evocative Thameside industrial areas of east London with their associated wharfs, or areas on the City fringe such as Hatton Garden and Shoreditch. This could potentially be in association with specialist clusters of economic activity, which sometimes reflect historic trades or traditions (see our response to section 3.2). For example, Policy SD4 G could identify traditional industries alongside those uses currently mentioned.</p>
45	3.5 London's night-time economy	<p>Please see our response to sections 3.1 <i>Central Activities Zone</i>, 3.2 <i>Specialist clusters of economic activity</i>, and 3.6 <i>Culture and creative industries</i>.</p>
45-46	3.6 Culture and creative industries	<p>Many cultural venues occupy historic buildings, including those associated with music and performance, visual arts, cinemas and museums. Historic England is therefore broadly supportive of the idea of a reinforced policy framework to conserve and sustain these places.</p>

		<p>Adopted Policy HC5 A(1) encourages boroughs to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces.</p> <p>Historic England has been working with the GLA and other partners to develop an approach to engaging communities to understand what they value about the heritage of their area. This relates to both ‘tangible’ physical places and ‘intangible’ cultural practices, and may go beyond the types of places that would usually be included on a <a href="#">local list</a>. We believe that this work, currently referred to as the London Heritage Engagement Strategy, could have a role to play in the implementation of Policy HC5. We would be pleased to work with you to explore how this might be further developed as a toolkit for boroughs.</p> <p>Finally in relation to Policy HC5, we wish to highlight that existing historic or cultural assets, such as churches or cinemas, will often provide strong candidates for reuse as cultural venues. The promotion of such opportunities would be particularly important in situations where cultural venues have fallen out of use and into disrepair. It would therefore be helpful if Policy HC5 were adjusted to encourage reuse of vacant or underused cultural venues for similar activities, particularly where they hold tangible and intangible cultural heritage value. This is not just for temporary or meanwhile uses, but also in situations where a new permanent use is needed.</p>
<b>4. London’s capacity for growth and design quality</b>		
50	4.1 Building height and scale	<p><b>Scale and density of development in London</b></p> <p>Historic England recognises the great challenge faced by London of meeting current and future needs for housing and other forms of development. Creative and thoughtful approaches to planning and design will be important to meet these needs in ways that respect the characteristics that make London special. Our own research into <a href="#">Increasing Residential Density in Historic Environments</a> provides evidence and case studies of how historic places make an important contribution to sustainable growth.</p> <p>We support the idea of increasing the overall density of development in London, and note that London’s most historic areas, illustrated by a concentration of designated heritage assets,</p>

	<p>are often the most densely developed. Our work with Allies and Morrison in 2016 offers a detailed exploration of <a href="#">London's Local Character and Density</a>. On this basis we believe that increasing density should be done, and can be done, in a way that responds to local character and context.</p> <p>Increasing densities in this way is consistent with policies in Chapter 11 of the NPPF <i>Making effective use of land</i>, in which paragraph 129(d) states that planning policies and decisions should take account of the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change. Paragraph 130 goes on to promote the use of area-based character assessments, design guides and codes and masterplans, to help ensure that land is used efficiently while also creating beautiful and sustainable places.</p> <p><b>Setting acceptable building heights across London</b></p> <p>Historic England continues to strongly support the London Plan's established 'design-led approach' to optimising site capacity, which seeks to achieve growth in a way that responds to the character and context of individual sites and broader areas. This approach is primarily contained in Policy D1 <i>London's form, character and capacity for growth</i>, and Policy D3 <i>Optimising site capacity through the design-led approach</i>.</p> <p>The consultation document considers setting appropriate building heights across London in locations that share certain characteristics. If this approach is pursued then appropriate building heights would need to be informed by robust upfront evidence about local character, context and prevailing building heights.</p> <p>We consider that such an approach is likely to be more effective in areas that already have a relatively uniform height and character. It may also be more readily applied to large sites or regeneration areas. By contrast, it is unclear how this approach would apply in areas of more varied height and character, or to smaller site allocations which may offer an opportunity to boost density while responding sensitively to character and context. Care would need to be taken to avoid unintended consequences for the design of buildings and the roofscape.</p>
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	<p>A more nuanced approach could involve setting numbers of storeys, rather than heights, in relation to the prevailing context. For example, ‘one to two storeys’ above the prevailing context.</p> <p>Where there are heritage assets present, such as listed buildings and conservation areas, proposed building heights would need to take account of the significance of these assets and potential impacts upon it. Alternatively, the policy could be clear that proposed heights are indicative and would be subject to further detailed assessments at planning application stage, including Heritage Impact Assessment.</p> <p><b>London-wide small sites design code</b></p> <p>Historic England broadly supports the idea of a small sites design code as a means of achieving ‘gentle densification’ across London. We consider it of utmost importance that this is informed by robust analysis of the urban fabric and local character. We would be pleased to work with you on how design coding could be informed by historic characterisation and other historic environment datasets such as the <a href="#">Greater London Historic Environment Record</a>.</p> <p>With your support, we have developed the <a href="#">London Historic Character Thesaurus</a> as a means of mapping and analysing historic character at a range of scales. This has informed the Greater London Historic Characterisation Map which, for the first time, applies a consistent approach to characterisation on a citywide basis. Drawing on initial feedback, we hope to refine this dataset in 2025 and make it widely available to local authorities and the public to support effective planning, both locally and London-wide.</p> <p>According to the National Model Design Code, coding should also be informed by an understanding of an area’s heritage. It may not therefore be appropriate to apply the same approach to areas that are formally designated. We would like to explore with you how the London Plan small sites policy, and any associated design code, could incorporate an appropriate response to designated and non-designated heritage assets.</p> <p>We strongly encourage an approach that prioritises the reuse of existing buildings, especially those of historic character. This not</p>
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		<p>only leads to more interesting and locally distinctive places but has the further important benefit of reducing carbon emissions.</p> <p>Conversely, we would encourage an approach that identifies opportunities for enhancement where existing sites/buildings currently detract from the area, such as vacant garage blocks or low-density retail parks.</p>
51	4.2 Tall Buildings	<p><b>Current London Plan approach to tall buildings</b></p> <p>In line with our <a href="#">guidance on Tall Buildings</a>, Historic England continues to advocate for a plan-led approach to tall buildings in London. This should be informed by robust evidence at plan making stage. We appreciate that there have been some issues with the implementation of Policy D9 <i>Tall buildings</i>, yet the approach that it promotes is increasingly reflected in borough plans through the identification of tall building locations and heights.</p> <p>We continue to support the idea that tall buildings should be resisted where they have not been identified through a strategic planning process (including a strategic assessment of heritage impacts), although we recognise that there may be exceptions.</p> <p>We note that there is some confusion at present, based on the policy, supporting text and associated guidance, around whether borough plans should identify ‘appropriate’ or ‘maximum’ building heights. As borough plans will only be supported by a strategic evidence base that does not assess all impacts, we believe that it is preferable that plans identify maximum permissible building heights. If necessary, these can be presented as an indicative maximum.</p> <p>It is also important to recognise that while high density development will often be desirable, tall buildings will only be appropriate in some contexts. The supporting text to Policy D9 advocates that boroughs carry out a sieving exercise to identify suitable locations. Some sites may be inherently unsuitable for tall buildings due to the harm they would cause to the significance of heritage assets. In addition to this, it is often harder to deliver good places that work for local communities using tall buildings. We consider there is an opportunity to rebalance the plan to promote other means of optimising density. This could include adjusting</p>

	<p>Policy D3 and/or D9 to promote and provide a framework not just for tall buildings, but also for mid-rise typologies.</p> <p>More generally the relationship between Policies D3 and D9 may benefit from clarification. At present, Policy D9 does little to promote design quality or master planning, instead focusing on impacts. While some additional guidance is provided in the supporting text, we believe that there is an opportunity to promote a positive relationship between buildings and their surroundings, and to identify considerations for determining the appropriate form of tall building clusters, and variations in building heights.</p> <p>We would be pleased to assist you with any further refinements to Policy D9, including how it deals with the historic environment. For example, as the significance and settings of heritage assets are not only affected by ‘visual’ considerations, policy criteria that relate to heritage could potentially be moved to section (3) <i>environmental impact</i>. In relation to section (4) <i>cumulative impacts</i>, we are keen to ensure that the policy wording does not preclude consideration of cumulative harm that has occurred as a result of past development. For example, in relation to the Tower of London and Palace of Westminster World Heritage Sites, past tall building development has resulted in harm to their Outstanding Universal Value that could be further exacerbated by future tall building proposals unless carefully located and designed.</p> <p><b>A more active role for the London Plan in identifying and defining tall building clusters</b></p> <p>We consider there may be merit in the London Plan taking a more active role in the definition of tall building clusters (location and form) in areas of strategic importance or where there are cross-boundary issues and impacts. In other circumstances, we consider it preferable that the boroughs continue to lead this work. Any tall building locations identified by the London Plan should be informed by robust evidence, including an understanding of character, views and heritage assets that could be affected.</p> <p>We also consider it preferable that in most circumstances borough plans continue to identify the thresholds for tall buildings in their areas, in a way that responds to the local context. This recognises that while a seven-storey building in some locations may have a</p>
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		<p>major impact on the townscape, heritage and visual amenity, in other areas it could blend seamlessly or result in minimal impacts.</p> <p><b>How planning applications for tall buildings should be assessed outside of tall building locations</b></p> <p>Historic England considers that tall buildings in any location should be subject to a robust assessment at planning application stage. However, to ensure that the role and impacts of tall buildings can be managed strategically, we believe that tall building development outside of locations identified in plans should remain exceptional.</p> <p>For further guidance on tall buildings in relation to the historic environment, please refer to our general advice on <a href="#">Tall Buildings</a> (Historic England Advice Note 4)</p>
51-52	4.3 Supporting a denser London linked to transport connectivity	<p>Historic England supports the general principle of higher density development in sustainable, accessible locations. This is consistent with both the NPPF and current London Plan Policy D2. When considering approaches to high density at town centres and public transport interchanges, including the appropriate height and scale of development, it will be important that consideration continues to be given to the context and character of the area, potential impacts on heritage assets, and opportunities for regeneration and change. This is consistent with NPPF Chapter 11 and the London Plan design-led approach. The character of an area relates not just to how it looks, but also to how it functions.</p>
52	4.4 London's heritage	<p>The consultation document recognises London's world-renowned heritage and built environment, describing these as emblematic of the city and a source of civic pride. Historic England agrees.</p> <p>A robust decision-making framework for heritage will therefore continue to be essential, through a combination of national, strategic and local planning policies. Our comments below relate to the specific propositions in the consultation document for changes to London Plan heritage policies.</p> <p><b>Adaptation and retrofit of historic buildings</b></p> <p>We welcome the GLA's recognition of the role played by historic buildings in meeting net zero. Historic England supports the idea of a new policy on the sensitive adaptation and retrofit of historic buildings. Some of the considerations that this policy could</p>

		<p>address are also relevant to buildings of ‘traditional’ construction more generally.</p> <p>We would be pleased to assist you in developing a policy that promotes best practice in this area. Careful consideration should be given to:</p> <ul style="list-style-type: none"> <li>- The scale of the challenge in London, particularly in those borough’s where much of the building stock comprises of historic buildings.</li> <li>- The importance of understanding ‘significance’ when drawing up schemes that will impact on historic buildings.</li> <li>- Prioritisation of retention and reuse, with sensitive refurbishment or adaptation where necessary.</li> <li>- The difference between buildings of traditional construction (generally those built before 1919) and modern construction, and the need for different approaches to adaptation and retrofit, including promoting a ‘whole building’ approach.</li> <li>- The need to consider measures that will improve energy efficiency and/or improve a building’s resilience to the impacts of climate change (such as increased rainfall, flooding or overheating), while avoiding ‘maladaptation’ that harms the building (and potentially the people inside it) or negatively impacts its performance.</li> <li>- The potential for use of alternative approaches to grant consent across a geographical area or estate, for example Local Listed Building Consent Orders or Heritage Partnership Agreements.</li> </ul> <p>Historic England produces a wide range of <a href="#">advice on energy efficiency and retrofit in historic buildings</a>, including a 2024 advice note on Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England Advice Note 18). We have also produced an advice note on <a href="#">Listed Building Heritage Partnership Agreements</a> (Historic England Advice Note 5). Please also see our responses to section 2.4 where we discuss reuse of historic buildings for housing, and 5.3 where we discuss embodied carbon.</p> <p>The need to adapt the historic environment in response to climate change extends beyond buildings to London’s historic streets, parks and waterways. This new policy could therefore integrate with, and complement, policies for adaptation of the city more</p>
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		<p>generally. These are discussed in sections 5.5 (green and open spaces), 5.10 (flood risk management) and 5.18 (heat risk).</p> <p><b>National Development Management Policies and London Plan heritage policies</b></p> <p>We acknowledge that if national policies for heritage are introduced then London Plan policies, including HC1 <i>Heritage conservation and growth</i>, will need to be reviewed to avoid duplication. We agree that there remains a need for policies on World Heritage Sites and on strategic views.</p> <p>In any review of Policy HC1, it should be recognised that the policy goes beyond current NPPF requirements in a number of respects. For example, HC1 describes how boroughs should develop and use evidence on their historic environment, and elaborates on approaches to specific issues such as cumulative impacts, archaeology and Heritage at Risk. Consequently, care would need to be taken to draw out and potentially clarify any aspects of the current policy that are complementary to national policy. We would expect this to include and potentially expand upon areas of the policy and supporting text that are particular to London, for example in relation to archaeology:</p> <ul style="list-style-type: none"> <li>- The <a href="#">Greater London Historic Environment Record (GLHER)</a>: unlike elsewhere in England this resource is provided by Historic England. It enables London boroughs to meet a statutory duty legislated for, but not yet enacted, under the Levelling Up and Regeneration Act. The GLHER is supported by the Greater London Archaeology Advisory Service (GLAAS) which provides advice to all local planning authorities except Southwark.</li> <li>- London's <a href="#">Archaeological Priority Areas</a>: a tiered system to raise awareness of archaeological potential across the capital.</li> <li>- The role of archaeology as part of the visitor economy, place shaping, public realm design and in relation to wellbeing. There may be scope for a new supplementary planning document to promote best practice in London.</li> </ul> <p>There is also an opportunity to incorporate new policy that responds to London's unique characteristics, for example:</p> <ul style="list-style-type: none"> <li>- The historic and strategic importance of the Thames (see response to section 5.9)</li> </ul>
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		<ul style="list-style-type: none"> <li>- Community heritage, including use of the London Heritage Engagement Strategy (developed by the GLA, Historic England, National Lottery Heritage Fund and the London Borough of Newham among others) as a toolkit for collecting information about what aspects of their local heritage people value.</li> </ul> <p>Finally, it would be helpful if Policy HE1 specified that where a proposed site allocation, or development proposal, may result in harm to the significance of heritage assets, it should be informed by a proportionate Heritage Impact Assessment. Our guidance on <a href="#">Site Allocations in Local Plans</a> (Historic England Advice Note 3) provides further advice on the former, while our guidance on <a href="#">Managing Significance in Decision Taking</a> (Good Practice Advice in Planning 2) deals with the latter. Our guidance on <a href="#">Planning and Archaeology</a> (Historic England Advice Note 17) also includes a section on plan-making.</p> <p>Historic England is engaging with the GLA's ongoing review of the LVMF. We would be pleased to assist with any associated review/update of Policies HC3 <i>Strategic and Local Views</i> and HC4 <i>London View Management Framework</i>.</p> <p>In relation to Policy HC2 <i>World Heritage Sites</i>, we wish to highlight that since the adoption of the London Plan, UNESCO has published new guidance on <a href="#">Impact Assessment in a World Heritage Context</a>. At present, developers frequently do not use this at an early enough stage in the planning process. We request that the new London Plan identifies the need to use this guidance, which will help avoid problems or delays at planning application stage.</p>
52-53	4.5 Designing the homes we need	<p>The consultation document very briefly considers the design of new homes, signalling the need to find a balance between necessary requirements and the delivery of more homes, particularly affordable housing.</p> <p>As we have discussed in our response to sections 4.1 <i>building height and scale</i> and 4.2 <i>tall buildings</i>, Historic England strongly supports the London Plan's design-led approach to new development. We would be pleased to support you with any further refinements to policies for design and housing insofar as</p>

		<p>they relate to the historic environment, local character and identity.</p> <p>We are of the firm belief that affordable housing can be designed and developed in a way that creates successful places by responding to context and character. For example, the Bourne Estate in Camden shows how new build affordable housing can be successfully incorporated into a historic estate amongst listed buildings.</p>
53	4.6 Heat risk, ventilation and overheating	<p>Please refer to our response to section 4.4 <i>London's heritage</i> which highlights the special considerations when adapting historic buildings in response to climate change. With this in mind, we would welcome a bespoke policy approach to addressing heat risk and overheating as part of a new policy on adaptation and retrofit of historic buildings.</p> <p>We have also discussed the role of urban greening in addressing heat risk in our response to section 5.18.</p>
55-56	4.10 Designing for everyone	<p>We support the idea that the new London Plan should continue to promote design of new developments that responds to Londoners' diverse needs. We believe that this is not just about new buildings and places, but also about understanding how people use existing places, and what they value about their local heritage.</p> <p>Greater emphasis could be placed by Policy D5 <i>Inclusive design</i> on understanding, managing and celebrating the tangible and intangible heritage that people value in their local area. This includes not just physical buildings, but also cultural practices.</p> <p>Historic England has been working with the GLA and other partners to develop an approach to engaging communities to understand what they value about the heritage of their area (see our response to section 3.6). There is an opportunity to develop this work to create a toolkit to support the implementation of London Plan policies such as HC5 and D5. This could include a simple template for collecting information through a survey, interview or focus group. We would be pleased to work further with you on this.</p>
<b>5. London's infrastructure, climate change and resilience</b>		
58	5.1 Energy efficiency standards	<p>Historic England recognises that climate change is one of the greatest challenges of our time. The built environment is a major consideration in addressing this challenge. Buildings are one of the largest contributors of UK carbon emissions and can emit carbon</p>

		<p>dioxide throughout their whole lifecycle, including through their construction and demolition.</p> <p>The consultation document considers the London Plan's energy efficiency standards for buildings, and their relationship with national Building Regulations. We therefore wish to highlight that the guidance within Building Regulations approved documents includes special considerations for buildings of architectural or historic interest. If the plan is to align with, or exceed, national Building Regulations then it would be helpful if attention was drawn to these special considerations, which are summarised on <a href="#">Historic England's website</a>.</p> <p>More generally, there will be some circumstances where it is not desirable to apply generic energy efficiency standards to historic buildings, and we suggest that any future policy makes allowances for this.</p> <p>Elsewhere in this response, we have signalled our support for a bespoke approach to adaptation of historic buildings in response to climate change. Such a policy could cover a range of potential adaptations, including energy efficiency measures (see section 4.4).</p>
59	5.2 Heat networks	<p>Heat networks present an opportunity to develop low carbon, area-based solutions to heating the built environment, including historic buildings. Cross-boundary working between boroughs will be key to optimising their use and efficiency.</p> <p>Historic England is working positively with the owners and developers of heat networks, local planning authorities and other agencies, to support their expansion in a way that conserves, and where possible enhances, the historic environment. Further information on heritage considerations for heat networks can be found in Historic England Advice Note 18 on <a href="#">Adapting Historic Buildings for Energy and Carbon Efficiency</a>.</p> <p>Some parts of London contain many designated heritage assets, such as listed buildings and scheduled monuments, as well as areas of high archaeological potential. Archaeology will often be an important consideration when designing heat networks, due to the common use of underground pipework.</p>

		<p>Early scoping of historic environment considerations (including use of the <a href="#">Greater London Historic Environment Record</a>, and <a href="#">Archaeological Priority Areas</a>) is an important way to de-risk schemes. Where potential impacts are identified, pre-application discussions with key stakeholders would be beneficial, including Historic England, the Greater London Archaeology Advisory Service and local authority conservation advisers, as appropriate.</p> <p>Our comments on the adaptation of historic buildings in section 4.4 of this response will also be relevant to heat networks.</p>
59-60	5.3 Whole life-cycle carbon (WLC) and Circular Economy (CE)	<p>Historic England supports a whole-life carbon and circular economy approach to development. Whole-life carbon is the sum of a building's embodied and operational carbon. Embodied carbon is the carbon released during construction, repair, maintenance, alteration or demolition phase of a building. Consequently, by keeping historic buildings in use and in good condition, we can help to limit carbon emissions by limiting embodied carbon. This is <a href="#">consistent with the circular economy approach</a> in which products and materials are kept in circulation through processes like maintenance, reuse, refurbishment and recycling.</p> <p>The London Plan can play an important role in encouraging the consideration of embodied carbon emissions in the built environment. Neglecting to consider these emissions could result in the installation of carbon-intensive energy efficiency measures that paradoxically lead to an increase in a building's whole-life carbon emissions. It is therefore essential that operational and embodied carbon emissions are both carefully considered, so that the whole-life emissions of the building stock can be effectively reduced.</p> <p>Alongside a whole-life carbon policy, Historic England supports the idea of a separate London Plan policy for the adaptation and retrofit of historic buildings. This should prioritise the retention and reuse of buildings of heritage interest, with sensitive refurbishment or adaptation where necessary. Further suggestions on how to develop such a policy are contained in our response to section 4.4. Please also see our response to section 2.4 on reuse of historic buildings for housing.</p>

		<p>In addition to this, as policies on embodied carbon and whole life carbon will play a part in establishing the circumstances where it is acceptable to demolish a building, it is essential that these complement and do not override policies for the conservation of heritage assets. We therefore welcome recognition within the consultation document that any framework for the retention or demolition of a building will need to be considered alongside other planning considerations, including heritage.</p>
61-63	<p>5.5 Green and open spaces</p> <p>5.6 London's open spaces</p>	<p>Historic England supports the Mayor's aspiration of increasing access to green space and tree cover across London, to support the health and wellbeing of communities. As many of London's parks and open spaces are heritage assets, this will in turn increase people's access to heritage, with complementary benefits for health and wellbeing. Our research and strategy for <a href="#">wellbeing and the historic environment</a> can be found online.</p> <p>Greater London contains 168 registered historic parks and gardens, ranging from the Royal Parks to modest London Squares. These include many public parks of varying scales which are also often associated with historic buildings. It would be helpful if the plan referred more explicitly to London's rich open space heritage.</p> <p><b>Local Nature Recovery Strategies</b></p> <p>We welcome the idea that the London Plan should have a role in relation to London's emerging Local Nature Recovery Strategy (LNRS). Natural and historic environments are inseparable and human activity over time has helped to create and sustain key habitats.</p> <p>Using the historic environment to inform nature recovery measures will result in more effective responses to the climate and nature emergencies, while helping to conserve our cultural heritage. Further information can be found in our technical guidance on <a href="#">nature recovery and heritage</a>.</p> <p>Historic England will continue to engage positively with the GLA on its emerging LNRS. We have agreed to adapt our detailed advice into an annex to the strategy to assist developers and land managers to deliver integrated projects. We would also be pleased to provide you further advice on how London Plan policy can integrate consideration of heritage with nature recovery.</p>

		<p>Please also see our comments on section 2.10 about coordination between any major new Green Belt development and Local Nature Recovery Strategies.</p> <p><b>Identifying open space deficiencies and required actions</b> The consultation document signals that greater attention could be paid to the quality of open spaces when identifying deficiencies that need to be addressed. The condition of London’s historic parks and open spaces is variable. In some cases, they are in poor condition or in need of investment and may be included on the <a href="#">Heritage at Risk Register</a>. London Plan Policy G4 <i>Open space</i> could direct investment and positive management actions to historic parks that are in poor condition or identified as ‘at risk’.</p> <p><b>Metropolitan Open Land and Green Belt</b> Bearing in mind recent changes in national planning policy, Historic England understands the proposal to redraft sections of the London Plan to distinguish between MOL and Green Belt. This should be subject to continued robust protection for MOL as part of the London Plan.</p> <p>As is discussed in our response to section 2.11, many areas of MOL are of historic interest. Consequently, any assessment of potential MOL release for housing and publicly accessible open space should include an assessment of their significance, potential impacts and opportunities for access or enhancement.</p> <p>In drawing up the assessment criteria for any review, careful consideration should be given to the criteria for designation of MOL (as set out in London Plan Policy G3), which includes land that ‘contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value’.</p> <p><b>Approach to rural London</b> We note the idea of a specific policy approach to rural London. We would be pleased to engage with this insofar as it may include distinct approaches to heritage assets, or character and density.</p>
64	5.7 Green infrastructure and biodiversity	<p><b>Urban Greening Factor</b> Many of our comments on sections 5.5 and 5.6 are relevant to the London Plan’s approach to green infrastructure and biodiversity. A range of advice can be found on our web pages on <a href="#">nature recovery and heritage</a>, including Natural England’s guidance on this topic.</p>

		<p>The consultation document focuses on a specific question about implementation of the Urban Greening Factor (UGF). We broadly support the idea of greening London as a way of mitigating climate change and overheating.</p> <p>There will be situations where urban greening could impact on heritage assets and their settings, such as below ground archaeological remains, historic streets or green spaces. It would therefore be helpful if Policy G5 was adjusted to highlight heritage as a consideration. Opportunities for enhancement could be optimised by promoting planting that reinforces the historic character of streets or reinstates historic planting schemes. It will be preferable to avoid tree planting in certain locations such as where deep roots can impact on significant archaeology.</p> <p>The range of historic environment evidence referred to elsewhere in this response will assist with understanding of opportunities and risks.</p>
64	5.8 Water	<p>Historic England is pleased that London's waterways are recognised in the consultation document as vital assets that provide social, environmental and economic benefits. Their future management is of utmost importance to the city in the context of climate change, nature recovery and a growing population.</p> <p>We are keen to actively engage with the GLA, statutory agencies such as the Environment Agency and Port of London Authority, partners and property owners to find solutions to these challenges which, wherever possible, conserve and enhance heritage.</p> <p>We are particularly encouraged by the idea of a renewed focus on the River Thames. The Thames is the reason for London's location, pivotal to its development, and central to its identity. As London's largest open space, it is a fundamental part of the city's landscape. It links together the riverside settlements that now form the heart of Greater London, and is a major part of the setting of some of its most significant monuments including its four World Heritage Sites. The different layers of London's history, a global city and once the focus of a maritime empire, are clearly appreciable from the highly accessible riverbanks and by boat.</p> <p>From a heritage perspective it is difficult to overstate the importance of the Thames. Its presence in recent London Plans</p>

		<p>has diminished, and recent riverside development has sometimes missed placemaking opportunities, through insensitive design. We would greatly welcome the Thames being the subject of greater attention and are looking with partners at what evidence may need to be produced to assist with this.</p>
65	5.9 The strategic importance of London's waterways	<p>Reflecting the great importance of the Thames to heritage, outlined above, Historic England welcomes the idea of a renewed focus on the river. Planning and regeneration have delivered major public benefits for the riverside, including by opening up access. But in places, development has meant the severing of connected landscapes along the river, the creation of visually dominant development detracting from the river's scale and openness, impacts on views of important heritage assets, and missed opportunities to respond to and address the river in a coherent and connected manner.</p> <p>At present, adopted London Plan Policy SI 14 <i>Waterways – strategic</i> role, largely defers identification and consideration of the 'distinctiveness' and 'character' of the Thames to borough plans and Joint Thames Strategies respectively. The consultation document suggests that: "The plan could support and enhance the role of the Thames at the heart of London and identify strategic priorities for improvements to waterways." Historic England would support this.</p> <p>We believe there is an opportunity for Policy SI 14 to both identify strategic priorities for the Thames, and to promote development of the highest quality that reinforces local character and, in appropriate circumstances, promotes transformational change (e.g. in Opportunity Areas). A more emphatic policy title might be: "Strategic importance of the Thames and waterways". The accompanying map at figure 9.6 also ought to clearly label the River Thames.</p> <p>As an evidence base to support this policy, we hope that ongoing work to refresh the Joint Thames Strategies will provide a more complete and consistent account of the character of the Thames. These assessments are likely to be fine grained and detailed. We are therefore keen to explore how Historic England can support the GLA in producing a more focused, strategic character statement that would bridge the gap between the London Plan and Joint Thames Strategies, or other riverine management documents. This</p>

		<p>could outline the role and value of the Thames to London's heritage.</p> <p>At present, development criteria relevant to the historic character and function of the Thames and waterways can be found in a range of policies throughout the plan. For example, Policy D9 C (f), Policy SI 17 C and E. The role of the Thames in relation to World Heritage Sites is also highlighted at paragraph 7.2.3. There may be an opportunity to review and improve or rationalise some of these references.</p>
65	5.10 Flood risk management	<p>Historic England recognises the need to manage flood risk, while also increasing the resilience of properties and places to rainwater and flooding. These adaptations will have implications for the character and function of the Thames, Londoners' ability to interact with the river and other waterways, and the historic environment more generally.</p> <p>For example, new or raised flood defences in some locations may result in impacts on archaeological remains, historic walls, riverbanks and other structures. They may also impact on important views of or from the Thames, or the settings of heritage assets located on the banks of the river.</p> <p>In some cases, views of the Thames from bankside locations and walkways may be entirely obscured unless the public realm is also adapted in response to raised defences. Similarly, flood defences can have implications for access to the waterways, both for leisure use and for traditional maritime uses and industries. Some of these accessways themselves hold heritage interest.</p> <p>Conversely historic parks and wetlands may have a role to play in mitigating flood risk by providing areas to accommodate excess water during times of heavy rainfall and flood. The increased use of permeable surfaces, de-culverting/river daylighting and sustainable urban drainage systems will also have implications for the public realm and character of historic places. Particular care would be needed where these are proposed in conservation areas or historic parks and gardens.</p> <p>Some of these issues will, to some extent, be covered by adopted Policies SI 14, 15, 16, 17 (particularly parts C and E) and the plan's heritage policies. We support the retention of these policies with</p>

		modest adjustments to ensure that the character, function and historic significance of archaeology, buildings, streets and open spaces along the Thames and waterways are recognised and considered when formulating proposals to manage flood risk. This could either be achieved by adding text to existing Policy SI 12, or by adjusting the policies mentioned above.
65-66	5.11 Water management	Please see our response to 5.10
73	5.18 Heat risk	<p>Historic England recognises the need to adapt London's buildings, streets and open spaces in response to heat risk. Protecting, enhancing and expanding London's green space provision has a part to play in managing the urban heat island.</p> <p>Our suggestions for a policy dealing with adaptation and retrofit of historic buildings are provided in response to section 4.4.</p> <p>Our response to section 5.7 considers the role of urban greening in climate change mitigation.</p>
73-74	5.19 Healthy communities	Heritage has a positive role to play in promoting the health and wellbeing of Londoners, through access to historic places, visits to open spaces, volunteering and social prescribing. Our research and strategy for <a href="#">wellbeing and the historic environment</a> can be found online. We would be interested to explore with you whether London Plan policies could harness and promote the value of heritage to Londoners' health and wellbeing.

 Historic England

