



Historic England

Keep it London

Putting heritage at the heart of London's future



Foreword

London is a city of extraordinary history, vitality and diversity. It is blessed with a strong sense of self and resilience. While much of the capital has grown organically over centuries, more recently a great deal has been carefully planned. With the amount of growth proposed, it is essential we rely on a strong plan to help London grow sustainably, and with our special identity intact.

This year marks the 350th anniversary of the Great Fire of London after which, London's historic street pattern endured alongside a new, more resilient architecture. Three centuries later, St. Paul's Cathedral was an important symbol of endurance in the Second World War. And it was the war that gave birth to the listing system that protects and celebrates some of our most precious assets. Today St. Paul's is at the heart of the protected views needed to keep safe London's distinctive profile and prospect.

Historic England supports sustainable growth. We want our capital city to thrive and grow and house us all. We believe it is possible for good development to enhance our precious heritage while avoiding harm to what is special. Historic buildings can play a crucial role in place-making as London develops and grows. We call for policies in the new London Plan to encourage all those involved in London's future to act with a strong knowledge of London's historic character and what Londoners want.

London is exceptional as a world financial centre with an ancient heart. It is precisely this wonderful mix of tradition alongside modernity that attracts the business talent and millions of visitors that support our economy. We degrade the historic realm at our peril. We need respectful creative approaches to our city's heritage, from the most special, to the most familiar and the best of the very recent past, too. Historic England wants the crucial thread of heritage to be woven through the strong canvas of the next London Plan.

Heritage isn't a dusty subject. It is a fundamental part of what makes London the vibrant, successful, joyful, hard-working place it is. And in a time of great change – and some uncertainty – a solid foundation and sense of history can make us strong. Let's build on London's mighty character and diversity to keep it flourishing, distinctive and resilient. Let's Keep it London.

Historic England is grateful to the experts who came together to shape the recommendations below. And we look forward to continued good working with the Mayor and his team to help shape the future of London.

Emily Gee, London Planning Director

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Introduction

London will continue to grow. The Mayor's consultation document *A City for all Londoners* (published October 2016) highlights the projected increase in London's population from 8.8 million now to 10.5 million by 2041. As a dynamic, thriving city this means new housing, greater job opportunities, improved transport and increased investment. But a rising population and the limited supply of land for development means the impact of change is unprecedented. We must decide what sort of London we want future generations to live and work in.

The timing of this debate is important – the Greater London Authority (GLA) is now consulting on all of the Mayoral strategies including a full review of the London Plan, due for final publication in Spring 2019. The Plan sets out an integrated framework for London's development over the next 20-25 years. Historic England sees the review as a great opportunity to help shape the future planning of London. The capital's distinctive historic character is often seen as being at odds with the need for more housing, better transport and faster economic development, but this isn't the case; heritage is very much a positive force which can support growth, cement identity and create a sense of place. Heritage must inspire new plans for London and be seen as central to place-making – by integrating London's heritage into strategic planning from the outset we can build on the city's proud past and make it the heart of the city's future.

This report will form part of Historic England's response to the GLA's consultation on the London Plan. To inform the debate, we commissioned three studies to consider how heritage influences planning decisions, and how policy and practice can be improved. We then asked a panel of experts representing planning, heritage and property development to take up the debate. In a discussion chaired by Rowan Moore, architecture critic for *The Observer*, our panel considered three crucial questions.

- What are the key heritage issues for London?
- How do we balance the protection of London's unique character with the drive for growth?
- What role should Historic England play in this debate?

The three studies commissioned by Historic England were:

- *London Plan Review* (Arup) analyses the application of the London Plan's heritage policies to the management of the historic environment.
- *Characterisation of London's historic environment* (LUC) looks at how the historic environment is being assessed in London and how such data influences planning processes.
- *London's local character and density* (Allies and Morrison) explores the different character types that make London distinctive and the potential for a better policy framework to steer contextually appropriate growth.

The Debate

London – a world city of diverse qualities

It is worth reminding ourselves what is at stake here. London is special. Its enduring pattern of streets, public spaces and layers of historic development are core ingredients in the rich mix of features that make the city so wonderful and diverse. Heritage is central to London's international reputation, but it is also inextricably linked to quality of life and communal identity. If London loses its special historic character, its distinctive brand goes with it and every community will be worse off.

The historic environment delivers tangible benefits too. A study we commissioned in 2016 revealed heritage directly contributed over £2.5 billion to London's economy in 2013. In 2014, heritage tourism generated nearly £7.9 billion in spending by domestic and international visitors to London. Repair and maintenance of historic buildings in the capital directly generated nearly £3 billion in heritage-related construction sector output in 2015 (see [Heritage Counts: London- Heritage economy 2016](#)). Heritage pays its way, whether it is pulling in overseas visitors or providing the backdrop for London's dazzlingly successful cultural offer.

The challenges

Although the planning system tries to balance the protection of the historic environment with the need for growth, tensions are emerging. One message came across loud and clear from our expert panel: the need to focus on quality and place-making. What is good growth? For example densification must take place in a way that respects local character, so that London's special character is not lost.

Other issues raised at the discussion included:

- the role of heritage in strategic planning and as part of the wider development strategy for London;
- the importance of the culture agenda and its relationship with heritage;
- the changing settings of some of our prized heritage assets in central London, either at street or skyline level;
- the growth of non-contextual forms of development that can seem out of keeping with their surroundings, particularly in Opportunity Areas (brownfield land areas identified in the London Plan as having significant capacity for development);
- the challenge of appropriate locations for tall buildings;
- the need for better cooperation between councils to assess the heritage impacts of development across borough boundaries, with a focus on places regardless of administrative boundaries.

Historic England shares the panel's view that the drive for growth must not become a zero sum game, with new homes pitted against heritage. In fact, both can work well together. The London Plan has huge potential to champion heritage as a vital part of the capital's ability of delivering good growth. We have five recommendations to make this happen.



Let Londoners speak

Recommendation 1. Find out what matters to people who live and work in London.

There was a strong feeling among our expert panel that all parties – planners, heritage experts and developers – must work harder to understand what Londoners care about. Not just residents, but those who work here, national and international tourists and students who come to study in the capital. They are the clients and London must be accessible and inclusive for them all.

We also know there's a growing appetite for heritage. Our latest [Heritage Counts](#) survey has shown that membership of heritage organisations has grown considerably in the past year. The National Trust has over 4.3 million members in England (an increase of 8 per cent on the previous year), while the English Heritage Trust has over 932,000 members in England (10 per cent more than the previous year). Heritage is also becoming more inclusive. The gap in participation between those in the most deprived areas and those in the least deprived areas has decreased dramatically – from 44.4 percentage points in 2009/10 to 24.5 percentage points in 2015/16.

We need to capitalise on this enthusiasm for our collective history and heritage and ask people to contribute towards the plans that affect the character of their local place. How important is local character to their quality of life? And how sensitive to change are London's diverse places? Often the answers are very different to what the experts think.

Two related messages emerged:

- **Consult early in the process.** Too often, consultation happens when it is too late to make meaningful changes. We need to engage from the outset, using every tool at our disposal to reach as many people as possible- including through social media.
- **Make local plans more transparent.** Too many Local Plans don't explain clearly how development will affect communities, and what the opportunities are. They should provide answers to some basic questions. What will happen where I live? What is the scope for investment and how should development contribute to good growth and the identity of places?

From Historic England's perspective, heritage is intertwined with considerations about quality of life and local identity. Neighbourhood Plans offer one possible route for local communities to engage with how change can be delivered.

Celebrate London's Character

Recommendation 2. The London Plan should encourage future planning and design to be inspired by a place's historic character.

If we accept London's uniqueness is worth protecting, we must understand the character of the city's districts before planning for change. In its latest consultation document, *A City for All Londoners*, the GLA says "[London's] various 'villages' and urban quarters have developed along their own lines over the centuries and have come to form a hallmark of London's character." To truly understand London's character might seem challenging, but we have the tools to help with this. Characterisation studies tell us how places have been shaped over time and what gives an area its unique identity. This definition of local character can then help us to manage change.

One of the conclusions from the Allies and Morrison research is that *all* character types can accommodate some growth – as long as an understanding of the underlying character guides the nature of growth. The development of 19th century industrial areas is a good example. If historic grain and street pattern is respected, in most cases these areas can accommodate a wide range of designs and densities while retaining what is contextually and historically important.

Historic England believes London Boroughs should embed a character-based approach in their strategic policies for local plan-making and the management of development so heritage and place-making are interdependent on each other. There is a need for:

- more detailed consideration of the historic environment;
- deeper analysis of what historic character means in planning terms, and the sensitivity of an area to change;
- stronger recognition of the connectivity of character and heritage in a pan-London context.

This approach opens up the debate on the nature of character, moving it from pure aesthetics to include uses which attract and add vitality to historic places and enhance quality of life. We know that heritage plays an important part in our wellbeing and quality of life; in a recent [Heritage Counts](#) study, 93 per cent of residents say that local heritage has a positive impact on their personal quality of life, while 80 per cent think it makes their area a better place to live.

Early and continuous understanding of local character provides knowledge on how to cater for London's future, so as places change they also keep hold of what makes them special. This approach should be a core principle of delivering good growth.

Put heritage at the heart of London's future

Recommendation 3. The London Plan should aim to integrate heritage into the core of planning, not as an add-on at the end of the process.

Historic England believes the London Plan and other Mayoral strategies can integrate heritage as part of a dynamic growth strategy – but to do so the Plan must evolve to fulfil its potential as a champion of the city's historic character.

The London Plan is one of three tiers of planning guidance that cover heritage policies. It sits between the National Planning Policy Framework (NPPF – the Government's planning policies for England) and boroughs' own Local Plans. Arup's study reveals boroughs are more likely to turn to the heritage policies in the NPPF and their own Local Plans than the existing London Plan. Similarities between the NPPF and the London Plan mean most planners only turn to the latter for specific issues. The London View Management Framework (LVMF), for example, is valued because it deals with an issue not covered by national policy that is particularly relevant to London's growth challenge.

Heritage is fundamental to creating a sense of place; this is a huge advantage for London. To build on this strength, the London Plan should present heritage as integral to the planning process and the delivery of regeneration. As valuable as the National Planning Policy Framework is, it cannot address the essential role of heritage to the capital's future. The London Plan should focus on specific pan-London challenges, such as the need for clarity on how heritage should be valued as a key component of character and sustainable place-making. It should also use a range of tools to support this. This includes building on our own existing guidance around characterisation, setting and tall buildings, but also taking advantage of new tools. A good example is the use of a 3D model of the whole of London to achieve a truly city-wide vision.

Heritage as an inspiration can complement and reinforce London's positive aspirations. Models of densification can include tall buildings but there is a need to look at more successful models, some of which are represented in other tried and tested urban forms. This includes exploring greater collaboration between the principles of urban design and conservation.

A new heritage strategy for all

Recommendation 4. The Greater London Authority and Historic England, together with partners, should develop a London Heritage Strategy that enables recommendation 3 to happen.

We believe the time is right for a single, dedicated strategy for managing the future of London's heritage that provides strategic evidence to support and inform all Mayoral strategies, including the London Plan.

A new London Heritage Strategy should:

- increase awareness and reinforce messages about heritage's importance to the capital's economy and delivery of good growth;
- place heritage as a key component of a development strategy for London;
- set out how boroughs, the GLA and Historic England can work together to gather evidence, share best practice and develop new tools that celebrate and use London's heritage as part of its regeneration;
- identify strategic heritage priorities and policy directions for the successful management of challenging pan-London issues including the setting of World Heritage Sites, appropriate location of tall buildings and delivery of growth in strategic locations;
- provide a framework for monitoring success in the active conservation of London's world class heritage.

Above all, this strategy would show how our historic environment can inspire our plans for future London. It should provide a positive framework to steer the best ways to use and conserve our historic environment, backed by the consistent message that heritage is a valuable contributor to the sustainable development of London.

We believe the GLA should lead on bringing London stakeholders, developers and consultants together. We welcome the Mayor's pledge to "...work constructively with the London boroughs, local authorities in the Wider South East, central government, business, civil society and any other organisation that wants to join me in the interests of Londoners."

A more proactive role for Historic England

Recommendation 5. Historic England should continue to act as strategic champion for heritage and the contribution it makes to London's future.

London can evolve in wonderful ways if we nurture its special character. But putting heritage at the heart of this vision is a huge challenge, and strong voices are needed to convince people it is an essential engine for growth. We believe Historic England is best placed to lead this campaign – working with many others – in a positive, proactive way.

Pushing the value of heritage at every level

One way we recognise the intrinsic value of heritage is through listing. The reasons a historic building or place are protected resonate with individuals, London, the UK and beyond. Supported by additional research, we must broaden the debate and raise awareness of the far-reaching economic, social, cultural and environmental benefits of heritage. In doing so, we dispel the myth that heritage is a technical, specialist issue.

Historic England should frame the strategic debate around London's future growth, aligning heritage policy with sustainability and economic prosperity. There is a great story to tell about the value of heritage and its contribution to London as one of the world's greatest capital cities. London's status as a global cultural hub is a great example. Heritage is deeply embedded in this; it provides the venues, settings and inspiration for brilliant creative industries that tell some of the capital's great success stories.

Nothing is more important in this debate than Londoners themselves. Historic character is inseparable from feelings of identity and belonging – factors that affect mental health, wellbeing, confidence and quality of life. What price do we place on these?

Produce ideas, not objections

The London Plan and other Mayoral strategies cannot provide all the answers to the capital's growth needs. Historic England should play a prominent role in discussing where growth should go, and what it looks like. We will do this through our pre-application advice and statutory consultations, and also our partnerships and communication. Characterisation and its effective application in the planning system gives us the basis for positive debate by fostering an environment in which to generate positive responses to the existing qualities of London and its local places. By understanding the character of a place and its capacity to accommodate growth, it is possible to then focus on issues of sustainability and quality.

Strength through collaboration

Our case will be stronger if we work more closely with the Mayor and GLA officers, build alliances and create a network of influential individuals and organisations willing to speak out on the importance of heritage to London's future. This should include politicians, other heritage bodies, community groups and organisations representing sectors where heritage has a role to play, such as health, economy, tourism and culture.

Focus on place-making

Place-making should be central to the debate. This people-centred approach to design and planning focuses on the 'soul' of an area and the connection with the people who live there. Heritage is key to place-making and a major strength for our plans for the city's future. Historic England can and should have a broad role in place-making at a regional and local level by using case studies illustrating successes that can inspire others.

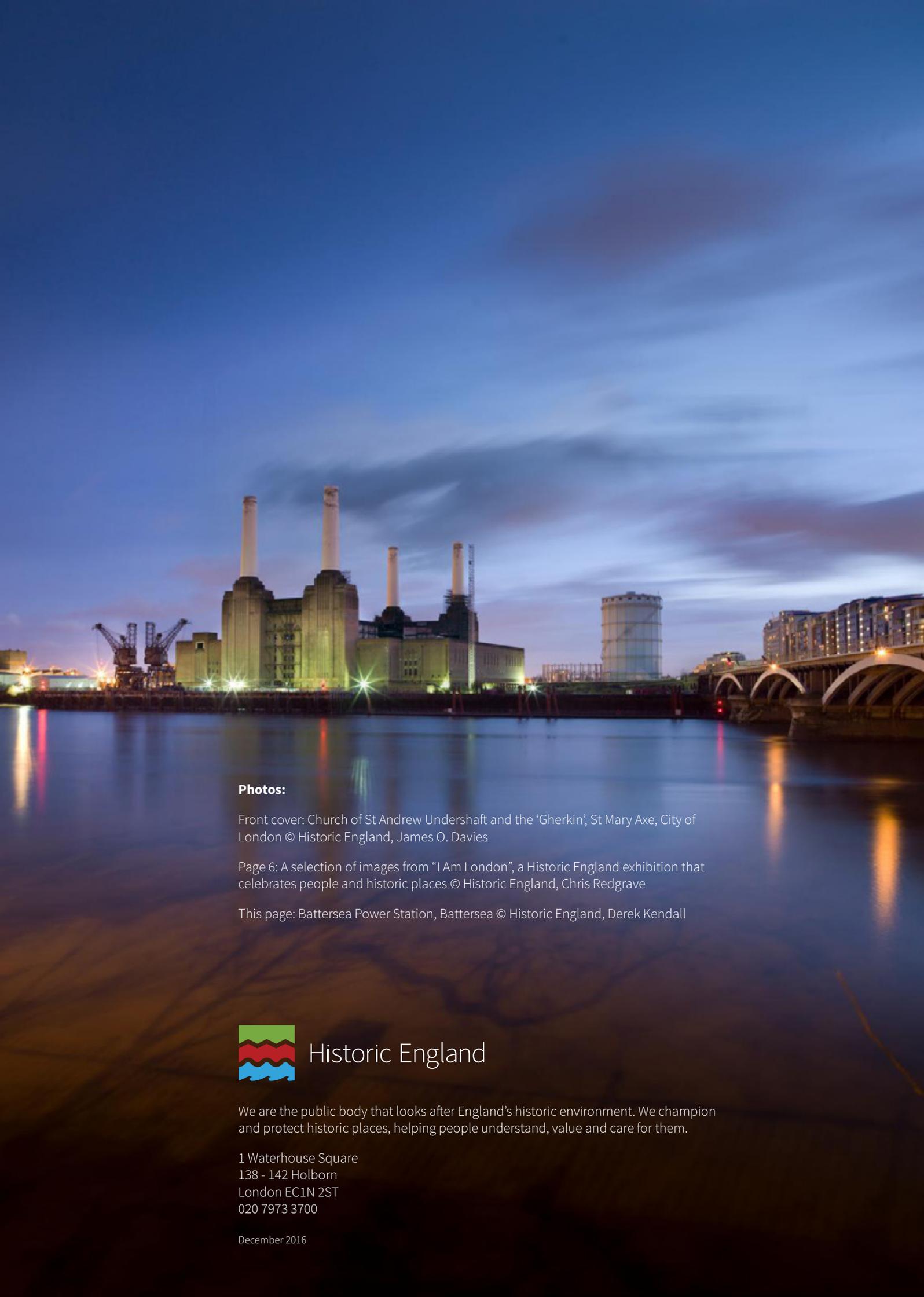
Active stewardship

We think the phrase 'active stewardship' embodies our role in managing London's historic environment. Historic England will lead on creating the strategic framework for a changing city which is inspired by its past but looks to the future, and we will work tirelessly to make this vision a reality.

Have your say

Get involved in this debate. We don't want to be looking back in 20 years' time and wondering where London's magic has gone. We have a responsibility to get this right – for London, its people and the future.

Have your say by emailing IAmLondon@HistoricEngland.org.uk or tweeting us at @HistoricEngland #KeepItLondon



Photos:

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Historic England

We are the public body that looks after England's historic environment. We champion and protect historic places, helping people understand, value and care for them.

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