



Historic England

# Consultation response to Draft London Transport Strategy





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28 September 2017

Dear Transport for London

### **Draft Mayor's Transport Strategy 2017**

Thank you for consulting Historic England on the draft Mayor's Transport Strategy 2017. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment and opportunities for its enhancement are fully taken into account at all stages and levels of planning and policy development.

We have reviewed the document against the *National Planning Policy Framework* (NPPF) and its core principle that, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system (para 8). The historic environment is a relevant matter contributing to sustainable development, as identified in paragraph 7 of the NPPF. As such, heritage assets should be conserved 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. In addition national policy requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment (paras 126 and 157).

We are keen to ensure that the Historic Environment, as an integral part of sustainable development is reflected and integrated across all relevant emerging London Plan Strategies. With this in mind we welcome the opportunity to provide comments on the draft Transport Strategy 2017. Our main considerations on the Strategy are set out below, followed by our



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some general observations. Our detailed response to specific parts of the text are contained in Appendix 1 (attached).

We would be happy to meet and discuss our recommendations for the proposed draft Transport Strategy and the opportunities and challenges for the historic environment, if this would be helpful.

## Summary of main considerations

The concepts of healthy streets, good growth, and the challenges of a rapidly growing population and achieving sustainable economic growth are clearly set out, and will have potential impacts on London's historic environment. These concepts present both challenges and opportunities for London's heritage, including its historic transport network. While the current strategy goes some way to address this, in our view there are a number of areas which would benefit from further consideration and refinement.

Historic England is already working closely with the GLA, TfL, and local authorities to promote good growth in London's historic environment, including the benefit of a character led approach to growth which identifies the challenges and opportunities for the historic environment at a strategic and local level. It is our view that this approach should be embedded in plan-making from an early stage and inform a consistent, positive strategy for the historic environment which improves the management of historic places and the design and delivery of projects. This will help ensure that the unique benefits the historic environment can bring are fully considered and integrated when planning for densification. The Transport Strategy, as a supporting strategy to the London Plan, has a key role to play in ensuring the creation of successful sustainable places which maximise these benefits.

With this in mind, we greatly welcome the inclusion of Policy 7, which seeks to maximise opportunities to protect, promote, and enhance built heritage and sites of cultural importance, in the draft Strategy. However, in order for this to be delivered we consider the Strategy needs to set out more clearly how this will be achieved in conjunction with other policies, which may demonstrate competing aims, notably in relation to delivering high density around transport nodes. In our view, the most effective way of achieving this is to clearly set Policy 7, and a requirement to consider and tailor proposals to local character, within the strategies for good growth and healthy streets.

To help achieve this we recommend that:

- The Strategy should set out more clearly the benefits of identifying and understanding the significance of the historic environment and local character at an early stage of plan-making, including opportunities for enhancement. This approach should be clearly integrated into the concepts of good growth and healthy streets and specifically included within the good growth and healthy street indicators.



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- The phrase “Maximising high-density mixed use places” should be replaced with “mixed use places that optimise density”. The NPPF states that a key principle for good design is for new development to take into account the diverse roles and characters of different areas when planning for growth. The draft Strategy should provide clear guidance as to how new places compliment local character. Likewise it should ensure that a holistic approach is taken to quality of life, so that it secures the potential environmental benefits (including the historic environment) for existing and future Londoners.
- The Strategy sets out significant aspirations for the delivery of new transport infrastructure. Historic England is engaged in many major infrastructure projects both nationally and in London and welcomes opportunities to discuss future projects at an early stage. This helps to reduce risk to both built and archaeological heritage and to deliver characterful places which deliver good growth, achieving the aspirations for Policy 7.

## General observations

In April 2017 Historic England published “Translating Good Growth for London’s Historic Environment” a report setting out the benefits of embedding the historic environment in the delivery of positive change and the contribution that the historic environment is making to the delivery of good growth. This is complemented by our “Keep it London Campaign” report which sets out our recommendations for the historic environment in the London Plan and identifies the key role heritage plays in a defining a sense of place and enriching people’s enjoyment of their environment. This builds on a number of evidence reports which we commissioned to assess the impact of current London Plan Policies, the extent of London Characterisation, and a study by Allies and Morrison on London’s Local Character and Density”. The latter has direct relevance to the proposed strategy, illustrating the benefits that early consideration of urban character in planning for densification can bring. Links to these reports are included in Appendix 1 attached to this letter.

Tfl is responsible for one of the largest estates of heritage assets in London, and is in a position to work with stakeholders to demonstrate exemplary management and contextual design. This would be in line with the approach set in respect of the natural environment, and more broadly, the Mayor’s Good Growth by Design strategy (section 5 Commissioning Quality).

Finally, we should like to stress that this advice is based on the information provided by TFL. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise and where we consider that these would have an adverse effect upon the historic environment.



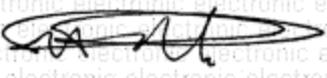
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If you have any questions with regards to the comments made then please do get back to me.  
In the meantime we look forward to continuing to work with you and your colleagues.

Yours faithfully



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## Appendix 1

### comments on text:

Page 15. Response to Consultation Question 1 – The Challenge. The Strategy sets out the magnitude of the challenges London faces. From Historic England’s perspective the challenge is managing substantial change within the existing historic environment so that new development is sustainable and integrates positively into the existing character of London.

Page 25/27. We would value including a principle for good growth stating that new development should be positively integrated into the existing character of London, so that it protects and enhances historic and cultural heritage. In our view, this would help to deliver the aims set out in Policy 7.

We welcome acknowledgement of Central London’s rich heritage. Additionally, both Inner and Outer London are made up of many neighbourhoods and local town centres with their own distinctive character which is valued by their communities, but can also present significant opportunities for enhancement. We would encourage the identification of positive local characteristics as a key approach to shape design responses and managing change across the whole city. Our London’s Character and Density Study (Allies & Morrison, 2017) sets out an approach as to how this might be achieved.

Page 35 Healthy Streets. As a key element of sustainable development identified in the NPPF we would strongly recommend that the historic environment/local character is clearly incorporated into the concept of healthy streets through inclusion in the healthy street indicators. We would welcome discussion on how this might be achieved.

Page 37 The Vision. We support the aspirations for healthier modes of transport and safety. In respect of Crossrail 2 and improvements to suburban metro services we would value a commitment to building a transport network which is not solely informed by PTAL, but which also promotes local character and seeks to integrate the best contextual design in order that Londoners feel connected and comfortable within their environment.

Page 105. We greatly welcome the acknowledgement of the role of the Historic Environment as central to the character of London (80% of tourists cite heritage and culture as key reasons to visit London, TfL). We recommend that you include archaeological priority areas among the types of heritage identified. This will help embed appropriate archaeological investigation into the planning process to ensure that development can proceed from an informed basis and levels of investigation are appropriately taken into account. This could also support opportunities for the enjoyment of London’s heritage notably through interpretation work with partners in the cultural and museum sectors.



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Page 113 Healthy Streets and Healthy People. Question 11. The policy has the potential to protect the built environment but could be strengthened through clearer explanation of how this will inform the development of proposals and their delivery and could be integrated explicitly into the healthy street and good growth indicators, as set out in our recommendations above.

There is also an opportunity to simultaneously strengthen the positive contribution that this strategy can make to the historic environment through protecting heritage assets and underlining the opportunities that regeneration can provide to address heritage assets at risk from disrepair or in need of viable use.

Page 119. As exemplified by the image, the integration of historic assets into improved infrastructure and public realm can contribute greatly to creating characterful places. There are many positive examples where TfL has implemented this approach, including at new London Overground Stations where re-vitalised railway arches and new uses and have been complimented by new public realm, accessible stations and cycle parking. However, the placing of way-finding infrastructure, cycle hire and safe cycle parking etc. needs to be carefully considered to avoid clutter and harm to the historic environment. Historic England is currently updating our Streets for All advice which gives guidance on public realm works in historic areas.

Page 191 New homes and jobs . Historic England is already engaging from an early stage on many of the infrastructure projects set out in this section. We advocate an approach that identifies heritage assets, their significance and setting, and seeks to protect this while identifying opportunities to enhance them, in accordance with the NPPF. We would advocate that TfL and the Mayor continue to take an informed approach through the draft Transport Strategy and to embed this in the healthy streets and good growth principles. New initiatives which affect the historic environment, such as new river piers should seek to avoid harm to the historic environment, enhance local character, and represent the highest standards of design. Recent works to provide new river taxi piers and boat relocations for the Thames Tideway Tunnel have sought the highest standards of design and this approach should be reflected across all new infrastructure in London so that TfL is synonymous with this approach.

Page 191 New homes and jobs. We are pleased to note the acknowledgement that growth should not be at the expense of people's quality of life. Growth which respects local character and heritage assets can bring about significant benefits and is more likely to create a sense of place, successfully integrating those elements of local character cherished by existing Londoners .

Page 192. Policy 19. The phrase “create high-density mixed use places” does not indicate how this will be informed by local character. Allies and Morrison's study on “London's Character and Density” demonstrates that nearly all historic places can accommodate growth and



densification but that this needs to integrate with local character to be successful. We would strongly recommend that more clarity is provided as to how the term “high-density” will achieve the design standards and accord to Draft Policy 7 as set out in the draft Strategy. As per our advice above, we would recommend replacing this phrase with “mixed use places that optimise density”.

Page 205 Proposal 79. We recommend this is modified to say “optimise housing delivery, enhancing the existing character of places, and new places that are positively integrated into their surroundings.

Page 254 Questions: New Homes and Jobs. The proposed aim of maximising transports potential for growth is understood and welcomed, provided the principles of good growth clearly set out the requirements to ensure that new developments are sustainable as set out in the NPPF, and seek to protect and enhance the historic environment, These should be informed by an understanding of existing character and responds positively to both the local and wider context so that both existing and future residents benefit.

Page 245 Getting the Planning Process Right. Proposal 94. As set out above, understanding the character of existing areas and embedding an approach which takes this into account when seeking to optimise growth densities will help to deliver sustainable growth. This needs to be explicit in both good growth and healthy street strategies. This approach should form part of figure 5.1.

## For reference

Documents referred to above can be found on our website:  
Translating Good Growth for London’s Historic Environment:

Keep it London: <http://content.historicengland.org.uk/content/docs/get-involved/keep-it-london-roundtable-report.pdf>

Allies and Morrison London’s Local Character and Density:  
<https://content.historicengland.org.uk/content/docs/get-involved/allies-morrison-london-local-character-density-final-report.pdf>

Streets for All: <https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/regional-documents/>

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