



Historic England

Consultation response to Draft London Environment Strategy







Historic England

Environment Team
Draft London Environment Strategy
Greater London Authority
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By Email: environment@london.gov.uk
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16th November 2017

Dear Sir/Madam,

Draft London Environment Strategy

Thank you for giving Historic England the opportunity to consider and comment on the Draft London Environment Strategy (LES); an important initiative to help ensure our capital is “*cleaner, greener and a more pleasant place to live*”.

As the Government’s adviser for the historic environment Historic England is keen to ensure that its significance is sustained and opportunities for its enhancement are fully considered in the preparation of such an important document. Uniquely in London Historic England also maintains the Historic Environment Record and provides archaeological advice to most local authorities.

Whilst the LES is not intended to be a statutory planning document we appreciate that it will inform the London Plan. Therefore it is important that it is considered within the context of the *National Planning Policy Framework* (NPPF) and its core planning principle that, to achieve sustainable development, 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.

While commending the ambitious agenda set out by the Mayor, we ask that the scope of the LES is more inclusive in terms of the other environmental issues in London, and the historic environment in particular. Our key points are:

- Although the strategy states it covers every aspect of London’s environment the scope of the strategy is limited to the themes of air quality, green infrastructure, climate change, waste, adapting to climate change and ambient noise. Historic England



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recommends that a new section is added to the LES addressing the historic environment. We would be pleased to contribute text to assist you with this.

- In this response we will emphasise how the historic environment has a part to play in achieving the strategy's objectives, and the importance of considering (avoidable) potential harm which may arise from some actions. In pursuit of targets in the natural environment it is essential to take account of effects, and opportunities, in related areas including the historic environment.
- Without addressing the qualitative aspects that the historic environment contributes, the strategy omits to engage with the complementarity of different aspects of London's exceptional environment. For instance, the benefits of a more a holistic approach to historic values inherent in green space, or the interplay of these spaces, often by design, with historic townscapes is missed.
- Historic England is keen to engage with the concept of London as a National Park City which, in line with the role and purpose of the UK's other national parks, should be a positive voice for London's cultural heritage.
- The proposed Green Spaces Commission could be a key vehicle for drawing London's historic and natural environment together, and we will wish to support this initiative.

We hope our comments are helpful. If you do have any questions then please contact David.English@HistoricEngland.org.uk or Katharine.Fletcher@HistoricEngland.org.uk in the first instance, or the named contacts within the body of this letter.

We look forward to continuing to work with you and your colleagues in finalising this very important strategy for London and in supporting its delivery.

Yours faithfully

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Appendix

Historic England's detailed comments in response to the draft London Environment Strategy Questions:

Overarching Questions

1. Do you agree with the overall vision and principles of this draft London Environment Strategy?

Historic England recognises the critical role of the LES in helping to foster a greener and cleaner capital, helping to ensure, in turn, a better quality of life for Londoners. The urgency of addressing certain issues, such as air quality, is clear.

While Historic England endorses the principles of the strategy they do not, in our view, go far enough. We recommend that the LES should go further to encompass consideration of the historic environment. The LES provides an opportunity to highlight the issues for, and the relationship between, all aspects of London's environment, as defined in the National Planning Policy Framework (NPPF, para 7, sustainable development). Including this missing dimension would make the LES better connected, and therefore more powerful and effective.

The internationally agreed definition of "Landscape" is 'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'¹. The more restricted definition of 'Natural Landscapes' in the Strategy (p.395) does not reflect this. London's green spaces, in particular, illustrate the interconnectedness of the capital's natural and historic environment. These spaces offer multiple benefits not only for their green credentials but also in their relationship with London's development over centuries. Early settlement patterns, grand Arcadian landscapes, and whole neighbourhoods designed around the interplay of landscape and townscape are all part of how London's spaces and places are experienced. Green spaces also act as 'reserves' which protect our archaeological heritage where it can be experienced by local people. The different dimensions are instrumental in drawing Londoners to these places, and boosting well-being through an enhanced sense of place and identity.

Historic England is keen to see the qualitative aspects of green space included within the principles of the LES, especially their heritage values and their role in allowing Londoners to appreciate London's historic evolution and townscapes.

¹ Article 1 of the European Landscape Convention (Adopted by the Council of Europe in 2004 and came into force in England in 2007).



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Taking the need for a holistic approach forward, the LES is also an important opportunity to consider how the Mayor's strategies work together, to ensure that there are no gaps in the coverage of the natural and historic environment, and that they are complementary.

- 2. To achieve the policies and proposals in this strategy, which organisations should the Mayor call upon to do more (for example central and local government and businesses) and what should the priorities be?*

To ensure the historic environment is effectively employed to help achieve the objectives of the LES, Historic England would encourage the Mayor to engage London's community groups, voluntary and charitable heritage sectors, the GLA and Borough's professional heritage expertise and related organisations including Historic England and our Greater London Historic Environment Record.

Historic England's suggested priority areas for the LES would be:

1. To protect, and where necessary enhance the capital's riparian and green spaces of historic interest, including the Thames landscapes, public parks, communal social spaces, gardens, squares, cemeteries and churchyards and the heritage assets within them, to ensure their positive role in the delivery of the LES is recognised and optimised. To achieve this, greater integration of work areas, and recognition of how they can reinforce each other, should be considered.
2. To support the greening of the city through additional hard and soft landscaping that recognises and responds to historic cityscape and landscape character.
3. To support the mapping of London's historic landscape (including but not limited to parks and gardens) in the LES to inform coordinated action and future funding decisions for the natural and historic environment.
4. To prioritise investment in London's open spaces, cemeteries and parks and gardens on the Heritage at Risk Register, and the designated assets within them.
5. To ensure that initiatives to improve the energy efficiency of London's historic buildings are informed and appropriate to sustain their historic significance.
6. To support initiatives such as green roofs and green walls in the right places, as these contribute to place-making, and are designed in the right way to ensure their compatibility with London's sensitive heritage assets and their setting.
7. To support recognition of historic places and spaces as havens of tranquillity in a busy city and appropriate access to and interpretation of their natural and historic interest.



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8. To actively promote higher standards in place-making through better understanding of the natural and historic environment so that London's future growth responds positively to them.
3. *Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?*



London's cultural heritage is an important asset benefiting environmental, economic and social wellbeing; contributing to, for example, the capital's identity, sense of place and community cohesion, and should therefore be given parity with other environmental matters. Historic England notes that this strategy explicitly addresses 6 particular environmental themes (air quality, green infrastructure, climate change mitigation and energy, waste, climate change adaptation, ambient noise) – and not the future of the capital's historic environment. Nevertheless the LES would benefit from a specific section in the narrative of the document illustrating how the historic environment, as an environmental matter, can help play a positive role. Historic England would be happy to support the drafting of this additional section. This would help in the delivery of the strategy's ambitions in relation to the 6 themes, and the following objective in the Integrated Impact Assessment (August 2017) can be achieved:

“To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position”.

As the historic environment is not one of the six environmental themes of the LES, it reaffirms, very strongly, the need for a clear and positive strategy for the historic environment within the London Plan itself and the preparation of supplementary planning guidance to ensure effective delivery of policies.

4. *There are a number of targets and milestones in this draft London Environment Strategy. What do you think are the main key performance indicators that would demonstrate progress against this integrated strategy?*



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Due to the importance of making best use of the existing open spaces in London, the LES provides an opportunity to enhance the condition of the city's deteriorating landscapes, particularly those on the Heritage at Risk Register. As an improvement in their condition will help to deliver the aims of the LES, Historic England suggests an appropriate indicator could be a reduction in the number of historic parks and gardens, and cemeteries on the Heritage at Risk Register. This is data that we record annually and would be pleased to share.

The most important issue to address, however, is how to ensure that targets are not pursued inflexibly, without regard for either harmful unintended consequences, or opportunities to complement other environmental agendas, and gain greater benefits in consequence. For instance:

- The densification of London has led in some instances, to high rise development with an increase in green space, but without thought for how this relates to the urban grain, townscape, old and new, or how the space is experienced and used. Some historic patterns of development can demonstrate how relatively dense developments can be achieved with shared green space, for instance garden squares or other well designed local parks, fostering community cohesion, natural surveillance and positive relationships between landscape and townscape.
- Historic England notes that the Strategy sets a target for greening; we support this ambition subject to any unintended consequences being fully assessed. We note, and support, the proposal that greening through roof gardens and green walls can contribute to the target given the difficulty of providing new open spaces. Without this being included in the calculation, increasing green space by the equivalent of three Hyde Parks (from 47-50% of Greater London) could challenge other valued qualities of London's natural, built and historic environment.
- The strategy targets in other areas, such as to increase tree cover or naturalise water courses, should be aligned with how London's designed landscapes, townscape and heritage assets are valued and experienced.

5. What are the most important changes Londoners may need to make to achieve the outcomes and ambition of this strategy? What are the best ways to support them to do this?

The LES emphasises a drive to improve the energy efficiency of London's existing buildings. As a result, the LES might refer to, for example, the guidance and advice provided by Historic England to help inform effective, and importantly, appropriate measures.

<https://historicengland.org.uk/advice/your-home/saving-energy/>



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Air Quality

1. *Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emission transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?*

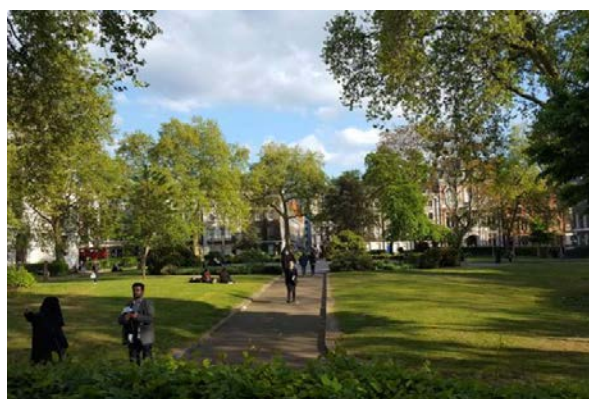
Historic England supports a determination to improve the environment of London's streets, reducing congestion, improving air quality and their condition for walking and cycling. With care, these measures can be compatible with their historic character and integrity and will increase their enjoyment by all.

Historic England's recent response to the Draft London Transport Strategy highlighted ways in which the historic environment can help inform and support the successful delivery of its objectives, notably in relation to 'good growth'² and Healthy Streets.

The LES will also help to reduce the impact on the fabric of London's historic buildings from pollutants, and the vibrations of traffic.

Green Infrastructure

1. *The Mayor's ambition is to make London a National Park City. What should the attributes of a National Park City be and what would we need to achieve for it to be considered successful?*



² Historic England's report 'Translating Good Growth for the Historic Environment' is available on our website at: <https://content.historicengland.org.uk/content/docs/get-involved/translating-good-growth-london-historic-environment-120717.pdf>



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The Environment Act 1995 emphasises the statutory purpose for national parks is to conserve and enhance the natural beauty, wildlife and cultural heritage, and to promote opportunities for the understanding and enjoyment of their special qualities.

Designating London as a National Park City provides a real opportunity to recognise a capital city that has been shaped by a landscape of historic open spaces and places; from the grandeur of the Royal Parks (some Tudor) and Georgian squares to its elegant tree lined suburbs, as well as its Victorian municipal open spaces, common land, tranquil cemeteries and churchyards, and celebrated historic trees. London has also absorbed and re-purposed many valued ancient rural landscapes, such as Epping Forest and Wimbledon Common. These should all be key attributes of a National Park City and the concept is an opportunity to identify and celebrate their significance.

To better recognise the historic dimension of all English landscapes, Historic England has over the years promoted a programme of Historic Landscape Characterisation (HLC) which has recently completed coverage outside Greater London. Completing a characterisation study for London covering both built and green environments is a priority we have identified for the London Plan and would be invaluable in recognising the contribution of these historic features. The City of London’s recent publication assessing the significance of its churchyards as a collection provides a strong case study of the contribution of historic spaces at a local level.³

Worthy of particular note will be, for example, London’s Arcadian landscape on the banks of the Thames, the ideas from which led to the formation of the English Landscape Movement. Once a Royal landscape now democratised and publically accessible, this linear oasis is the largest connected open space in the capital, stretching from Hampton to Kew. Underlining the international importance of this landscape is the inscription of The Royal Botanic Gardens at Kew on UNESCO’s list of World Heritage Sites. This site, along with the World Heritage Site at Greenwich, illustrate perhaps better than any others in London, the indivisibility of London’s natural and historic landscapes.



³ *City of London Churchyards*, City of London Heritage Strategy
<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/hes-churchyards-intro.pdf>



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2. In what ways can the Mayor help to ensure a more strategic and coordinated approach to the management of London's network of parks and green spaces?

To ensure a more strategic and coordinated approach to the management of London's network of parks and green spaces, existing information, maps and data should all be employed. The London Parks and Gardens Trust Inventory of Historic Green Spaces; Historic England's Register of Parks and Gardens, and the Greater London Historic Environment Record⁴ are all important sources of evidence to illustrate the distribution of a historic and significant patchwork of green infrastructure across the capital.

The capital's rich and varied historic environment, its conservation areas, and its celebrated parks and gardens will play an important part in helping to deliver the LES but we need to recognise their relative contribution is affected by their condition.

The State of UK Public Parks (HLF, 2016) found that no London authority expected to increase their park's budgets and most expect them to be cut.

Wanstead Park, Crystal Palace Park, and Kensal Green Cemetery are all examples of Registered Parks and Gardens on the national Heritage at Risk Register. Measures to improve their condition can in turn help to increase their contribution to a greener, cleaner more attractive city. The LES should critically explore effective measures to address the condition of these heritage assets and provide leadership in promoting their positive contribution and upkeep by others. The opportunities for funding through the Community Infrastructure Levy (CIL) should be highlighted, especially where Mayoral Regeneration Areas and Opportunity Areas border these spaces and potentially place increased demands upon them.

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Green Infrastructure:

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Greater London Historic Environment Record:

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⁴ The Greater London Historic Environment Record is the historic environment equivalent of Greenspace information for Greater London (GiGL) which is referenced in the Strategy. We suggest both should be mentioned and that the two records could usefully explore how they might work more closely in future.

<https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/>



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Climate Change Mitigation and Energy

1. *Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?*
2. *To achieve the Mayor's zero carbon ambition we estimate (between now and 2050), up to 100,000 homes will need to be retrofitted every year with energy efficiency measures. Do you agree with the Mayor's policies and proposals to achieve his contribution to this? What more can central government and others do to achieve this?*



Secondary glazing can provide effective insulation while also limiting draughts. If well designed it can be discreet and reversible.

Strategically the LES should acknowledge the positive role of the capital's historic environment in mitigating the extremes of climate change, for example, its part in moderating the effects of London's heat island.

Historic England supports the Mayor's initiative to reduce carbon emissions and would emphasise that, with care, improving the energy efficiency of a building, whether listed or in a conservation area, can be undertaken sympathetically and without compromising historic character. To support this, Historic England provides advice and guidance covering, for example, draught-proofing, insulation and ways of generating energy.

<https://historicengland.org.uk/advice/your-home/saving-energy/>

Historic England would welcome the opportunity to help inform the GLA's approach to this matter, sharing our experience and expertise in this important field, and the practical solutions that can be employed. An example of a recent initiative which may be of use is *Improving Historic Soho's Environmental Performance - Practical Retrofitting Guidance (English Heritage and Westminster City Council, 2013)*.⁵

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http://transact.westminster.gov.uk/docstores/publications_store/Improving_Historic_Sohos_Environmental_Performance_February_2013.pdf



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This highlights the opportunities and care required for initiatives within sensitive historic areas and buildings.

Historic England is keen to challenge a perception of the poor environmental performance of historic building as, for example, most traditionally constructed buildings have thick masonry walls and small windows, resulting in less actual heat loss than often assumed. Maintaining historic buildings also preserves their embedded carbon and avoids construction-related carbon costs of replacement⁶.

We would also emphasise the value of reinstating lost features that made such historic buildings perform well in the past: rainwater detailing, awnings, internal and external shutters and blinds for example. Secondary glazing, or awnings, if well designed, are other measures that can be employed to improve the energy efficiency of London's heritage assets.

We would welcome a further discussion on this important matter.

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Ambient Noise



Historic England supports the Mayor's initiative to curb excessive noise especially as London's historic places are an invaluable refuge of tranquillity, providing citizens and visitors a welcome contrast to the hustle and bustle of city life. Noise and vibration can have an adverse impact upon the experience and enjoyment of these finite and irreplaceable assets. The LES

⁶ Research on the energy efficiency of London's historic buildings is being conducted by UCL supported by Historic England ('Colouring London' Project led by Polly Hudson)



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could consider and respond to this matter referring to the explicit benefit to the historic environment of measures proposed to reduce noise, and vibration.

Supporting this point Historic England undertook research in response to the proposal for airport expansion. The report (link below) provides a methodology specifically to analyse the noise impacts on the setting of heritage assets and thus their significance.

<https://historicengland.org.uk/images-books/publications/aviation-noise-metric/>

Images: P.1 Royal Botanic Gardens Kew including Kew Palace; P.2 (above) Thamesmead including Lesnes Abbey scheduled ancient monument; P.2 (below) Hampton Court Palace and Gardens and Bushy Park; P.5 Churchyard of St Anne and St Agnes, City of London, image courtesy of City of London; P.16 Brompton Cemetery.



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