

Sara Chiong

From: Brennan, Tim <[REDACTED]>
Sent: 20 September 2024 15:07
To: Local Plan
Subject: Regulation 19 response
Attachments: Newham Reg 19 consultation response Sept 2024.pdf

Follow Up Flag: Follow up
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Dear Local Plan team

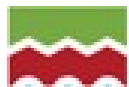
Please find the Historic England response to the current Regulation 19 consultation.

Regards

Tim Brennan

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Our ref: PL00758345

Regeneration and Planning
London Borough of Newham
Newham Dockside
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By email: localplan@newham.gov.uk

20 September 2024

Dear Local Plan Team

London Borough of Newham – Local Plan regulation 19 consultation

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Newham through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 190). Historic England has produced advice on this process which can be found here:

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>

We note the various amendments made to the draft Plan in response to the previous public consultation in 2023. In particular, we strongly welcome the amendments addressing our comments including those on policy D4 tall buildings, a number of the draft site allocations, specific reference to Heritage at Risk and in relation to the way the transition between



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'conserve' and 'transform' areas is treated in certain parts of the borough. As such, our remaining comments are limited to the Stratford & Maryland neighbourhood.

As above, we very much welcome the amendments to the relevant sections to the draft Plan. We consider these strengthen the consideration of historic environment related issues in relation to the tall building proposals that will come forward once the Plan is adopted. Nevertheless, it is clear that such proposals will have effects on the designated heritage assets in close proximity to the site allocations identified. We continue to consider that given the importance of these assets (not least as the greatest concentration of designated assets in the borough) and the likely scale of the effects from the development envisaged, further evidence and understanding should be gathered to inform the heights, scale and massing of individual development proposals. We strongly encourage a significance-based approach to addressing impacts on the historic environment through development proposals. Further details of this approach can be found in our advice documents:

- [The Setting of Heritage Assets \(historicengland.org.uk\)](http://historicengland.org.uk)
- [The Historic Environment and Site Allocations in Local Plans \(historicengland.org.uk\)](http://historicengland.org.uk)

As with our previous consultation response and discussions since, we consider that additional analysis and understanding of the significance of these assets would go further in establishing the positive strategy for the historic environment required by the NPPF. This analysis could then inform further detailed design parameters to ensure the most effective conservation of heritage significance possible in the circumstances. This would also reflect London Plan policy HC1 in using understanding and knowledge of heritage significance to enhance place-making and contextually successful development.

I trust these comments are helpful. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

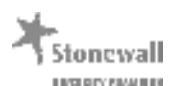
Please do not hesitate to contact me should you require any further information.

Yours faithfully



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