

DRAFT

TEMPLATE FOR POSSIBLE OBJECTIONS TO NEW SOUTHWARK PLAN (NSP) SUBMISSION VERSION - P16, P17, P18 Conservation & Heritage

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I wish to take part at the oral examination/public hearings.

TOPIC Page no, Policy Number + Name	Test of Soundness	OBJECTION / TEST OF SOUNDNESS
P16, Page 44 Listed buildings and structures	Not Effective	<p>This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.</p> <p>Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.</p> <p>Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.</p> <p>To make this policy sound, an additional point could be added to the policy P16 on the following lines:</p> <p>3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.</p>

<p>P17, pages 44-45 Conservation areas</p>	<p>Not Effective</p>	<p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>
<p>P18, page 45 Conservation of the historic environment and natural heritage</p>	<p>Not Effective</p>	<p>The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.</p> <p>The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England : https://historicengland.org.uk/listing/what-is-designation/local/local-designations</p> <p><i>“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...”</i></p> <p><i>“Moreover Local Lists are usually made very effectively in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents’ knowledge, and highlights community value assets. This is invaluable in engaging the local community in the effective conservation of their neighbourhood’s heritage. “</i></p> <p><i>“At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.</i></p> <p style="text-align: right;">Continued</p>

<p>P18, page 45 Conservation of the historic environment and natural heritage - continued</p>	<p>This was recognised in earlier planning policy documents:</p> <ul style="list-style-type: none"> * The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process". * The Peckham and Nunhead AAP 4.7.12 (2014) states "... we have also identified buildings which are worthy of being added to the council's local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to Buildings on the local list in Peckham & Nunhead include" The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark 'Local List'. * The NSP Options version from October 2014, Draft Policies and area visions states – "DM55 Local list buildings and views: Southwark will have a list of locally important buildings, structures and views that positively contribute to local character and amenity. DM55.1 Development must take these locally important buildings, structures and views into account. Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD." <p>There has been no explanation why the provision for a Local List does not appear in the NSP submission version.</p> <p>This policy could be made sound by including in it two additional points to achieve the following:</p> <ol style="list-style-type: none"> 2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas. 3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.
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