Committee(s)	Dated:
Planning and Transportation Committee	4 th July 2017
Subject:	Public
Historic Environment Strategy: adoption and publication	
following public consultation:	
Introduction	
 Archaeology and Development Guidance SPD 	
 City of London Churchyards evidence base 	
Report of:	For Decision
Carolyn Dwyer Director of the Built Environment	

Summary

The Historic Environment Strategy brings together City of London Corporation guidance on the historic environment. The Strategy is an interlinked series of documents that can be read independently. Between October and December 2016 three of these documents were issued for public consultation: an Introduction, Archaeology and Development Guidance (proposed as a Supplementary Planning Document (SPD)) and a City of London Churchyards evidence base. A small number of amendments are proposed in response to the consultation responses, set out in appendix 2 to this report.

Recommendations

- That the amendments to the Introduction, Archaeology and Development Guidance SPD and Churchyard Statements listed in appendix 2 be agreed.
- That Members resolve to adopt the amended Archaeology and Development Guidance as an SPD.
- That Members agree the publication of the Introduction and City of London Churchyards evidence base.

Main Report

Background

- 1. The National Planning Policy Framework (NPPF) states that 'Local Planning Authorities should set out ... a positive strategy for the conservation and enjoyment of the historic environment' and take into account 'opportunities to draw on the contribution made by the historic environment to the character of a place' (paragraph 126). They 'should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible' (paragraph 141).
- 2. The London Plan, adopted March 2015, encourages the identification and recording of heritage assets so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account (Policy 7.8). It states that the significance of heritage assets should be assessed when development is proposed and schemes designed (Policy 7.9).
- 3. The City of London Local Plan, adopted January 2015, includes Policy CS12 Historic Environment and Policy DM 12.1: Managing change affecting all heritage

- assets and spaces, which seeks 'to sustain and enhance heritage assets, their settings and significance'. The Historic Environment Strategy, and the adopted SPDs, are consistent with the approach outlined in the Local Plan.
- The Local Development Scheme (LDS) lists and timetables forthcoming planning policy documents. The most recent update of the LDS was approved by your Committee in June 2017 and includes the Archaeology and Development Guidance SPD.

Current Position

5. The Historic Environment Strategy brings together City of London Corporation guidance on the historic environment. The Strategy is structured as a series of documents that are linked and can be read independently. These are being produced in phases, according to priority, in line with current Historic England guidance.

Table 1 below shows the structure of the Strategy set out in the draft Introduction:

Introduction						
Characterisation of the						
Historic Environment Document						
Townscape Analysis Document						
Conservation	Buildings		Interpretation		Parks and	
Areas	and Building Recording	Archaeology	Strategy	Churchyard Statements	Gardens	
Conservation	Recording	Archaeology	Interpretation	Otatements	Registered	
Area Character	Listed Building	and	Strategy for	Churchyard	Parks and	
Summaries	Management	Development	Monuments	Statements of	Gardens in the	
and Management	Guidelines – Barbican SPD	Guidance –	and Archaeology -	Significance –	City of London – Evidence	
Strategy SPD s	Daibican SFD	SPD	SPD	Evidence	Base	
Chategy GI D 3	Listed Building	0.5	01 5	Base	Base	
	Management					
	Guidelines –					
	Golden Lane SPD					

Table 1: Strategy structure as set out in draft Introduction

- 6. On 4th October 2016 your committee agreed the draft text of the three documents (indicated in **bold** in table 1) for formal public consultation. This was structured to comply with the Supplementary Planning Guidance process as the Archaeology and Development guidance is proposed as an SPD. The Introduction and Churchyard Statements are evidence bases and not bound by the SPD procedure, but it was expedient to consult on them at the same time.
- 7. The documents were made available for formal public consultation for a six week period from 31st October 2016. Some late consultation responses were accepted

after the deadline had passed. The documents were presented to the City of London Conservation Area Advisory Committee (CAAC) on 17th November 2016.

Results of the consultation

- 8. Comments were received from the City of London Archaeological Trust, the CAAC, CGMS, the Diocese of London, Historic England, Natural England, St Helen Bishopsgate, St Paul's Cathedral, St Nicholas Cole Abbey and Transport for London. Some respondents made suggestions for amendments, but all were broadly supportive of the draft documents (appendices 1-3). The City Churchyards document has been particularly well received and was shortlisted for a Royal Town Planning Institute award.
- 9. There were queries about the wider structure of the Strategy, as set out in the Introduction (and in table 1), from Historic England. This has resulted in amendments to the structure to include a new Management of the Historic Environment SPD, containing an overarching management strategy and policy detail, which will be produced in connection with the emerging Local Plan review. This revised Historic Environment Strategy structure is set out in table 2:

Overarching documents		Subject-specific guidance
		City of London history Characterisation
		City of London townscape Analysis
	Management	Conservation Areas
	of the	26 Character Summaries and Management Strategies SPDs
	Historic	(18/26 produced to date)
Introduction	Environment	Buildings and Structures
	SPD	Assessing Significance SPD
A brief		Building Recording SPD
overview of	An	Barbican & Golden Lane Listed Building Management
the City's	overarching	Guidelines SPDs
Historic	management	City of London Archaeology
Environment,	strategy for the	Archaeology and Development Guidance SPD
the structure	City's Historic	Interpretation Strategy
and aims of	Environment,	Interpretation Strategy for Monuments and Archaeology SPD
the Strategy	including	City of London Churchyards
	national and	Statements of Significance evidence base
	local planning	City of London Parks and Gardens
	policy context	Evidence base
		Protected Views SPD
		St Paul's Cathedral and Monument

Table 2: Historic Environment Strategy structure as amended following consultation

10. Before adopting an SPD the local planning authority must prepare a consultation statement. This sets out the people consulted during the preparation of the SPD and public consultation stage, the main issued raised and explains how these were addressed in finalising the SPD for adoption. The statement is attached as appendix 1. It was felt appropriate to follow this process for the Introduction and Churchyard Statements, as these will be agreed by your Committee for publication.

11. It is recommended that a number of minor amendments to the documents are made in response to the comments received, and these are set out in appendix 2 to this report.

Corporate & Strategic Implications

- 12. The Historic Environment Strategy addresses the three Strategic Aims of the Corporate Plan 2015-19, Key Delivery Theme 1 (Future Key Places), Key Policy Priority Number 5 and the Department of the Built Environment's Business Plan. It will take account of all the City Corporation's other plans and strategies and complement key corporate objectives, such as developing the City's Cultural Hub and progressing the future City agenda.
- 13. The Historic Environment Strategy supports the Strategic aims of the Departmental Business Plan 'High quality architecture and public realm that attracts and responds to new development, enhances the historic environment and is enjoyable to experience'. These aims are met by promoting the protection and enhancement of the City's historic environment.
- 14. In preparing the Archaeology and Development Guidance SPD, regard has been had to the NPPF, London Plan, Local Plan, community strategy and other adopted SPDs in accordance with section 19 of the Planning and Compulsory Purchase Act 2004 and regulation 10 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 15. An Equality Impact Assessment Test of Relevance (appendix 6) was carried out and no equality issues were identified that required a full Equality Impact Assessment (EQIA).
- 16. A Sustainability Appraisal Screening Report (appendix 7) has been carried out, which has concluded that a full Sustainability Appraisal / Strategic Environmental Assessment is not required, confirmed by statutory consultees. Both this document and the EQIA were considered by your committee in December 2016.

Implications

- 17. The costs of preparing and consulting upon the Historic Environment Strategy will be met from existing staff resources.
- 18. There are no financial risks, legal, property or HR implications arising from the proposed Historic Environment Strategy consultation and SPD adoption process.

Conclusion

19. The Historic Environment Strategy brings together City of London Corporation guidance on the historic environment in a series of linked documents. Subject to the amendments in appendix 2 it is recommended that the Archaeology and Development guidance SPD be adopted by resolution. Under its terms of reference your Committee is authorised to adopt SPDs without reference to Common Council. It is further recommended that the Introduction and

Churchyard Statements are agreed for publication on the City Corporation's website.

20. Following adoption of the SPD, an adoption statement will be published on the City Corporation's website in accordance with statutory requirements.

Appendices

- Appendix 1 Statement of Consultation Attached
- Appendix 2 Schedule of Proposed Changes Attached
- Appendix 3 Archaeology and Development Guidance SPD Attached

The following appendices are available electronically and hard copies will also be placed in the members room.

- Appendix 4 Historic Environment Strategy Introduction
- Appendix 5 City of London Churchyards Statements of Significance example statements
- Appendix 6 EQIA test of relevance
- Appendix 7 SEA Screening Statement

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