Dear Ms Alderman

Westminster City – Scoping Report for the Integrated Impact Assessment of the Westminster City Plan

Thank you for consulting English Heritage on the Scoping Report for the Integrated Impact Assessment (IIA) of the Westminster City Plan. As the Government’s adviser on the historic environment, English Heritage is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages of the local planning process.

Accordingly, we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets 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. Having done this, English Heritage is generally content with the treatment of the historic environment in the Scoping Report subject to the following comments:

- English Heritage accepts the identification of retrofitting for improved environmental performance as a key sustainability issue for Westminster’s heritage assets as identified at Page 31 of the IIA. We would, however, add a further issue concerning the pressure for residential development and employment uses being exponentially greater and the implications that this might have for Westminster’s town centre conservation areas and their settings in particular. While the Further Alterations to the London Plan (FALP) are yet to be examined and so must not be given undue weight, English Heritage considers that the pressures they convey could present real challenges for Westminster’s historic environment in the mid to long term future;

- By way of an update to the Relevant Plans, Programs and Strategies on pages 52-58, English Heritage advises that it is currently consulting on three Good Practice Advice Notes designed to support the NPPF’s Planning Practice Guidance. The notes cover the following topics:
  - The Historic Environment in Local Plans;

31 July 2014
In addition, English Heritage notes that as well as Retrofitting Soho, there are now two other useful references concerning the retrofitting of Westminster’s historic building stock. These are:

- **Improving Historic Soho’s Environmental Performance** which is the next stage of the Retrofitting Soho project [http://transact.westminster.gov.uk/docstores/publications_store/Improving_Historic_Sohos_Environmental_Performance_February_2013.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Improving_Historic_Sohos_Environmental_Performance_February_2013.pdf); and
- the Council’s own Supplementary Planning Document on retrofitting Retrofitting Historic Buildings for Sustainability Guidance.

English Heritage recommends that the IIA Objective for cultural heritage be adjusted to better reflect the requirements of the NPPF by readings as follows: To conserve and enhance the significance of heritage assets and their settings.

Finally, I must note that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the City Plan, and which may, despite the IIA, have adverse effects on the environment.

Yours sincerely

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