

Your name	Claire Hegarty RIBA Independent Chair PHRP
Organisation Name	Peckham Heritage Regeneration Partnership (PHRP)
EiP Hearing Matter No.	Matter No. 8 Issue 01
Specific Strategy, Policy or Question	P25 Local List Q7.16
Date / time for NSP EIP	Thursday 4 March AM
The test of soundness the plan fails	The policy is not justified because: <ul style="list-style-type: none"> - it fails to include proposals for inclusive community participation in nominating and agreeing a local list. - It fails to include proposals for detailed guidance and support to be offered to owners and leaseholders of potential locally listed buildings.

OVERVIEW OF Q 7.16

Q 7.16 has two parts.

Part one: Does the policy offer appropriate protection for non-designated heritage assets in the Borough consistent with paragraph 197 of the NPPF?

Part two: Has there been progress on preparing a Local List in Southwark and how does this relate to the Heritage SPD?

This first part deals with the practical realities of making decisions on planning applications, often in the context of severe development pressures. The second part addresses the challenge of establishing a Local List which inclusively celebrates and protects heritage value across the breadth of the historic environment.

Without local listing, these two imperatives (development pressure / heritage value) are diametrically opposed in a zero sum game, with no framework for analyzing degrees of

heritage value and significance. The adoption of a Local List creates a more fertile middle ground where a shared understanding of (often modest and neglected) buildings and spaces which already exist, can be developed. Support and realistic guidance on how these buildings can be sustained or how change can be managed is also necessary.

My suggestions for additions to Policy 25 argue for a radically inclusive approach to communications, which balances the interests of the community with those of the building owner.

DETAILED RESPONSE Q 7.16 PART ONE:

“Does the policy offer appropriate protection for non-designated heritage assets in the Borough consistent with paragraph 197 of the NPPF?”

NPPF paragraph 197 refers to the need for a ‘balanced judgment’ regarding the scale of harm or loss to the significance of the non-designated heritage asset. This judgment is informed by the Statement of Heritage Significance, which sets out the heritage values of the building, and how it will be affected by proposed change. I suggest that Policy 25 commits to offering more guidance to building owners and leaseholders, who will be contributing to and commissioning the Statement of Heritage Significance

I suggest that the following text should be added to Policy 25:

3a. Detailed guidance will be developed for owners and leaseholders of locally listed buildings to provide information on the quality of analysis required in the Statement of Heritage Significance.

DETAILED RESPONSE Q 7.16 PART TWO

“Has there been progress on preparing a Local List in Southwark and how does this relate to the Heritage SPD?”

Yes there has been welcome progress. A Draft Heritage SPD was completed in December 2020, which is under consultation. This document contains Section 7.2 on Locally Listed buildings, which sets out proposals for preparing a Local List for Southwark.

My concern is that there is a lack of active proposals for encouraging and supporting community participation in nominating and agreeing a local list. Draft Heritage SPD Item 3 ‘*How Can I learn more and get Involved*’ - acknowledges the importance of community knowledge and experience, and suggest way in which people can connect and make contact with various heritage groups and organizations, and the Council’s planning decision making process.

However, in my opinion, this does not go far enough. It relies on people being able to

take the initiative, and does not address the problem that while people are deeply interested in their built heritage and environment, they often feel detached and excluded from discussions and decision making, and the planning process feels mechanistic, technical and alienating.

Surely this process of adopting a Southwark Local List (almost from scratch) is an opportunity to reconnect buildings to the space of culture and peoples' lived experience?

I note that the criteria in the Draft Southwark Heritage SPD are based on Historic England's Advice Note "*Local Heritage Listing: Identifying and Conserving Local Heritage*" (December 2020). However, the Historic England document also emphasises the importance of :

- local consultation (item 17),
- community experience and knowledge (item 20),
- communications (item 31),
- inclusivity (items 32, 34, 37)

I suggest that the following text should be added to Policy 25:

3b. The compilation of a Southwark Local List will include an inclusive process of community engagement to encourage wide participation, and to ensure that a broad range of histories, voices and experiences is reflected in both the nomination and adoption processes.