



Historic England

Neighbourhood Planning,
Policy and Strategy,
Westminster City Council,
6th Floor,
5 Strand,
London, WC2N 5HR

Our ref: PL00116612

22nd June 2018

By email: neighbourhoodplanning@westminster.gov.uk

Dear Sir/Madam,

Re: Mayfair Neighbourhood Plan Regulation 16 Consultation (May 2018)

Thank you for the opportunity to provide comments on your draft Neighbourhood Plan. As the Government's adviser on the historic environment, and a statutory consultee in the context of SEA, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the development plan 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.

Further to our advice to the Neighbourhood Forum of 26th July 2017 and 25th January 2018, Historic England welcomes the production of this document, which acknowledges the importance of Mayfair's rich heritage and seeks to promote development that responds positively to local character. We also note that the scale of ambition of this Neighbourhood Plan, specifically in relation to the proposed bold transformational change of Park Lane MPL1, is unlike any other neighbourhood plans we have commented on. As we set out in our previous advice letter, this part of Mayfair has a particularly high concentration of some of London's, and indeed the nation's, most significant heritage assets.¹ The three solutions for transforming Park Lane (or combinations thereof) that are promoted by the Plan are likely to have significant impacts on some or all of these designated assets. Due to the limited information that has been provided at this stage on the potential impacts on the heritage assets, we reserve judgment on the merits of such an infrastructure scheme, but would hope

¹ Including (but not limited to) the Grade I registered Hyde Park; Grade I listed Screen at Hyde Park Corner; Grade I listed statue of Achilles; Grade I listed Apsley House; Grade I Wellington Arch; Grade I Royal Artillery War Memorial; Grade I listed Marble Arch and Grade I listed 93 Park Lane; and the Grade II* listed Machine Gun Corps Memorial; Grade II* listed 5 Hamilton Place; Grade II* listed Dudley House; and Grade II* registered Green Park and Buckingham Palace Gardens. Furthermore, both Mayfair and Hyde Park are covered by archaeological priority areas.



Historic England, 4th Floor, Cannon Bridge House, Dowgate Hill, London, EC4R 2YA
Telephone 020 7973 3700
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that the benefits that the Neighbourhood Forum wish to achieve can be delivered in a way that enhances heritage significance.

SEA

We note from the Consultation Feedback Report 0818 that the Neighbourhood Forum disagree with our advice in relation to the requirement for SEA. We maintain our position that this Neighbourhood Plan should be subject to SEA before it is adopted. In our view MPL1 is a policy plan/program which represents a framework for projects that are likely to result in significant environmental effects when taking into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations (2004). We have included for ease of reference Schedule 1 of the Regulations below, with sections highlighted as relevant.

SCHEDULE 1

CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT

Regulations 9(2)(a) and 10(4)(a)

The characteristics of plans and programmes, having regard, in particular, to--

- (a) **the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;**
- (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- (d) **environmental problems relevant to the plan or programme;** and
- (e) the relevance of the plan or programme for the implementation of [EU] legislation on the environment (for example, plans and programmes linked to waste management or water protection).

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Characteristics of the effects and of the area likely to be affected, having regard, in particular, to--

- (a) **the probability, duration, frequency and reversibility of the effects;**
- (b) the cumulative nature of the effects;
- (c) the transboundary nature of the effects;
- (d) the risks to human health or the environment (for example, due to accidents);
- (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- (f) **the value and vulnerability of the area likely to be affected due to--**





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- (i) special natural characteristics or **cultural heritage**;
 - (ii) exceeded environmental quality standards or limit values; or
 - (iii) intensive land-use; and
- (g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

Additionally, we note that as the Neighbourhood Plan promotes a limited number of options for Park Lane, all of which amount to major interventions that will affect a number of the most highly graded heritage assets; it precludes other options which may have lesser impacts. Furthermore, while the plan footnotes two other documents where the ideas have previously been described (Mayor of London *Way to Go: Planning for better transport!* 2008 and the Grosvenor Estate Strategy from 1911) we have found no evidence to show that SEA has been carried out to support proposals described in either of these documents. Indeed, it is unclear if either document has been subject to any formal consultation, and they are not referenced or adopted as part of any relevant statutory policy documents that have been subject to environmental assessment (e.g. Westminster City Plan (2016), TfL Transport Strategy (2018)).

If you would like to discuss this matter with us further please contact me on the email address below.

Finally I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise on, and potentially object to development proposals which may subsequently arise from this Neighbourhood Plan and which may have adverse effects on the environment.

Yours sincerely,

David English

Historic Places Principal

E-mail: david.english@HistoricEngland.org.uk

Direct Dial: 020 7973 3747

cc. Mayfair Neighbourhood Forum: info@mayfairforum.org



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