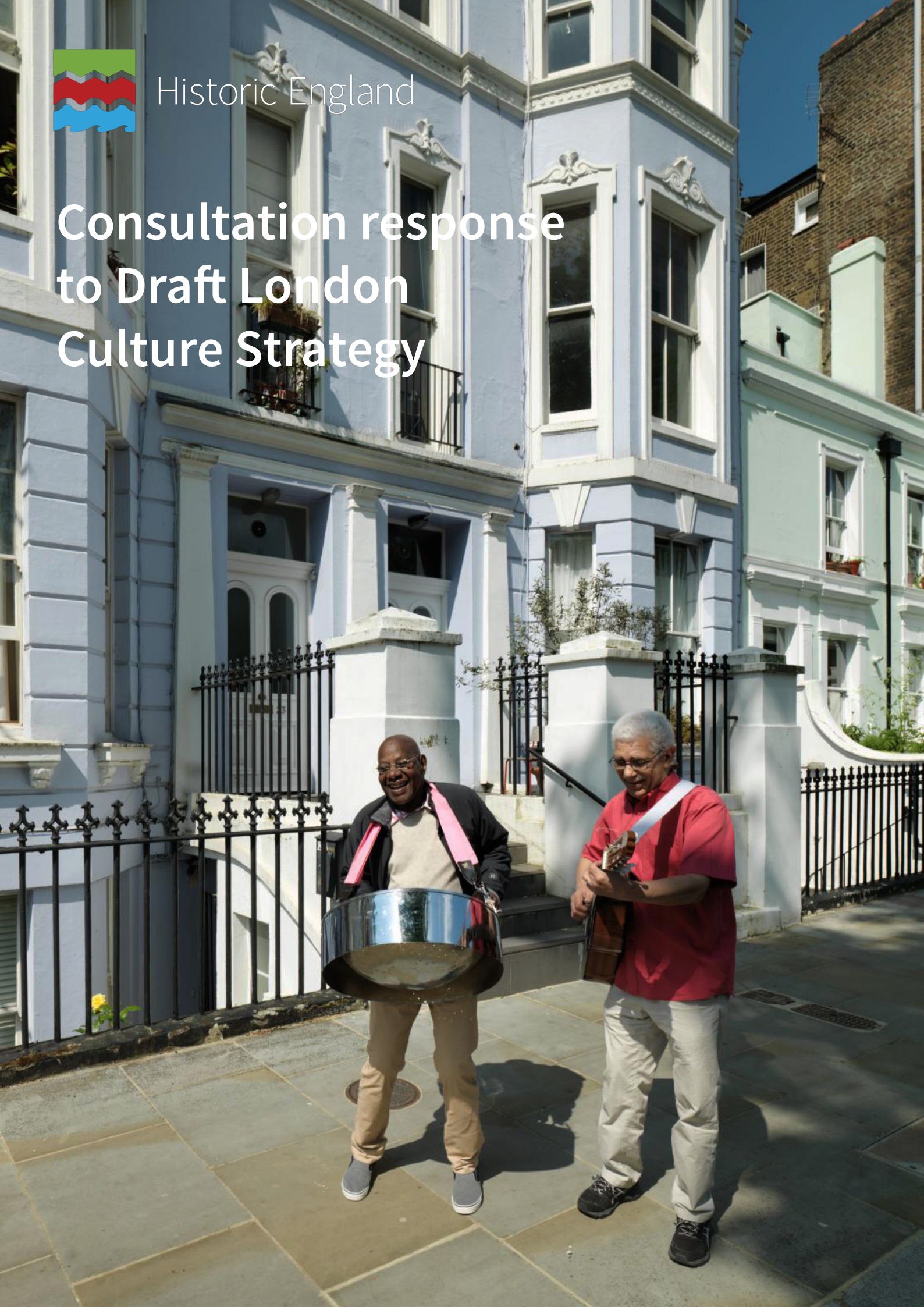


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# Consultation response to Draft London Culture Strategy





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Mayor of London  
Culture Strategy Consultation  
Greater London Authority  
City Hall  
Culture Team  
London. SE1 2AA.

Our ref: PL00033929

By email: [CultureConsultation@london.gov.uk](mailto:CultureConsultation@london.gov.uk)

19<sup>th</sup> June 2018

Dear Mayor,

### **Mayor's Culture Strategy for London - Culture for all Londoners**

Thank you for the opportunity to comment on the draft Culture Strategy. Historic England is the public body that champions and protects England's historic environment. As the Government's adviser on heritage our role is to ensure that the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring are fully understood and reflected in policy, including this Strategy. We also welcomed the opportunity to feed into earlier discussions on the Strategy as a Designated Consultative Body and would be grateful if our response of 22<sup>nd</sup> December 2017 could be read alongside this letter.

London's diverse heritage is a fundamental part of what makes the capital so vibrant and successful. It contributes to our status as a World City, as well as to our identity as Londoners, providing a sense of place and contributing to our quality of life. London's heritage and culture are intrinsically linked; the historic environment often forms the backdrop against which cultural activities take place to reflect both tradition and modernity, not just in respect of cultural venues but in the form of public spaces, parks and views, creating a remarkable experience of London. Our shared heritage draws people to the city, making it attractive for businesses, tourism and as a place to live. For these reasons we welcome the recognition given in the Strategy to the historic environment's contribution to London's cultural offer. We particularly welcome the objective to 'support, sustain and enhance heritage'; the links between Heritage at Risk and Culture at Risk; and the Mayor's commitment to supporting London's diverse heritage.

We also welcome the strong references to heritage in relation to Good Growth. Historic England is committed to the concept of Good Growth; particularly in demonstrating how London's historic environment can support successful places. For this reason we published [Translating Good Growth for London's Historic Environment](#) in April 2017. This report demonstrates that heritage is fundamental to Good Growth

because it supports good design, contributes to excellent place-making, creates value and economic growth, improves quality of life and, importantly, supports culture.

We have provided comments, including answers to the consultation questions in Appendix 1. However there are a few areas of the Strategy that we would like to draw particular attention to as we consider they would benefit from additional strengthening. These are:

- Scope of the Strategy and definition of culture
- Supporting London's diverse heritage (Policy 9)
- Recognising the contribution London's historic environment makes to tourism, the economy and employment
- A Heritage Strategy for London

### Scope of the Strategy and Definition of Culture

We welcome the inclusive view of culture taken in the Strategy, clearly including the historic environment (pg.12 and pp.42-43). However, in our view the term 'culture' needs to be applied more consistently across the strategy; it should not require further definition. As an example, Policy 4 (pg.65) commits the Mayor to promoting the benefits of *arts and culture* for the health and wellbeing of London. We recommend that this is changed to read 'the Mayor will promote the benefits of *culture* for the health and wellbeing of London.' There is a significant body of evidence that illustrates the benefits of the historic environment to wellbeing. Adapting the focus here would make the use of the term culture more consistent across the Strategy.

In addition, we would suggest a slight re-wording of the scope of the Strategy on pg.42, so it reads as follows:

*Heritage is included within the scope of this strategy, from the more traditional and established aspects of our cultural heritage to the wide variety of cultural facilities London is famous for, its many theatres, cinemas, libraries, pubs and skate parks; the places and spaces where cultural consumption takes place are often also heritage assets.*

### Supporting London's Diverse Heritage (Policy 9)

We are pleased to note the Mayor's commitment to supporting London's diverse heritage in Policy 9 and will be delighted to support the Mayor and other partners to

implement these. However, we consider that this policy could be strengthened to better reflect the text in the Supporting Diverse Heritage chapter (pp 93-95). In particular we suggest adding the following:

- The Mayor will work with Historic England and developers so that new buildings and infrastructure co-exist alongside cultural facilities and heritage.
- And
- The Mayor will also ensure that the public value of London's architectural and landscape heritage, and engagement with these, is considered fully as part of the planning process.

This would also be in line with the positive commitment (7.5) under Policy 7 to assess how new transport projects will impact on existing culture/heritage places and spaces. Throughout the Strategy the policies demonstrate an understanding of the importance of the character of places. However, in terms of supporting London's diverse heritage, the Strategy could go further in recognising the importance of London's conservation areas to supporting and enhancing special local character. Conservation areas are mentioned once (pg.33), but with over 1,000<sup>1</sup> conservation areas in London, we recommend that the Strategy makes additional references to these key areas and their importance to London's diverse and compelling character and its public realm.

Historic England also welcomes the positive reference to Archaeology and Infrastructure (pg.87). Archaeology provides many opportunities to embed culture within development, ranging from creating new visitor experiences (such as the Elizabethan Curtain Theatre and the London Mithraeum) to local community and education engagement (e.g. Barking Abbey). Archaeological discoveries can also inspire public art and public realm enhancements and garner national and international press coverage. In addition, the Greater London Historic Environment Record (GLHER) is an essential source of information for managing London's historic environment endorsed by the draft London Plan. Historic England, working with the Getty Conservation Institute, is building a new accessible system which will be available to local councils, community and special interest groups.

Therefore, in addition to the suggested commitments to Policy 9 above, we would also like to see the following additional commitments:

- The Mayor will encourage and support projects which promote public appreciation and understanding of London's archaeological heritage.

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<sup>1</sup> London has 1,025 Conservation Areas, Heritage Counts 2017 - London:  
<https://content.historicengland.org.uk/content/heritage-counts/pub/2017/lon-regional-report-2017.pdf>

And

- The Mayor will work with Historic England to promote the GLHER as a key information resource for understanding and managing the capital's historic environment.

## **Recognising the contribution London's historic environment makes to tourism, the economy and employment**

London's historic environment is an extraordinary asset that draws millions of domestic and international visitors each year. Figures from Heritage Counts<sup>2</sup> demonstrate just how important heritage is to tourism and to London's economy, for example:

- In 2015, heritage tourism generated over £13.4 billion in spending by domestic and international visitors in London
- It is estimated there were 1.9 million heritage-related domestic overnight trips, 36.7 million domestic day trips and 8.8 million international visits to London in 2015

We welcome the commitment from the Mayor, under Policy 9, to work through London and Partners to champion heritage 'as the foundation of much of the capital's unique tourism offer'. However, we consider the Strategy should give greater recognition to London's exceptional built and natural heritage, including many of the world renowned buildings, evident in the high proportion of listed buildings that attract visitors to London<sup>3</sup>.

Heritage is also a significant employer, and again figures from Heritage Counts<sup>4</sup> can complement the creative industries figures provided in the Strategy (pg.39). In 2014, there were over 30,700 people directly employed in heritage in London. Including indirect and induced employment, this number increases to over 50,300.

## **A Heritage Strategy for London**

Finally, we are very supportive of the Culture Strategy, but we repeat our call for a Heritage Strategy for London. This is needed to support local planning authorities,

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<sup>2</sup> Heritage and the Economy London 2017: <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/london-heritage-economy-2017.pdf>

<sup>3</sup> The top ten paid for and free visitor attractions in London are all heritage assets (the sites are listed buildings and/or scheduled monuments) <https://www.visitbritain.org/annual-survey-visits-visitor-attractions-latest-results>

<sup>4</sup> Heritage and the Economy London 2017 (ibid)



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neighbourhood and civic groups, developers and other stakeholders in delivering Good Growth. We understand that the Mayor is committed to producing a London-wide Heritage Strategy and would welcome a strong reference to this in the Culture Strategy.

I hope these comments are helpful and we look forward to continuing our positive engagement with the GLA, and other partners, as the Strategy develops and is implemented. We would be very pleased to discuss these points further in person, but please do not hesitate to contact me should you require any further information in the meantime.

Yours sincerely,

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## Appendix 1.

Historic England responses to consultation questions and additional comments (please note we have only responded to the most relevant questions):

### Q1 – What impact does the capital’s culture have on quality of life for Londoners? What could the Mayor do to amplify and support these areas?

Research by Historic England and the Heritage Lottery Fund demonstrates that engagement with the historic environment (including creative and cultural activities) contributes to happiness and well-being<sup>5</sup>. Heritage plays an important part of our well-being and quality of life, supporting social cohesion and inclusion.<sup>6</sup>

In our report, [Risky Business? Investing in Heritage at Risk](#) we are also able to demonstrate a considerable overlap between Heritage at Risk and the areas of greatest deprivation within London. The inference is clear; tackling Heritage at Risk in London has the potential to pay a social dividend and underlines the clear links between heritage and quality of life. Focusing heritage-led regeneration on those sites most at risk is likely to target the areas and communities in greatest need.

We share the Mayor’s concerns regarding the pressure development can have on culture and heritage, and the risks to local character and community cohesion (pg.16). We also agree with the sentiment that ‘culture and the public realm may be seen as a nice add on but not a priority’(pg.69), which can be demonstrated by the loss of conservation staff at a local authority level across London over the last 10 years<sup>7</sup>. We are already supporting Public Practice, the new social enterprise looking to build capacity within local planning authorities and would welcome opportunities to work with the Mayor to further increase capacity at a local level (and within the GLA) in terms of conservation expertise.

We welcome the steps the Mayor is taking to safeguard cultural places and spaces within the capital, which will help to support quality of life within London, as seen in policy HC7 in the draft London Plan (Protecting Public Houses) to the development of the Cultural Infrastructure Plan, for which Historic England is supplying data on Heritage Assets and Heritage at Risk in London.

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<sup>5</sup> Values and Benefits of heritage: A research review, April 2016, Heritage Lottery Fund: <https://www.hlf.org.uk/values-and-benefits-heritage>

<sup>6</sup> Heritage and Society 2017, Historic England: <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-society-2017.pdf>

<sup>7</sup> Since 2006, London has seen an overall reduction of 30% in FTE local authority staff working in conservation. Heritage Counts 2017: <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/lon-regional-report-2017.pdf>

Heritage-led regeneration can deliver a range of benefits and we welcome the commitment from the Mayor to work with Historic England to identify Heritage at Risk sites that may provide suitable spaces for cultural activities and organisations, either through meanwhile use or on a more permanent basis (p.77)<sup>8</sup>.

There are elements of London's historic environment that make a major contribution to the quality of life for all Londoners which have been overlooked in the Strategy. For example, the many places of worship (and their associated social spaces) in the capital, which offer places to reflect, celebrate diverse culture and traditions and to gather with friends and family, to London's many parks, gardens and other historic green spaces<sup>9</sup>. London's historic environment contributes to a sense of place for many Londoners and there are elements of this that could be celebrated more within the Culture Strategy.

**Q.2 Do you agree that London must embrace a broad definition of culture that includes less formal places and spaces? If yes, what could the Mayor do to best support informal culture?**

We agree that a broad definition, including less formal places and spaces, is necessary in order that the breadth of London's diverse heritage is fully represented within the Strategy. London is home to many 'less formal places and spaces'; *we have more listed pubs than listed palaces* and London is also home to the only listed skatepark in the country (the '[ROM' skatepark](#) in Havering, listed at Grade II), so we recognise the importance of the 'everyday', the less formal, cultural heritage that London is famous for and which often also benefits from some statutory protection.

The Mayor, through the London Plan, this Culture Strategy and through the development of a Heritage Strategy can ensure the implementation of policies which safeguard London's diverse cultural heritage and support local planning authorities to do the same through their Local Plans and by developing local heritage strategies.

**Q.3 How should the Mayor help to remove barriers that prevent all Londoners from securing creative jobs? What examples of good practice are you aware of in this area?**

The Strategy needs to recognise that the definition of 'creative jobs' also includes the

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<sup>8</sup> Creative and cultural industries are much more likely to be based in a listed building than any other sector, particularly creative industry start-ups Heritage and the Economy, 2017: <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-the-economy-2017.pdf>

<sup>9</sup> You can read our response to the Environment Strategy consultation [here](#).



wide range of roles within the historic environment sector, from archaeologists and planners, heritage interpretation, to those people working in traditional or craft skills trades. We provide advice, support and training to those involved in the restoration and repair of a variety of heritage assets:

<https://historicengland.org.uk/services-skills/training-skills/heritageskills-cpd/traditional-building-skills/>.

We also support a number of fully-funded apprenticeship and placement schemes (<https://historicengland.org.uk/services-skills/training-skills/work-based-training/>), including our new BAME placement programme, which we are pleased to be able to continue after a successful pilot scheme (<https://historicengland.org.uk/services-skills/training-skills/work-based-training/paid-training-placements/>). We hope these schemes will encourage people to consider seeking employment in the sector in the long-term.

#### **Q.4 How can the Mayor increase participation in the arts and cultural life of the capital, particularly for people who don't currently have access to it? Who should he be partnering with?**

We support the Mayor's ambition to increase access to local culture and heritage (pg.51) and are pleased to be able to work as a partner with the GLA on a number of initiatives such as the London Borough of Culture. Heritage provides a shared narrative and shared stories and we are also looking at ways to broaden access to London's cultural heritage through our own cultural programme, from public exhibitions such as [I am London](#), to public campaigns such as [London History Day](#), [Immortalised](#) and [HERstories](#), marking the centenary of women's suffrage, and its links to the historic environment, in 2018.

We also offer a number of free resources from podcasts to downloadable walking tours and support a number of public participation projects, such as:

- **Enriching the List:** This is a virtual volunteering project that enables users of the National Heritage List for England ('the List') to share their knowledge and photos of listed buildings and other protected heritage sites on the List: <https://historicengland.org.uk/listing/enrich-the-list/>
- **Pride of Place, England's LGBTQ Heritage:** Part of this project includes an interactive crowd-sourced map that identifies places relevant to LGBTQ heritage and history which people can add information to: <https://historicengland.org.uk/research/inclusive-heritage/lgbtq-heritage-project/>



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- **Another England:** Working with under-represented and under-researched groups to enrich the history of England, creating a public record of the places and histories important to England's Black and Asian communities, stories that are often not well-represented: <https://historicengland.org.uk/research/inclusive-heritage/another-england/>

Historic England also provides funding, through our capacity building grants to partners and local communities working on heritage projects across London. We look forward to continuing discussions with the GLA to increase participation in the cultural life of London and how we might develop our partnership, including sharing examples of our free resources and details of our developing cultural programme.

#### **Q.5 What other opportunities are there to support culture in the capital?**

The launch of the Museum of London has the potential to create a major new piece of cultural infrastructure, which will greatly enhance how Londoners view and understand their city and its heritage. The programming of the launch of this facility would benefit from sector-wide engagement and we would welcome early discussions on this, alongside other planning discussions.

Associated with this, the archaeological archives held at the Museum of London (and elsewhere) should be seen as cultural infrastructure, essential to the delivery of Good Growth. If sites are investigated in advance of development, the records and finds need to be retained, or else vital information will be lost, obviating the purpose of the intervention and compromising the mitigation strategies secured through the planning system. Therefore, archaeological archives should be included within the Cultural Infrastructure Plan.

#### **Q.6 How can you or your organisation contribute to the Mayor's vision for culture and pledge to support the final strategy?**

Historic England should be a key partner in delivering on all four of the Culture Strategy priorities. In this letter and its Appendix, we have outlined a number of areas where we are already contributing to the Mayor's vision for culture. We outline further areas where Historic England can contribute to the Mayor's vision below (this list is not exhaustive):

- **The River Thames (pg.85)**

We would welcome continued involvement in the development of a cultural vision for the Thames, having contributed to the PLA's recent Thames Vision (2016), the Illuminated River project and many other Thames Strategies and publications over the years. Raising the profile of the Thames, and the Mayor's strategic role in relation to it, was one of our comments on the London Plan<sup>10</sup>.

- **Designing for Culture (pg.87)**

The proposed suite of design guides should include reference to the historic environment and working with historic places and spaces. We'd be happy to work with the Mayor and the Design Advocates on the proposed suite of design guides.

- **Public Art (pg.89)**

We agree that public art can improve public spaces; something that Londoners have been very good at for years – from Victorian street furniture to post-war public art; many pieces of public art are listed in recognition of their special interest. We have developed guidance on the care and conservation of [Post-War Public Art](#) and look forward to continuing our discussions with the GLA Culture team on public art.

- **Healthy Streets (pg.92)**

In 2016 Historic England carried out research on the value and practice of place branding within Business Improvement Districts (BIDs), and the significant role of heritage in place brands. 89% of BIDs surveyed across the country agreed that heritage was important to their image and identity<sup>11</sup> and we would obviously be happy to support the Mayor and London's BIDs as they develop their culture strategies, it is imperative that these strategies reflect the importance of their local historic environment.

The Mayor may also be interested in our [Heritage Action Zones](#), of which there are

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<sup>10</sup> Historic England response to the draft London Plan, March 2018  
<https://content.historicengland.org.uk/content/docs/consultations/he-response-draft-london-plan.pdf>

<sup>11</sup> Heritage Counts 2016: Heritage and Place Branding,  
<https://content.historicengland.org.uk/content/heritage-counts/pub/2016/heritage-and-place-branding.pdf>



two in London (in Sutton and Walworth), which are focused on improving the experience of the high street in these areas. We would be happy to share more information and discuss the potential of Heritage Action Zones in relation to the Culture Strategy.

- **Chapter 5: Creative Londoners**

Our highly successful [Heritage Schools](#) programme provides opportunities for school children across London to get involved with their local cultural heritage and we would be keen to discuss with the GLA how this could be embedded within the Culture Strategy. At present there is no reference to Heritage Schools in the Strategy, which, in our view, is a missed opportunity to integrate this programme within the wider ambitions mentioned in the Strategy for children to engage with culture at school.

We would be particularly keen to ensure that heritage is embedded within the London Curriculum (p.106) and would welcome further discussions with the Mayor to see how we could make this happen, particularly as Commitment 11.1 states that 'the Mayor is committing to delivering the London Curriculum with a strong emphasis on culture and heritage'.

#### **Additional comments from Historic England:**

- **Mayor's Cultural Leadership Board**

As the Government's statutory adviser on the historic environment we would welcome the opportunity to contribute to this Board as a member on a permanent basis.

- **Heritage at Risk (HAR)**

As outlined above, we welcome the references to Heritage at Risk throughout the document, including the links to Culture at Risk. However, we have the following more detailed comments:

- The figures used on pg.42 are from the 2014-15 HAR Register. Can these be updated to reflect the most recent HAR Register (from 2017)? We can supply these figures.

- The examples of additions to the HAR Register given on pg.77 are from the 2016 Register (and the footnote on this page references the 2015 Register). We will be happy to supply you with examples from the 2017 Register.

Finally, it is important to note that there are many reasons for a site being placed on the Heritage at Risk Register – redundancy, vacancy, prolonged lack of maintenance etc. Whilst air pollution (pg.77) may contribute to the erosion of some historic building materials over a period of time, it is not one of the main reasons why a site will be identified as being at risk. We can provide you with more detail about our risk assessments and the most common types of buildings/sites at risk.

- **Map of heritage infrastructure (pg.59)**

We would welcome clarification if this is the same as the Cultural Infrastructure Plan (for which we are already supplying data) or an additional tool? If it's the latter, we recommend clarification of the relationship between this map and the Cultural Infrastructure Plan. We would warmly welcome the opportunity to work with the GLA to map London's heritage infrastructure, in addition to the work we are already involved with on the Cultural Infrastructure Plan.

- **Glossary A-Z**

The definition of Heritage Asset (pg. 171) should refer to the definition of Heritage Asset given in the National Planning Policy Framework to provide consistency with national planning policy.

### Image credits

**Front Cover:** Sterling Betancourt, Musician and Pioneer, Notting Hill Carnival, Powis Square. Image taken for Historic England's I am London exhibition. Copyright: Historic England.

Inside back cover: The ROM Skatepark in Havering, England's only listed (Grade II) skatepark. Copyright: Played in Britain

**Back Cover:** Wilton's Music Hall (Grade II\*), formerly on the Heritage at Risk Register, this 19<sup>th</sup> Century Music Hall is open once again, providing entertainment to Londoners and visitors to the capital alike. Copyright: Historic England.



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