

CITY
PLAN
2019 – 2040

**HERITAGE EVIDENCE
TOPIC PAPER**

UPDATED NOVEMBER 2019

Executive Summary

Westminster is a city that has been centuries in the making. Our rich heritage makes it one of the most desirable places in the world to live, work and visit – which plays no small part in our economic success. The City Plan 2019-40 sets out the council's strategic framework and ambitious vision for growth. This has required us to re-evaluate and amend our adopted policies where necessary.

The current Unitary Development Plan heritage policies have served us well, but these are now outdated. Through the new City Plan we are looking to create a more user-friendly approach to policy; in line with the National Planning Policy Framework (NPPF). As a result, we have developed one single, focused heritage policy, which has evolved and been strengthened by continued consultation with our key stakeholders. This paper explains the rationale behind our draft policy.

At the heart of the policy is the need to fully understand our heritage assets. This goes beyond our historic buildings to include their settings, the wider historic environment - our Royal parks, historic open spaces and archaeology. These assets are each valuable and irreplaceable as part of the story of how Westminster has developed. Policy seeks to recognise and protect their unique qualities. However, we also recognise that some assets hold greater significance and are more sensitive to change than others, and the greatest level of protection will be applied to these.

Our historic buildings and open spaces provide a rich source of leisure, cultural and educational pursuits. Visitor studies show that the UK's most visited tourist attractions include historic buildings within Westminster, and our historic environment has been cited as a key reason business chooses to locate here. For Westminster's residents, the distinctive character of each neighbourhood contributes greatly to a sense of place, and community belonging. Our policy must celebrate the wider values of heritage and promote understanding of and public access to our historic buildings.

As with all policies, our approach has to be considered within the broader context of the draft Plan. Underpinning our ambitions is a strategy for 'good growth'. To achieve this, we will be looking to deliver more housing and more jobs in order to create more opportunities. Growth can be accommodated through innovative design solutions which are sensitive to, and integrate with, our historic architecture. By doing so, we maintain Westminster's distinctive character and unique qualities. Westminster's Building Height study supports a managed approach, whereby higher and larger buildings are located in areas where there are less heritage constraints.

As noted by the NPPF, a positive strategy must be put in place to protect those assets most at risk of neglect, decay or any other threat. Historic England's Heritage at Risk Register identifies less than 1% of our buildings within this category and none of our conservation areas or historic parks have been identified as being at risk. However, the most significant asset in Westminster which has been considered at risk is our World Heritage Site: The Palace of Westminster and Westminster Abbey (including St Margaret's Church). There is a need for strengthened policy which fully communicates the significance of this site as being one of Outstanding Universal Value (OUV).

Following our City Plan informal consultation period in 2018, a number of objections were received. Some consultees noted that terminology in the plan was inconsistent with legislation and the NPPF. There was also a call for Westminster's heritage to be more comprehensively, and positively addressed throughout the plan, and for much greater emphasis to be given to its value to our communities and integral role in 'good growth'. In response, we have sought to strengthen our core heritage policy. We will also be reviewing how heritage is represented in other policies throughout the plan and amending where necessary to ensure that all assets are fully understood.

Following a full revaluation of policy, and guidance from key stakeholders, partners and neighbouring boroughs, we have worked to present a positive strategy and clearer direction for Westminster's historic environment. Policy must set out a comprehensive approach which will protect our heritage and provide a renewed focus in celebrating what it brings to Westminster. We must also look at creating new opportunities for enhancement and improving public access, so that our heritage can be truly enjoyed. What we hope to achieve is a robust policy which marries the value of our heritage assets with our ambitions for economic growth and greater-well-being of the people of Westminster.

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1. Introduction

- 1.1 Westminster's world-famous historic areas and buildings are an irreplaceable resource, of fundamental importance to the character, attractiveness and economy of our city. Ensuring we have an effective policy framework for the protection and management of heritage assets is therefore a key issue for our plan.
- 1.2 This paper provides background to the draft heritage policy in Westminster's City Plan 2040. It was initially prepared to inform amendments to draft policy and assist in addressing concerns raised at informal consultation stage of the plan in 2018. It brings together the main heritage issues we have considered in policy development, the principal sources of heritage policy, evidence and guidance which have informed the plan, as well as setting out some of the changes, threats and challenges affecting Westminster's historic environment and reasons for changes to the existing adopted policy framework and proposed changes to the informal draft policy.
- 1.3 Following Regulation 19 consultation on the draft plan, the paper has been amended with an addendum included at Section 7 to set out reasons for any changes to policy. A number of minor typographical and formatting errors have also been corrected.

2. Westminster's adopted Heritage policy

- 2.1 Westminster's current heritage policy framework is set out in the adopted Westminster City Plan (November 2016) and Unitary Development Plan (UDP). The City Plan includes a single strategic Heritage Policy S25 and other detailed policies on heritage are 'saved' as part of the Unitary Development Plan (UDP), which was adopted in 2007. The latter includes four specific policies in relation to each individual type of heritage asset (conservation areas, listed buildings, archaeology and the Westminster World Heritage Site). Other policy is not specific to heritage assets but includes heritage considerations, most notably in policy in relation to design, views and parks and gardens.
- 2.2 This has provided a long standing and well-understood framework for the protection of Westminster's historic environment. However, the detailed UDP policy is also significantly out of date, with its conservation and design policies in use since 2004 (although the plan not formally adopted until 2007). This also largely carried forward wording on heritage as set out in previous Westminster Local Plans. This therefore predates the introduction of the National Planning Policy Framework (NPPF), and PPS5 which preceded this, and the various iterations of the London Plan since it was first made in 2004. These documents have brought about a number of changes to heritage policy at national and regional levels, with the NPPF bringing about a simplified approach and change in language used around heritage protection.

3. Overview of legislation, policy and guidance

- 3.1 An important consideration in developing policy is ensuring heritage policy is up to date and reflects and has responded to the various changes in national and local policy context. Our statutory duties in relation to heritage and all key international, national and London Plan policies and guidance have been reviewed to make sure we fulfil requirements set out in legislation and policy. Some key issues identified from the policy review are set out below and fuller extracts and lists of other key policy documents in relation to heritage in Local Plans are attached at [Appendix 2](#).

Legislation

- 3.2 Statutory duties in relation to heritage assets remain largely unchanged since the adoption of the existing UDP policy. Decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular sections 16, 66 and 72). Policy must continue to reflect and acknowledge these duties.

National Policy

- 3.3 Government advice on planning for the historic environment, set out in the National Planning Policy Framework (NPPF), recognises that protecting and enhancing the built and historic environment is fundamental to achieving sustainable development¹. Section 16 Conserving and Enhancing the Historic Environment includes the key requirements for Local Plans in relation to the historic environment, setting the expectation that plans should include *a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk*. This should take into account:
- a) *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) *opportunities to draw on the contribution made by the historic environment to the character of a place*².
- 3.4 Revised policy must also more clearly reflect the language and approach to heritage management set out in the NPPF. Understanding significance is at the heart of this and is the starting point in decision-making and policy in relation to the historic built environment. In managing change to the historic environment, the NPPF makes clear that heritage assets are an *irreplaceable resource* and should be protected *in a manner appropriate to their significance* but encouraging new development which preserves their special qualities.

¹ NPPF Chapter 2, Paragraph 8 part c)

² NPPF Chapter 16, para 185

- 3.5 A further important consideration is the differentiation between designated and non-designated heritage assets. The NPPF notes that great weight should be given to the conservation of designated heritage assets, with the greatest weight attached to those assets considered to be of 'highest' significance. Outside those areas which benefit from statutory protection and designation, it recognises non-designated assets can nonetheless be of significance to local communities and contribute to historical understanding and local distinctiveness. The NPPF also states that, in some circumstances, harmful change may be permitted where there are public benefits that outweigh harm and at paragraphs 193-197 sets out the different tests to be applied in assessing proposals which would result in harm, depending on the designation and significance of the asset and degree of harm caused.
- 3.6 National Planning Practice Guidance (NPPG) recommends that Local Plans should identify specific opportunities for the conservation and enhancement of heritage assets and notes that this might for example include the delivery of development within their settings that would make a positive contribution to or better reveal their significance³. The NPPG also makes clear the need to consider the relationship and impact of other policies on the delivery of the positive strategy for conservation⁴.
- 3.7 Historic England in its role as advisor to the Government on heritage issues, has produced extensive guidance on historic environment issues relevant to policy development. Its Good Practice Advice on Historic Environment Policy in Local Plans⁵ outlines the requirements of the NPPF and advises on sources and the application of evidence, recommending that a topic paper should be prepared to accompany heritage policy.

London Plan Policy

- 3.8 The adopted London Plan (2016) requires boroughs to include policies in Local Plans identifying, protecting, enhancing and improving access to the historic environment. The new draft London Plan (first published 2017) includes more detailed policy on heritage with a clear focus on the integral role of heritage in place making, regeneration and as part of Good Growth, noting at policy HC1 the importance of *delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing*.
- 3.9 Other policy and evidence is expanded on, where relevant, in the rest of this paper.

Key issues identified from policy review to consider in policy drafting:

- 1) Need for language of policy to reflect both statutory duties and NPPF language;
- 2) Need to take different approach to different types of heritage asset, considering their significance, relevant statutory duties and differentiating between designated and non-designated heritage assets.

³ NPPG Paragraph: 004 Reference ID: 18a-004-20140306

⁴ Paragraph: 004 Reference ID: 18a-004-20140306

⁵ Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1 (July 2015)

- 3) Policy must demonstrate a 'positive strategy' for Westminster's historic environment and stress importance of the wider role of heritage.
- 4) As part of this positive strategy, there should be a focus on opportunities for enhancement wherever possible and appropriate.

4. Understanding and Assessing the Significance of Westminster's Historic environment

- 4.1 As set out above, the NPPF emphasises the importance of significance of heritage assets, and also notes the need for local planning authorities to have access to up-to-date evidence about the historic environment in their area⁶. The [draft New London Plan Heritage Policy HC1](#) further emphasises this and requires development plans to demonstrate an understanding of London's historic environment and use this to inform the effective integration of heritage in regenerative change. An understanding of the significance of Westminster's heritage assets must therefore inform policy. Some background to Westminster's heritage assets, their significance and further sources of information and evidence are set out below.

Westminster's heritage assets

- 4.2 Westminster's unique character derives in large part from both the concentration and importance of its heritage assets. We have one of the highest concentrations of listed buildings of any local authority in the country and our designated conservation areas cover around 77% of the city. This includes many of central London and the UK's best known and most cherished areas of historic townscape, famous areas of the historic West End such as Soho and Covent Garden, the area of 'constitutional London' around the World Heritage Site with its concentration of uses associated with government and the monarchy, 250 hectares of historic Royal Parks and a large section of historic river frontage. Our heritage assets date from all eras of Westminster's development and, alongside more recent development, help tell the story of the how the city has developed and provide the rich texture that make Westminster such an attractive place to live, work, visit, study and do business in.
- 4.3 Key elements of Westminster's historic environment and numbers of heritage assets are as follows:

Designated Heritage Assets

- **The Westminster World Heritage Site** (The Palace of Westminster and Westminster Abbey, including St Margaret's Church)
- **Over 11,000 listed buildings** (approximately 5% listed Grade I, 9% Grade II* and 85% Grade II)
- **56 Conservation Areas**
- **3 Scheduled Ancient Monuments** (the Chapter House and Pyx Chamber next to the Cloisters, Westminster Abbey; the Jewel Tower; and Subterranean Commercial ice-well, Park Crescent West)
- **23 Registered Historic Parks and Gardens**

- 4.4 The extent of designated heritage assets, all of which have associated list descriptions and designation information, means that our designated assets are

⁶ NPPF Chapter 16, paragraph 187

relatively well documented. Many large sites in Westminster have conservation plans, the Royal Parks all have published management plans and over 80% of conservation areas have conservation area audits, which provide characterisation for much of the city. A programme for completion of the audits will be set out in our updated Local Development Scheme and the World Heritage Site Management Plan is also under review.

Non-designated heritage assets

- 4.5 Other buildings, structures, monuments and open spaces, while not statutory listed or scheduled, can nonetheless be of architectural and historic interest or may make a significant contribution to the character and appearance of an area. These are therefore considered to be non-designated heritage assets.
- 4.6 In Westminster these include unlisted buildings of merit and local features of interest, including those identified in conservation area audits⁷ and neighbourhood plans⁸. There are other areas which, although not formally designated, benefit from other protection including London Squares protected by the London Squares Preservation Act⁹.
- 4.7 Archaeological Priority Areas (APAs) are also non-designated heritage assets. The Greater London Archaeological Advisory Service (GLAAS) have recently undertaken a review of Westminster updating these using new consistent London-wide criteria, which has significantly improved understanding of archaeological potential across the city. New APAs have been categorised into one of Tiers 1-3 while all other areas within the borough are regarded as being in Tier 4. Tiers 1-3 areas are listed below:
- **Tier One**
 - 1.1 Westminster and Whitehall
 - 1.2 Lundenwic and the Strand
 - 1.3 Park Crescent West Ice Well
 - **Tier Two**
 - 2.1 Buckingham Palace and Gardens
 - 2.2 Green Park
 - 2.3 Hyde Park and Kensington Gardens
 - 2.4 St James's Park
 - 2.5 Great Estates
 - 2.6 Marylebone
 - 2.7 Paddington
 - 2.8 Victoria Street
 - 2.9 Oxford Street/Bayswater Roman Road
 - 2.10 Watling Street
 - 2.11 St John's Wood Chapel Grounds
 - **Tier Three**
 - 3.1 Regent's Park

⁷ <https://www.westminster.gov.uk/conservation-area-audits>

⁸ <https://www.westminster.gov.uk/neighbourhood-plans>

⁹ <https://www.westminster.gov.uk/historic-parks-and-gardens>

○ 3.2 Pimlico

4.8 Each area has a published description and this information provides a detailed resource for understanding Westminster's archaeological complexity¹⁰. Further research by GLAAS on the most significant areas of Westminster is ongoing. Although the APAs are non-designated assets, the NPPF makes clear that *where non-designated heritage assets of archaeological significance are demonstrably of equivalent significance to scheduled ancient monuments, these should be considered subject to the policies for designated heritage assets.*

4.9 A list of key sources of information and evidence on Westminster's Historic Environment is set out at [Appendix 3](#). The Greater London Historic Environment Record (GLHER) also provides a valuable source of information on heritage assets and work is underway to develop further information and improve accessibility of this information. However, ongoing work needs to ensure that all aspects of the historic environment, particularly those of local significance, are appropriately understood and policy in the plan will seek to ensure a commitment to further guidance where appropriate (see also policy challenge - non-designated assets, in Section 5, below).

Key issues to consider in policy drafting:

- 1) Given the exceptional wealth and concentration of heritage assets in Westminster, we require a comprehensive policy approach. Policy should stress the importance of understanding significance and signpost sources of information in relation to different types of assets, where appropriate.
- 2) Changes in designations and new sources of evidence such as the new Archaeological Priority Areas should be accurately reflected in revised policy.
- 3) Westminster's historic environment is relatively well-documented but further work needs to be undertaken to promote understanding, awareness and access to information on all aspects of the historic environment. We should aim, where resources allow, to ensure all conservation areas have audits, prepared in line with best practice.

Westminster's Character and Built Form

4.10 The NPPF makes clear that planning policies and decisions should ensure that development is both *sympathetic to local character and history and establishes or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit*¹¹. A brief overview of Westminster's historical development and architectural character is therefore set out below to help inform a locally distinctive approach to policy in the plan. Individual conservation area audits should be referred to for more detail (see Appendix 3 for link to these and other sources of information on Westminster's history and character).

¹⁰ <https://historicengland.org.uk/content/docs/planning/apa-city-of-westminster-pdf/>

¹¹ NPPF Chapter 12, Paragraph 127

- 4.11 Westminster has a unique built form, its distinctive mix of buildings, spaces and land uses results from its historical pattern of development and position at the heart of London. With the exception of the expansive spaces of the Royal Parks, it is characterised by its dense pattern of development and urban grain.
- 4.12 Much of Westminster remained rural until the 17th century and its built form today is dominated by townscape from several key waves of development, as London spread westwards from the early Georgian period to the present day.
- 4.13 Areas such as Covent Garden and Soho have a more organic and irregular street pattern which reflects their earlier date, complex patterns of land ownership and changes in their land use character over time, but the narrow plots of terraced housing that emerged from medieval streets in the late 17th century and Georgian era have strongly influenced their character.
- 4.14 Larger scale and more formalised planned layouts with squares and crescents characterise other areas including Mayfair and Marylebone estates from the 18th century and Belgravia, Pimlico and Bayswater in the 19th century. These areas tend to have a greater uniformity of architectural character.
- 4.15 Throughout the city, the rapid development for housing during the Georgian and Victorian eras means that a significant proportion of Westminster's building stock is terraced housing from these periods. This tends to be of consistent scale ranging from 2-6 storeys and with a clear hierarchy of buildings relating to the spaces, squares, streets and mews set behind these.
- 4.16 There is, however, a rich architectural heritage from all periods across the city. The northern and western fringes of Westminster were developed later as Victorian suburbs and railways canals and transport nodes influenced and were a stimulus for their development. In areas such as St John's Wood, density is lower with large detached and semi-detached Victorian villas, set in generous gardens.
- 4.17 There are also notable enclaves of later Victorian housing including mansion flats, Peabody Estate housing and the unique area of artisan worker's housing in the Queens Park Estate, as well as innovative areas of twentieth century social housing including the Millbank Estate, Hallfield Estate and Lillington Gardens.
- 4.18 Cutting across the city, major routes such Oxford Street, Bayswater Road, Edgware Road and the Strand predate much of Westminster's development and follow the line of Roman and historic roads out of the city and some leading to earlier settlements around Paddington, St Mary-le-Bourne and Ebury. These major routes tend to have more mixed and commercial character and built form and have, throughout their history, been a focus for change and growth.
- 4.19 Natural features, open spaces and waterways have a particularly significant influence of Westminster's character. Despite its dense urban character, more than a third of the City is open space and south Westminster is dominated by the open expanse of the River Thames, lined with many landmarks. The Rivers Westbourne and Tyburn, still run north-south through the city and, although now in underground culverts, their meandering course is visible in street patterns.

- 4.20 The Westminster World Heritage Site owes much to its prominent location on the river. A cluster of Royal and religious buildings has been in this location since then 10th Century, taking advantage of the prominent location on the site of the Island of Thorney, an historic eyot within the delta created by the division of the River Tyburn as it flowed into the Thames, on the west side of Lundenwic, an Anglo-Saxon trading centre.
- 4.21 The river frontages and townscape across the city are today punctuated by many of London's best-known landmarks, institutions, famous buildings and spaces. The West End is also the location for London's theatre-land, galleries, cinemas and to central's London best known shopping streets as well as areas known for their embassies, clubs and institutions. In mixed central parts of Westminster, it is the combination of the rich legacy of buildings, the interaction of historical patterns of development and unique mix of land uses, both residential and commercial that gives areas such a distinctive character.
- 4.22 These distinctive neighbourhoods and areas are recognised and protected through designation as conservation areas and in addition certain Special Policy Areas recognise contribution of land use to distinctive character. Emerging policy needs to recognise and respond to the diverse character found across the City including Westminster's differing roles at the heart of national life and government, as a business and commercial centre, and as home to diverse residential communities. The planned grain and street pattern, distinctive building typologies and extent of uniformity will influence the form and nature of alterations and extensions and scope for intensification in and adjacent to historic areas.

Key issues identified from character analysis to consider in policy drafting:

- 1) Policy wording throughout the plan should reflect and refer to Westminster's locally distinctive neighbourhoods.
- 2) Policy should continue to ensure design responds to the existing context, taking into account the established pattern, density and scale of surrounding townscape, existing rhythms, symmetries, degree of uniformity and the composition of elevations and building lines.

Wider Value of Westminster's Historic Environment

- 4.23 In addition to understanding significance and character, the NPPF notes the need for plans to consider *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring*. Historic England Guidance¹² stresses the importance of the inter-relationship of historic environment objectives with other issues, such as maintaining a competitive economy, delivering good design and supporting renewable energy and green infrastructure. A number of

¹² [Historic Environment in Local Plans](#), Historic England Historic Environment Good Practice Advice in Planning: 1 (July 2015)

studies and documents provide information on the wider value of Westminster's Historic Environment. Some detail is set out below.

- 4.24 In Westminster, many premises for business are located within historic buildings and the historic environment therefore acts as both the setting for and a highly significant stimulus to our economic growth. Studies have previously identified the historic environment as a key reason why businesses choose to locate in Westminster¹³ and recent national research has revealed the positive impact historic buildings have on the UK economy, with listed buildings attracting a greater concentration of companies linked to the most productive parts of our economy – the creative and cultural sector and professional services. It found that the greater the density of cultural and heritage assets, the better the performance of the creative industries and the greater the level of specialisation towards the creative industries. Historic England's annual Heritage Counts Report 2018 focuses on Heritage in commercial use, noting the importance of the historic environment to commercial uses and identifies those conservation areas in England with high concentration of creative industries, showing that many of these are located within historic areas of Westminster¹⁴.
- 4.25 Historic buildings in Westminster also attract and are home to many of London's most prestigious institutions and visitor attractions, which play a vital role in the economy and cultural life of central London and the UK. Tourism is particularly important to London's economy, with over 31.9 million visitors to the capital in 2017¹⁵. The Mayor's Cultural Infrastructure Plan recognises the importance of heritage assets as part of cultural infrastructure, their vital role in London's character and economy and the need to support and protect them. Top visitor attractions include heritage buildings, theatres, museums, galleries and music venues with cultural tourists spending over £7bn a year and supporting 80,000 jobs. Visitor surveys show many of London and the UK's most visited tourist attractions are historic buildings and areas located within Westminster¹⁶, including London zoo, National Gallery, Tate Britain and Somerset House.
- 4.26 As well as attracting visitors, our historic open spaces and cultural attractions provide important recreational and learning opportunities for both local communities and Londoners, enhancing quality of life and contributing to health and well-being. Local historic buildings add to the unique character of an area, help to foster a sense of community and make an important contribution to sense of place and distinctiveness; this in turn attracts people, businesses and investment. In Westminster, our heritage assets contribute to the attractiveness and mix of local residential neighbourhoods. Areas such as the Queens Park Estate or Pimlico owe much of their appeal as residential areas to their historic buildings and many of the council's own properties and estates such as Churchill Gardens and the Hallfield Estate are also within conservation areas and include listed buildings.

¹³ The Importance of the Historic Environment to the Office Market in Westminster (2007)

¹⁴ Historic England Heritage Counts 2018 Figure 12, p24; <https://historicengland.org.uk/content/heritage-counts/pub/2018/hc2018-heritage-in-commercial-use/>

¹⁵ https://www.london.gov.uk/sites/default/files/cultural_infrastructure_plan_online.pdf

¹⁶ <https://www.visitbritain.org/annual-survey-visits-visitor-attractions-latest-results>

- 4.27 Finally, the re-use of historic buildings can also help in the fight against climate change. Demolishing buildings uses a considerable amount of energy, combined with the energy costs of producing new materials, transporting them to site and constructing a replacement building. A sustainable future will need to find ways to reuse and regenerate our existing building stock and this is particularly important for Westminster. With 80% of the building stock we will have in 2050 already here today, our older buildings will play an important role in our ability to function effectively in the future and deliver our housing and employment needs.

Key issues identified from evidence review to consider in policy drafting:

- 1) Recognising the wider value of heritage assets and the historic environment to Westminster is crucial in developing Westminster's policy framework and must be embedded in policy across the plan.

5. Policy Challenges, Issues and Opportunities for Westminster's Historic Environment

- 5.1 The range, number and quality of heritage assets in Westminster also brings a number of challenges. Some of the key challenges and issues for policy, along with opportunities these present, and proposed policy approaches to resolve issues, are set out below.

Policy challenge - Strategy for Heritage at Risk

- 5.2 The NPPF specifically notes the need for the 'positive strategy' in the Local Plan to include heritage assets most at risk through neglect decay or other threats. Vacancy, neglect and decay of heritage assets is not as significant an issue for Westminster as in other parts of London. Historic England's Heritage at Risk Register¹⁷ identifies relatively few structures and buildings in Westminster as at risk - only 20 listed buildings (less than 1%) are on the register, the majority of which have had a solution agreed or repair works started, and no conservation areas or registered parks and gardens are identified as at risk.
- 5.3 Nonetheless, challenges remain. There are buildings in Westminster which suffer from poor maintenance and neglect and there have been instances of architectural theft within buildings where development works are ongoing. Ensuring buildings do not fall into disrepair is best addressed through ensuring heritage assets are both valued and also remain in active use. Policy should continue to allow for sympathetic changes based on a clear understanding of significance, where these will allow buildings to remain in active use consistent with their conservation. It is also important applicants and residents have access to up to date technical advice and guidance on appropriate repair and maintenance of historic buildings. Westminster's advice in relation to technical aspects of historic building maintenance and repair is

¹⁷ <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

still relevant and during the lifetime of the plan SPDs will be updated where relevant and the need for technical guidance within these considered.

Policy Challenge - Protecting and Enhancing Westminster World Heritage Site and its setting

- 5.4 The most significant asset in Westminster which may be considered at risk is the Westminster World Heritage Site. A key area of challenge for emerging City Plan policy is ensuring effective policy is in place for its protection and management.
- 5.5 The Palace of Westminster and Westminster Abbey, including St Margaret's Church was inscribed as a cultural World Heritage site in 1987. The Site is of outstanding architectural, symbolic and historic significance and has enormous cultural, social, environmental and economic value as a focal point for UK government, democracy and national ceremony, as well as being one of the most visited tourist attractions in the country¹⁸. The NPPF makes clear that, as designated heritage assets of international importance, World Heritage Sites should be afforded the highest levels of protection¹⁹.
- 5.6 Over the past 10 years, the World Heritage Committee has raised concerns about the care and protection of the Westminster World Heritage Site and has threatened the site with inclusion on the World Heritage in Danger list. There has been significant pressure for large scale development in proximity to the site with the potential to impact on and harm its setting including that within Opportunity Areas in Westminster, Lambeth, Southwark and Wandsworth. A number of significant projects are also proposed within and close to the Site, including the Restoration and Renewal of the Palace of Westminster, which will impact on the site and its surroundings during the lifetime of the plan. Since the adoption of the UDP there have been three UNESCO sponsored monitoring missions to Westminster (in 2007, 2011 and 2017). The report of the last monitoring mission in 2017²⁰ provided a series of recommendations which are listed in full at [Appendix 4](#). Main issues from the mission report for policy can be summarised as follows:
- Policy documents at all levels should ensure that the protection of OUV is given the maximum weight possible as a first principle and development should have as a centrepiece, a requirement for protection of OUV.
 - OUV is poorly understood. There is a need to promote greater understanding of the meaning of OUV and better communicate this. It was also noted that in addition to meeting the criteria for inscription of world heritage sites, sites must meet conditions of authenticity and integrity and have adequate protection and management regimes in place.
 - To ensure impacts on OUV have been adequately understood, future development affecting the Site or its setting being should be supported by a Heritage Impact Assessment.

¹⁸ Westminster Abbey received 1,547,001 visitors in 2017, making it the 7th most popular visitor attraction in the UK, Houses of Parliament received 1,007,568, making it the 14th most popular in the UK. Source: <https://www.visitbritain.org/annual-survey-visits-visitor-attractions-latest-results>

¹⁹ NPPF paragraph 184

²⁰ See ICOMOS/ ICCROM Reactive Monitoring Mission Report (2017) <https://whc.unesco.org/en/list/426/documents>

- Development within the setting of the site and its cumulative impact should be better managed, with 3D modelling to promote understanding of impacts of tall buildings within the setting.

5.7 Draft City Plan policy must therefore address these recommendations and have OUV as its central focus. Policy needs to be more robustly worded to ensure the site is positively managed both to conserve and enhance OUV and seeks to ensure major development in the site and the vicinity will bring benefits to the site and its setting, including through better communication and interpretation of OUV. The location of the Site on the river means that cross-borough cooperation is particularly important, and this should be referenced within policy. Not all issues will be covered within the planning policy and wider issue of management need to be addressed within the updated World Heritage Site Management Plan.

Policy Challenge – Providing appropriate and proportionate protection to non-designated heritage assets.

- 5.8 A further challenge is ensuring our local heritage in the form of non-designated heritage assets are recognised and appropriately valued and protected. Non-designated heritage assets are defined in the NPPF *as buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets and are not protected by legislation.*
- 5.9 Westminster's adopted policy makes no reference to non-designated heritage assets but recent cases such as the demolition of the Carlton Tavern (which took place with no warning and while the site was being considered for listing)²¹ show that assets which are valued by local communities but not currently protected by any policy or designation can be at risk. Policy should also seek to ensure such assets are given a proportionate level of protection, noting the NPPF which states that decisions in relation to non-designated heritage assets, should take a balanced view having regard to the scale of any harm or loss and the significance of the heritage asset²².
- 5.10 The NPPG notes that the inclusion of information about non-designated assets in Local Plans can be helpful. While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public and notes that consistent criteria for local lists can improve the predictability of the potential for sustainable development.
- 5.11 Historic England advice suggests that Local Plans could usefully include policy on locally significant heritage assets as part of their strategy for the historic environment²³ and that Neighbourhood Plans may indicate buildings and sites which are of local interest.

²¹ Appeal Reference APP/X5990/C/15/3130605

²² NPPF Paragraph 197

²³ [Historic England Local Heritage Listing Advice Note](#) 7 p6

- 5.12 Given the extent of designated heritage assets in Westminster, it has not historically been felt necessary to have a formal local list. As most of Westminster is covered by conservation areas, conservation area audits have been used to identify 'unlisted buildings of merit' in these areas and other features and spaces of interest. It is, however, recognised that buildings spaces and features outside these areas can also be of local interest and not subject to any formal designation.
- 5.13 While it must be recognised that these may sometimes only come to light as part of the development management process, policy should set out our approach to identifying non-designated heritage assets and to their protection. This is particularly important as many of Westminster's neighbourhood forums are now developing Neighbourhood Plans and including local buildings of merit within these. With most of Westminster now covered by designated neighbourhood forums, working with local communities on plans as they come forward represents a significant opportunity to improve understanding of local heritage of value.
- 5.14 It is important that Local Plan policy recognises the importance of non-designated heritage assets, setting out what is likely to be considered a non-designated heritage asset and making clear that a proportionate approach to their protection will be taken. To provide certainty and ensure a more consistent/ transparent approach to the future identification of non-designated heritage of interest, it is also proposed further advice on the process for identifying them, including criteria, could be included in the forthcoming Heritage SPD. Historic England advice²³ also includes a section on defining the scope of local heritage listing and will form the basis of the approach. This document should be signposted in advice for the Neighbourhood Forums.

Policy challenge - Balancing Heritage Protection and Growth

- 5.15 A key issue for Westminster is the high pressure for development and reconciling our economic and other objectives, including challenging targets for commercial growth and housing delivery, with the conservation and enhancement of the historic environment.
- 5.16 In this context, a central theme in the draft New London Plan is the importance of planning not just for growth but for 'Good Growth' which will contribute to sustainable development. The draft New London Plan policy is underpinned by principles of 'good growth' including - *Making the Best Use of Land*. This makes clear that *London's heritage holds local and strategic significance for the city and for Londoners and will be conserved and enhanced. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, should be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places*²⁴.
- 5.17 The West End Good Growth Study has also adopted this terminology, translating this to a Westminster specific definition of good growth for the West End, a key area where much of our commercial growth is anticipated. This study notes that part of

²⁴ [New London Plan](#) (with minor suggested changes) Making the Best Use of Land, Paragraph 1.2.7

Good Growth will involve maintaining historic buildings and the unique character of the area to retain the attractiveness of the West End for visitors and business.²⁵

- 5.18 Heritage should therefore be recognised as integral to achieving good growth. The NPPF makes clear that conservation is a dynamic process which seeks to manage change, accommodating modern needs in a way which also protects significance and encouraging enhancement to allow the historic environment to continue to be used and appreciated. Protecting and managing heritage need not therefore prevent the city from growing and developing.
- 5.19 To ensure such growth can be sustainably achieved, it is vital that wider policy on design and alterations and extensions integrates heritage considerations. It should make clear the importance of seeking appropriate and sensitive design solutions for new development in and adjacent to historic areas and target most significant growth to the most appropriate and sustainable locations. Key evidence which will help achieve this is set out in the Westminster's Building Heights Study²⁶ commissioned to inform the approach to growth and direct larger buildings to locations where they can be accommodated without harm to the historic environment. It is intended the approach to key development sites will be developed further in a Site Allocations Development Plan Document, as part of which heritage impacts will be fully assessed. Further views analysis and building height modelling around the World Heritage Site is being developed and will inform the World Heritage Site Management Plan and the approach to significant growth within the vicinity of the site.
- 5.20 The City Plan policy should also continue to ensure development proposals address how the historic environment adds to sense of place, as well as the importance of setting and managing a positive relationship with the historic environment and heritage assets through scale, design, materials and detail, so that good growth is based on an understanding of each areas character and can be delivered in a way which recognises and respects local distinctiveness. This issue should be considered across the plan, embedding heritage considerations in other policies which relate to the city's growth.

Policy Challenge – Improving the environmental performance of Historic Buildings while retaining their significance.

- 5.21 The challenges associated with addressing climate change are increasingly high on both central government and the council's agendas and historic buildings have a role to play in meeting these challenges. This has led to increasing pressure for upgrading and changes to the historic environment to increase energy efficiency and adapt to and mitigate the impacts of climate change. It is vital such changes are proactively and positively managed and consistent with the aims of heritage protection.
- 5.22 In Westminster, this is a particularly significant issue. A large proportion of our carbon emissions are produced by existing buildings. With only 1-1.5% of

²⁵ https://www.london.gov.uk/sites/default/files/20181129_gla_wcc_wegg_arup_final_report_released.pdf

²⁶ Urban initiatives [Westminster Building Height Study 2019](#)

Westminster's buildings being replaced annually, it is estimated that in 2050 some 70% of existing buildings will still be in use, with 40% dating from before 1985 (when the Building Regulations Part L was first introduced). The percentage of housing units within historic buildings is even greater, with 75% of Westminster's housing constructed prior to 1915 and 50% prior to 1870. A significant proportion of this existing building stock is protected by heritage designations.

- 5.23 Recent years have seen increasing numbers of applications for retrofit measures. Pressure to more positively consider retrofit of historic buildings has come from landowners and occupiers seeking to reduce energy costs and their carbon footprint and be responsible stewards of their properties, ensuring that they are fit for purpose and remain in active use. Large landowners in Westminster such as the great estates cover areas either wholly or largely within conservation areas, with a very high proportion of listed buildings and have led the way with programmes to sensitively retrofit their properties, including initiatives such as the Better Buildings partnership and Grosvenor's ['Sustainable Refurbishment: a Toolkit for Going Green'](#) (2016) which includes case studies in historic properties in Mayfair and Belgravia.
- 5.24 In addition, while listed buildings, buildings in conservation areas and scheduled monuments are exempt from full compliance with the energy efficiency requirements of Part L of the Building Regulations, a number of government initiatives have increased pressure on landlords to undertake building upgrades, including to historic buildings. This includes the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 and the accompanying guidance 'The Private Rented Property minimum standard' (2017, as updated), which came into effect in April 2018 and the Fitness for Human Habitation Act 2018. We therefore anticipate further applications to ensure properties are properly ventilated, heated and do not suffer from damp²⁷. We wish to ensure we can support such measures to improve local residents' living conditions but also ensure that they are undertaken sensitively. For the council, as a landlord of 12,000 council homes, this is a key issue, and a significant number of our own properties are listed.
- 5.25 Adopted City Plan policy has since 2010 included specific policy as part of the City Plan Heritage Policy that Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible. Given the continuing pressure for upgrading and changes to the historic environment, emerging policy should therefore continue to reference retrofitting of sustainable design measures and energy efficient improvements affecting historic buildings and areas. Historic England and other stakeholders have expressed concern that such policy could lead to specific encouragement of applications for energy efficiency measures which may not be necessary or well considered but could lead to an expectation that any such proposal would be looked upon favourably. To respond to this, policy needs to make clear that our historic building stock is particularly sensitive to the impact of certain retrofitting measures and

²⁷ The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015; The Private Rented Property minimum standard (2017, as updated); and the Fitness for Human Habitation Act 2018.

tailored solutions must be adopted in historic buildings which conserve their significance and do not increase the risk of long-term deterioration.

- 5.26 Further, as part of this, it should be clear in policy that historic buildings are in themselves a finite resource and, as noted previously, their inherent embodied energy means their care and conservation is part of the wider sustainability agenda and the ambition of reducing carbon emissions. Retrofitting existing buildings is a wider issue which should also be considered in other policy, but heritage policy should recognise that some change can be harmful, and all change should be based on a sound understanding of the character and importance of the historic asset involved. A different approach is required to minimise harmful effects on historic buildings and retain or enhance their significance.
- 5.27 In addition to the impact on aesthetic and historic significance of heritage assets it is important to note that traditional building construction and materials perform differently to modern construction. Pre-1919 buildings of traditional construction usually have solid masonry walls that allow the absorption and evaporation of moisture and they need to breathe to perform effectively. This can conflict with modern materials and methods and lead to unintended consequences such as increased damp, overheating etc which can also have long term harmful impacts on buildings fabric leading to structural damage.
- 5.28 Less intrusive measures should therefore always be considered first, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and lighting systems and use of green energy sources. High quality design and siting can play an important role in minimising any adverse visual effects of projects for example renewable energy technologies.
- 5.29 To assist in enabling residents and occupiers to sensitively retrofit historic buildings, the council has produced detailed guidance in [Retrofitting Historic Buildings for Sustainability](#) (2013). This remains relevant and consistent with Historic England Best Practice Guidance. Our forthcoming Heritage Supplementary Planning Document will provide further detail on this, and policy should also reference Historic England Guidance (list and links at Appendix 3).
- 5.30 Given the number of heritage assets and the large percentage of traditionally constructed buildings in Westminster, the need to adapt to and mitigate impacts of climate change, and initiatives from central government which means stakeholders wish to upgrade their building stock, it is considered appropriate that policy seeks to positively manage these changes and to acknowledge retrofit measures can be achieved that which will protect significance of heritage assets.
- 5.31 The Plan should recognise the contribution of existing buildings including historic buildings as an integral part of the wider environmental and sustainability agenda. It should take a positive approach to retrofit but recognise that different and tailored solutions will be required for historic buildings and that traditional buildings perform differently and poorly considered retrofit measures can lead to long term damage and deterioration of building fabric, as well as poor internal living conditions.

Policy Opportunity – A positive strategy for the historic built environment: Celebrating, promoting and better communicating the value of Westminster's Heritage.

5.32 Some of the challenges faced in protecting the historic built environment relate to lack of understanding or value placed on our heritage assets. The plan provides an opportunity through policy to seek to celebrate and promote Westminster's heritage and encourage development where it will promote greater understanding and awareness of heritage, both through enhanced interpretation which will communicate heritage values and through schemes which promote public access to and awareness of Westminster's historic environment.

Key issues identified from above challenges/ opportunities to be addressed in policy:

- 1) Policy should continue to allow for sympathetic changes of use to heritage assets, where appropriate based on a clear understanding of significance.
- 2) Updating of SPDs and guidance will be important to ensure residents and applicants have access to up to date and sufficiently detailed advice on the protection and care of historic buildings.
- 3) Policy must address the monitoring mission recommendations in relation to Westminster World Heritage Site and include policy with a clear and central focus on the OUV. It should also include a commitment to enhance understanding of OUV and work with stakeholders to improve the management of the site.
- 4) Evidence shows increasing pressure for upgrades to historic buildings to increase energy efficiency and mitigate/ adapt to climate change. Policy should seek to ensure that, where such work affects historic buildings, tailored solutions are sought, which are consistent with the aims of heritage protection.
- 5) Policy should recognise non-designated heritage assets can be significant, setting out what is likely to be considered a non-designated heritage asset but also make clear that a proportionate approach to their protection will be taken.
- 6) Policy needs to more clearly articulate that heritage protection does not preclude change and development and is part of good growth. Larger scale development should be targeted to the most appropriate locations where it will avoid and minimise harm to heritage assets and their settings.
- 7) Policy should recognise the contribution of existing buildings, including historic buildings as an integral part of the wider environmental and sustainability agenda but clearly signpost the need for different and tailored solutions for retrofit where this involves historic buildings.
- 8) Policy should promote enhanced awareness access to and interpretation of the historic environment.

6. Towards City Plan 2040

- 6.1 Development of new policy has been undertaken in several phases. A single, overarching strategic heritage policy was introduced into the adopted City Plan in 2013, with the intention that further detail be added in relation to each type of heritage asset when detailed policy in the UDP is replaced. There have been various iterations of detailed policy since this time. Existing adopted policies have been appraised at each stage of the process to ensure the substance of UDP policy is retained within emerging policy, where appropriate.
- 6.2 The informal draft of the City Plan 2040 changed approach from earlier consultation drafts and sought to simplify the overall policy framework to create a more accessible and user-friendly document. Previously drafted policies in relation to each type of heritage asset have been distilled into a single heritage policy, with subsections providing specific guidance on how each type of heritage asset will be protected in a manner appropriate to their significance.
- 6.3 Following informal consultation, several objections were received, expressing concerns that: policies and terminology are inconsistent with legislation; the plan lacks a positive heritage strategy; heritage is under represented - the single heritage policy is too high level and not sufficiently locally distinctive and policies are not supported by evidence.
- 6.4 In light of this, further analysis of existing policy has been undertaken and options considered to address concerns and ensure policy is sound and complies with our statutory duties in relation to heritage assets. As consultees requested that existing policy be reviewed, a table showing the existing adopted heritage policy wording and setting out where it is considered existing wording should be retained, amended or is not needed is set out below at Appendix 1. This paper has also been prepared to ensure relevant policy, problems and issues are considered, documented and addressed.
- 6.5 A number of key messages and issues have been drawn from the policy and regulatory review, collation of evidence and priorities identified in this paper.
1. As set out above in Section 4, Westminster's historic environment is exceptional and of fundamental importance to Westminster's character, economy and quality of life. It is an integral part of 'Good Growth' and an asset highly valued by our local communities, which also draws people from around the world. The exceptional quality, interest and value of Westminster's Historic Environment must be more positively addressed and celebrated in policy throughout the plan, and a positive message in relation to heritage should stress the positive role heritage plays in the city's character and development.
 2. The quality and extent of the historic environment in Westminster, as evidenced in Section 4, means this is a significant issue in Westminster. To ensure effective decision-making, we therefore require a sufficiently comprehensive and robust policy framework which will set out how we will apply strategic policy to different types of heritage assets, ensuring effective decision-making, based on an understanding of what makes our heritage asset's significant. Informal draft policy

is too generic and high level and some further detail is needed, in particular having regards to the policies, evidence and issues set out above.

3. The Local Plan will need to continue to support national legislation and policy protecting heritage assets. The review of requirements of legislation and guidance has suggested the need for some language within the informal draft policy to be changed to more precisely to reflect both statutory duties and requirements of the NPPF. However, revisions should cross reference and avoid repeating large sections of NPPF text, for example, tests in relation to harm and substantial harm.
4. Key issues and sources of evidence for Westminster have been identified. While it is appropriate and helpful to have a degree of generic guidance on heritage, further Westminster-specific references are needed, stressing Westminster's local distinctiveness, particularly within the supporting text.

- 6.6 To ensure a sufficiently comprehensive policy, one suggestion in comments received was that stand-alone policies for each type of heritage asset (listed buildings, conservation areas etc), may be more appropriate, rather than a single policy. It is accepted there is a need to significantly strengthen and add to the heritage policy in the informal draft, but it is considered that concerns can be addressed by introducing greater detail within this single policy, including new policy criteria and adding content to the supporting text and importantly, throughout the wider plan. In addition to an updated Heritage SPD, this should provide a comprehensive policy framework.
- 6.7 Revised policy should also identify and address any weaknesses within existing policy, and seek to address the challenges faced, as set out in Section 5 above. This means creating more positively worded policy which seeks to more strongly promote the role of heritage within Westminster's continuing growth and development, introducing criteria in relation to alterations to listed buildings into policy and making sure that the Outstanding Universal Value of the World Heritage Site is the critical guiding principle when considering development affecting the site and its setting.

Conclusion

- 6.8 As set out above, this paper was prepared to identify key issues to be considered in amending the plan and, in particular, areas where steps can be taken to strengthen draft Heritage policy in the informal plan. As a result of this, significant changes have been made to this policy and supporting text. It is considered this enhanced and more comprehensive policy, along with the production of the forthcoming Heritage SPD, will allow us to both fulfil our statutory duties in relation to heritage assets and, at the same time, ensure we have a positive strategy for proactive management of heritage which will allow us to strike the right balance, protecting our cherished heritage, while fulfilling our growth ambitions, in line with national policy of achieving sustainable development.
- 6.8 While this paper has primarily been prepared in response to concerns raised at informal consultation stage in relation to the specific heritage policy, key sources of information to inform other policies have been identified and changes made throughout the plan to address wider issues and ensure these policies do not conflict with the aims of heritage protection and, although these are not all considered in this

paper, all comments received as part of consultation have been considered in revising draft policy, to ensure the right balance is achieved. The issue of local views, also raised through consultation, is addressed in a separate short paper.

7. Addendum– October 2019

- 7.1 This paper and the policies and evidence referred to within it have been used to inform policy development and changes to the Westminster City Plan 2040 throughout its drafting and was published alongside the Regulation 19 Publication draft of the plan. This addendum sets out any changes since the topic paper was published and summarises why we consider Policy 40 (Heritage) as now drafted provides an effective and justified approach to the conservation of Westminster's heritage.
- 7.2 Since the preparation of the paper, there have been no significant policy changes which would necessitate modification of the content of heritage policy. The National Design Guide was published in October 2019²⁸. This emphasises the importance of valuing heritage, local history and culture where new developments are proposed, and draft City Plan Policy 40 is consistent with this guidance. In drafting the heritage policy, we also had regard to the requirements of both the adopted and emerging New London Plan. Since the initial drafting of the heritage paper, the Inspector's report for the New London Plan has been published and supports the approach to heritage set out within the emerging London plan and minor modifications proposed to this. The City Plan heritage policy is consistent with policy in the draft London Plan as set out in the original topic paper and does not therefore require further amendment. The Communities secretary also launched a campaign to promote local listing of buildings²⁹. However, the policy on non-designated heritage assets is considered to provide sufficient detail on this issue and would allow for a future local list. It notes the need for consistent criteria for identification of locally listed buildings which will be considered as part of the forthcoming Heritage SPD.
- 7.3 Regulation 19 consultation on the draft plan took place between 19th June and 31st July 2019. 16 responses were received which provided specific comment on policy 40. There was broad support for the policy and changes which have been made since informal consultation. Key issues raised were:
- Westminster World Heritage Site – need for further strengthening of policy;
 - Various minor wording issues;
 - Concern policy is too detailed, may conflict with the growth ambitions of the plan and does not fully engage with the issues of harm and benefit.
- 7.5 Historic England suggested a number of detailed further changes to strengthen and improve the effectiveness of the policy (see [consultation statement](#) for more detail) and minor modifications have been made to address these and issues raised by other stakeholders. The World Heritage Site section of the policy (clauses C – F) has been further strengthened and additional wording added in relation to historic parks and gardens, façade retention and good growth. The majority of issues raised,

²⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

²⁹ <https://www.gov.uk/government/news/communities-secretary-launches-most-ambitious-heritage-preservation-campaign-for-40-years>

however, are not considered to necessitate further modifications and the policy is considered appropriate, for the reasons set out below.

- 7.6 All key policy documents and a wide range of sources of evidence were considered in drafting heritage policy. In response to these, Policy 40 (Heritage) aims to conserve heritage assets in a manner appropriate to their significance. In doing so, it differentiates between designated and non-designated heritage assets and provides criteria for different types of heritage asset, taking into account their degree of significance and relevant statutory duties, including the requirement to have special regard to preserving listed buildings and preserving or enhancing the character or appearance of conservation areas. It recognises the World Heritage Site as being of the highest level of significance and has sought to address the recommendations set out by the ICOMOS/ ICCROM Reactive Monitoring Mission Report (listed at Appendix 4).
- 7.7 In line with the NPPF and adopted and emerging London Plans the draft policy also recognises the wider positive role of the historic environment in good growth and seeks design of the highest design quality, which will sustain and enhance their significance. It recognises the need to balance harm against public benefits and refers to the relevant tests in the NPPF without duplicating them. As such, we consider it provides an appropriate framework for the positive management of change in the historic built environment, encouraging both proposals which can accommodate modern needs in a way which also protects significance and new development which takes opportunities to draw on the contribution made by the historic environment to Westminster's character.
- 7.8 Given the extent of designated heritage assets and exceptional significance of Westminster's Historic Environment, this is a key issue for Westminster and a sufficiently detailed policy on heritage is required. We consider that Policy 40 sets out an appropriate and positive approach to the conservation of Westminster heritage assets which is effective, justified and consistent with national policy. We also recognise that while the heritage policy sets out the detail of our approach to heritage assets, heritage is an issue of importance for the plan as a whole. We have added significant references throughout the plan to recognise the positive role of heritage assets as part of Westminster's sustainable growth and development. The approach to other issues including how these have incorporated heritage considerations is also considered in other topic papers including those related to Building Height, Environment and Housing.

Appendix 1: Analysis of adopted policy wording and need for changes

Adopted Westminster City Plan (2016) Policy	Commentary
<p>Policy S25 Recognising Westminster's wider historic environment, its extensive heritage assets will be conserved, including its listed buildings, conservation areas, Westminster's World Heritage Site, its historic parks including five Royal Parks, squares, gardens and other open spaces, their settings, and its archaeological heritage.</p> <p>Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible.</p>	<p>Adopted strategic policy aims are still relevant and consistent with national policy but amendment to further emphasise NPPF requirements for positive strategy would be helpful, considering public participation and enjoyment of heritage and the wider benefits of the historic environment. This also needs to be reflected throughout the plan. Informal draft plan was very generic and some more locally specific information should be taken forward into amended draft.</p> <p>Existing adopted policy does not differentiate between designated and non-designated heritage assets and new point in draft policy in relation to non-designated heritage assets which will be further refined. Issue also considered further in main paper.</p> <p>Existing adopted policy includes aims to support higher environmental standards and improve access to historic buildings. These are considered appropriate objectives, but concerns have been expressed in relation to this issue and detail to be added to supporting text rather than policy to make clear the need for this to be sensitive and provide clarity on what this means in relation to heritage assets and wording not in policy itself. Evidence in relation to this issue set out in background paper (see paras 5.21-5.31).</p>
Adopted Saved Unitary Development Plan (2007) Policy	Commentary
<p>DES9 (Conservation Areas)</p> <p>(A) Applications for outline planning permission in conservation areas in the case of outline planning applications within designated conservation areas it may be necessary to require additional details to be produced in order that the physical impact of the proposed development may be fully assessed.</p> <p>(B) Planning applications involving demolition in conservation areas</p> <p>1) Buildings identified as of local architectural, historical or topographical interest in adopted conservation area audits will enjoy a general presumption against demolition.</p> <p>2) Development proposals within conservation areas, involving the demolition of unlisted buildings, may be permitted</p> <p>a) If the building makes either a negative or insignificant contribution to the character or appearance of the area, and/or</p> <p>b) If the design quality of the proposed development is considered to result in an enhancement of the</p>	<p>Overall, adopted policy is effective and it is important to retain the substance of this policy and ensure our conservation areas continue to be protected from inappropriate development and seek their enhancement wherever possible. However, some of detail in adopted policy relating to information requirements etc. is less useful and policy needs updating to be consistent with NPPF etc. Points from existing policy and which should be taken forward are considered below.</p> <p>While it is important to have sufficient information to determine applications, Part A, set out elsewhere in our validations list which is subject to more regular updates and this info therefore not specifically needed. Outline applications referenced in supporting text of new draft policy and this is sufficient.</p> <p>Part B of UDP policy relates to demolition and given NPPF, wording requires updating and has been amended to reflect this. Part C of the policy now covered largely by townscape and architecture policy but references to important features within</p>

conservation area's overall character or appearance, having regard to issues of economic viability, including the viability of retaining and repairing the existing building

3) In any such case, there should also be firm and appropriately detailed proposals for the future viable redevelopment of the application site that have been approved and their implementation assured by planning condition or agreement.

(C) Planning application for alteration or extension of unlisted buildings. Planning permission will be granted for proposals which

1) Serve to reinstate missing traditional features, such as doors, windows, shopfronts, front porches and other decorative features

2) Use traditional and, where appropriate, reclaimed or recycled building materials

3) Use prevalent facing, roofing and paving materials, having regard to the content of relevant conservation area audits or other adopted supplementary guidance

4) In locally appropriate situations, use modern or other atypical facing materials or detailing or innovative forms of building design and construction

(D) Conservation area audits

The existence, character and contribution to the local scene of buildings or features of architectural, historical or topographical interest, recognised as such in supplementary planning guidance, such as conservation area audits, will be of relevance to the application of policies DES 4 to DES 7, and DES 10.

(E) Changes of use within conservation areas

Permission will only be granted for development, involving a material change of use, which would serve either to preserve or enhance the character and appearance of the conservation area, bearing in mind the detailed viability of the development.

(F) Setting of conservation areas

Development will not be permitted which, although not wholly or partly located within a designated conservation area, might nevertheless have a visibly adverse effect upon the area's recognised special character or appearance, including intrusiveness with respect to any recognised and recorded familiar local views into, out of, within or across the area.

(G) Restrictions on permitted development in conservation areas

1) In order to give additional protection to the character and appearance of conservation areas, directions may be made under article 4(2) of the Town and Country Planning (General Permitted Development) Order 1995. Types of generally permitted development to which such directions may apply will include:

a) painting, cladding or rendering of building facades

b) insertion or replacement of doors and windows

c) removal or replacement of boundary walls and fences

d) alteration of roof profiles and replacement of roofing materials.

2) Such added powers of planning control may be applied to designated conservation areas the subject

conservation area included within amended policy.

Part C conservation area audits, a reference has been included to these in supporting text and further detail in policy itself is not considered necessary.

Point D on use was not covered in informal draft and uses within conservation areas to be included within policy. Important to retain references to setting within the emerging policy. Local views to be re-added within plan (in townscape and architecture policy) but considered in separate paper.

Point G of UDP policy is now out of date covered by legislation and not necessary to include in policy itself.

<p>of adopted conservation area audits or to buildings or groups of buildings therein identified as being of architectural, historical or topographical interest. 3) The existence of such directions will be taken into account in the authorisation of development that may itself be made subject to the removal of permitted development rights, in appropriate individual cases.</p>	
<p>DES 10: LISTED BUILDINGS (A) Applications for planning permission Applications for development involving the extension or alteration of listed buildings will where relevant need to include full details of means of access, siting, design and external appearance of the proposed development in order to demonstrate that it would respect the listed building's character and appearance and serve to preserve, restore or complement its features of special architectural or historic interest. (B) Demolition of listed buildings 1) Development involving the total demolition of a listed building (or any building listed by virtue of being within its curtilage) will only be permitted if, where relevant, the following criteria are met: a) it is not possible to continue to use the listed building for its existing, previous or original purpose or function, and b) every effort has been made to continue the present use or to find another economically viable use and obtain planning permission, with or without physical alteration, and c) the historic character or appearance of the main building would be restored or improved by the demolition of curtilage building(s), or d) substantial benefits to the community would derive from the nature, form and function of the proposed development, and (in all cases) e) demolition would not result in the creation of a long-term cleared site to the detriment of adjacent listed buildings 2) If development is authorised in conformity with any of the above criteria, it may be made subject to a condition, agreement or undertaking that any consequential demolition shall not be carried out until all the relevant details of the proposed development have been approved and a contract has been entered into for its subsequent execution. (C) Changes of use of listed buildings Development involving the change of use of a listed building (and any works of alteration associated with it, including external illumination) may be permitted where it would contribute economically towards the restoration, retention or maintenance of the listed building (or group of buildings) without such development adversely affecting the special architectural or historic interest of the building (or its setting) or its spatial or structural integrity. (D) Setting of listed buildings Planning permission will not be granted where it would adversely affect: a) the immediate or wider setting of a listed building, or</p>	<p>Given the large number of listed buildings in Westminster, important that a sufficiently detailed policy on listed buildings is maintained. Conservation officers identified supporting text to adopted policy is particularly useful and where possible information from this is carried over or will be included within SPD where too detailed.</p> <p>In terms of policy, Part A of adopted policy is focused on providing sufficient information and detail of proposals and could focus more on alterations and extensions. HE comments suggest new point needed on alterations and extension to listed buildings in addition to guidance in townscape and architecture policy and this will be inserted in next draft.</p> <p>As with conservation areas, while detailed info with applications is particularly important for listed buildings, this is also covered by validation lists, SPG and national guidance. The policy will, however, make reference to the need for sufficient and proportionate information to determine applications wherever a heritage asset is affected.</p> <p>Part B on demolition needs updated to refer to the NPPF and a shorter reference deferring to the NPPF is considered appropriate.</p> <p>Part D is wording on settings is useful so will be retained in policy going forward.</p> <p>E in relation to architectural theft is considered sufficient to reference in supporting text as issue for applicants to consider with any more detail in SPD.</p>

<p>b) recognised and recorded views of a listed building or a group of listed buildings, or c) the spatial integrity or historic unity of the curtilage of a listed building. (E) Theft or removal of architectural items of interest in order to reduce the risk of theft or removal of architectural items of interest or value from historic buildings during the course of development, the City Council may require additional security arrangements to be made while buildings are empty or during the course of building works.</p>	
<p>POLICY DES 11: (A) Scheduled Ancient Monuments Permission for proposals affecting the following Scheduled Ancient Monuments, or their settings, will be granted providing that their archaeological value and interest is preserved: 1) the Chapter House and Pyx Chamber in the Cloisters, Westminster Abbey 2) the Jewel Tower. (B) Areas and Sites of Special Archaeological Priority and Potential Permission will be granted for developments where, in order of priority: 1) all archaeological remains of national importance are preserved in situ 2) remains of local archaeological value are properly evaluated and, where practicable, preserved in situ 3) if the preservation of archaeological remains in situ is inappropriate, provision is made for full investigation, recording and an appropriate level of publication by a reputable investigating body.</p>	<p>Change to reflect new Scheduled Ancient Monument and GLAAS updated priority areas. Informal draft did not name SAMs in policy itself, proposed to reinsert to make more specific to Westminster, also to reinsert point on retaining architectural deposits in situ as in existing policy</p>
<p>POLICY DES 16: WORLD HERITAGE SITE Permission will only be granted for developments that protect and conserve the character, appearance, setting and ecological value of the World Heritage Site</p>	<p>Existing adopted UDP has no reference to Outstanding Universal Value. There is need to expand draft policy to have much stronger focus on OUV and to maintain a strong presumption against development that would result in harm to the of the World Heritage Site, its authenticity or integrity. Issue to be considered further in main paper.</p>
<p>POLICY DES 12: PARKS, GARDENS AND SQUARES (A) Development adjacent to open spaces Permission will only be granted for proposals adjacent to parks, public and private squares which: 1) safeguard their appearance, wider setting and ecological value 2) preserve their historic integrity 3) protect views into and out of these spaces 4) will not project above existing tree or building lines. (B) Development on or under open spaces Permission will not be given for development on or under those parks, landscaped spaces and public or private gardens, where the open spaces: 1) form an important element in the townscape, part of a planned estate or street layout 2) are characteristic features of conservation areas 3) provide the setting of a listed building 4) are of significant ecological value.</p>	<p>Adopted policy covers range of issues but no specific policy on historic parks and gardens in UDP, new plan introduced specific policy subsection in heritage policy to recognise particular requirements where parks and gardens are heritage assets, but issues split between this and green infrastructure. Other issues in relation to development on open space remain important but are in green infrastructure policy. Views covered within the Townscape and Architecture policy but also referenced in Heritage policy. Policy should ensure all issues from within this policy are covered within new policy.</p>

Appendix 2: Review of Key Policies and Guidance for Heritage and Plan Making

International Conventions and Charters

UNESCO World Heritage Convention (1972)

The European Convention on the Protection of Archaeological Heritage (1992)

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

Allows for buildings, structures and conservation areas to be designated. Sections 16(2) and 66(1) of the 1990 Act requires that special regard be given “to the desirability of preserving the building or its setting or any features of special architectural historic interest which it possesses” in planning or listed building decision making. Section 72(1) of the 1990 Act makes similar provisions for preserving or enhancing the character or appearance of conservation areas. Section 69 (Designation of conservation areas) provides the legislation that allows local planning authorities to designate conservation areas and requires that the authority reviews the areas designated.

Ancient Monuments and Archaeological Areas Act 1979

This Act legislates to protect the archaeological heritage of Great Britain. The Act defines monuments which warrant protection and establishes that damage to these amounts to a criminal offence.

National Policy and Guidance

National Planning Policy Framework (NPPF): February 2019

This sets out the Government's planning policies for England, specific references to heritage as follows:

Chapter 3 Plan Making

Strategic policies

20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision¹² for:

d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

Chapter 12, Design. Para 127.

Planning policies and decisions should ensure that developments:

c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit*

Section 16 Conserving and enhancing the historic environment (paras 184-202) detail historic environment policies and provide fundamental policy guidance for informing plan-preparation and decision making.

Chapter 16, para 185 Local plans should set out a *positive strategy for the conservation and enjoyment of the historic environment, including heritage assets*

most at risk. This strategy should take into account: a) *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
b) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
d) *opportunities to draw on the contribution made by the historic environment to the character of a place.*

NPPF para 187 What evidence might be needed to plan for the conservation and enhancement of the Historic environment?

Planning policies should be based on up-to-date evidence about the historic environment in their area. Strategic policy-making authorities should use this evidence to assess the significance of heritage assets and the contribution they make to their environment and to predict the likelihood of currently unidentified heritage assets being discovered in the future. Authorities may draw on a wide range of evidence sources, including the relevant historic environment record, the National Heritage List for England, conservation area management plans and appraisals.

National Planning Practice Guidance

The NPPG explains key issues and answers common questions to guide implementation of national policies. Historic Environment section is of particular relevance. Key extracts are below:

In relation to Local Plans Paragraph: 004 Reference ID: 18a-004-20140306 In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. *Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.*

The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Local planning authorities should consider the relationship and impact of other policies on the delivery of the strategy for conservation.

In relation to non-designated heritage assets Paragraph: 006 Reference ID: 18a-006-20140306 (2014)

While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public.

In this context, the inclusion of information about non-designated assets in Local Plans can be helpful, as can the identification of areas of potential for the discovery of non-designated heritage assets with archaeological interest.

In relation to World Heritage Sites Paragraph: 032 Reference ID: 2a-032-20140306 (2014)
World Heritage Sites are designated heritage assets of the highest significance. Appropriate policies for the protection and sustainable use of World Heritage Sites, including enhancement where appropriate, should be included in relevant plans. These policies should take account of international and national requirements as well as specific local

circumstances. When developing Local Plan policies to protect and enhance World Heritage Sites and their Outstanding Universal Value, local planning authorities, should aim to satisfy the following principles:

- protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone
- protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site and its setting where appropriate and possible through positive management
- protecting the World Heritage Site from climate change but ensuring that mitigation and adaptation is not at the expense of integrity or authenticity

London Plan

Adopted London Plan Policy 7.8 Heritage assets and archaeology notes that:

F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic

Draft New London Plan (2017)

Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- *setting out a clear vision that recognises and embeds the role of heritage in place-making*
- *utilising the heritage significance of a site or area in the planning and design process*
- *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- *delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

Policy HC2 World Heritage Sites

A Boroughs with World Heritage Sites and those that are neighbours to authorities with World Heritage Sites should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management. B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

C Development Proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

D Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

Historic England Advice Notes

HE advises Government on heritage issues and has produced a number of guidance notes.

Good Practice Advice Note 1 [The Historic Environment in Local Plans: 1 \(July 2015\)](#)

Good Practice Advice Note 2 [Managing Significance in decision-taking](#)

Good Practice Advice Note 3 [The Setting of Heritage Assets \(Second Edition\) December 2017.](#)

HE Advice Note 1 [Conservation Area designation appraisal and management](#)

HE Advice Note 2 [HEAN 2: Making Changes to Heritage Assets](#)

HE Advice Note 3 [Historic Environment and Site Allocations in Local Plans](#)

HE Advice Note 7 [Local Heritage Listing](#)

Historic England. Conservation Principles, policies and guidance

<https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>

Six high-level guiding principles:

- The historic environment is a shared resource
- Everyone should be able to participate in sustaining the historic environment
- Understanding the significance of places is vital
- Significant places should be managed to sustain their values
- Decisions about change must be reasonable, transparent and consistent
- Documenting and learning from decisions is essential

Appendix 3: List of Evidence and other Useful references in relation to Westminster's Heritage Assets

Conservation Area Audits (various dates) Westminster City Council
<https://www.westminster.gov.uk/conservation-area-audits>

Historic England City of Westminster Archaeological Priority Areas Appraisal (March 2017)
<https://historicengland.org.uk/content/docs/planning/apa-city-of-westminster-pdf/>

Westminster World Heritage Site Statement of Outstanding Universal Value
<http://whc.unesco.org/en/list/426/>

Westminster World Heritage Site Management Plan (2007) Atkins
<https://www.westminster.gov.uk/world-heritage-site>

ICOMOS/ ICCROM Reactive Monitoring Mission Report (2017)
<https://whc.unesco.org/en/list/426/documents>

ICOMOS UK London Views Project
www.icomos-uk.org/committees/cultural-landscapes-and-historic-gardens-committee/

Mayor of London, London's World Heritage Sites – Guidance on Settings, March 2012
https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/World%20Heritage%20Sites%20SPG%20March%202012%20lowres_0.pdf

Royal Parks Management Plans
<https://www.royalparks.org.uk/managing-the-parks/park-management-plans>

Survey of London
<https://www.british-history.ac.uk/search/series/survey-london>
Volumes 10, 13, 14 ,16, 18, 20, 29, 20 , 31 ,32 , 33 , 34 , 35 , 36 , 38 , 39 , 40 , 45

Other conservation management plans and area-based studies
Palace of Westminster Conservation Plan
Paddington Station Conservation Plan

High Buildings Study (2000) EDAW Ltd/Buro Happold Urban Projects. Published by Westminster City Council. <https://www.westminster.gov.uk/environment-design-and-heritage>

Westminster Building Height Study Urban Initiatives (2019)
https://www.westminster.gov.uk/sites/default/files/city_plan_building_height_study.pdf

London View Management Framework
<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/london-view-management>

Draft Metropolitan Views SPD (2007) Westminster City Council
http://transact.westminster.gov.uk/docstores/publications_store/Metropolitan_views_Consultation_draft.pdf

London's Image and Identity Revisiting London's Cherished Views
<https://historicengland.org.uk/content/docs/get-involved/londons-image-and-identity-pdf/>

Cultural Infrastructure Plan for London

https://www.london.gov.uk/sites/default/files/cultural_infrastructure_plan_online.pdf

The Importance of the Historic Environment to the Office Market in Westminster

(2007) http://www3.westminster.gov.uk/docstores/publications_store/WCC%20Office%20Report%20-%20Jan%202008.pdf

HE Heritage Counts studies (various)

<https://historicengland.org.uk/research/heritage-counts/>

<https://historicengland.org.uk/content/heritage-counts/pub/2018/hc2018-heritage-in-commercial-use/>

<https://historicengland.org.uk/content/heritage-counts/pub/2018/heritage-and-society-2018-pdf/>

Good Growth in London's Historic Environment (2017)

<https://historicengland.org.uk/content/docs/get-involved/translating-good-growth-london-historic-environment-120717-pdf/>

Historic England Streets for all London

<https://historicengland.org.uk/images-books/publications/streets-for-all-london/heag149c-sfa-london/>

Wellbeing and the Historic Built Environment (2018)

<https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/>

Visit Britain Visitor Surveys <https://www.visitbritain.org/annual-survey-visits-visitor-attractions-latest-results>

Westminster Supplementary Planning Guidance and documents are also relevant, and include guidance on conservation areas, listed buildings, historic parks and gardens etc. A full list of topic-based SPG/d is on our website:

<https://www.westminster.gov.uk/topic-based-planning-guidance>

Historic England Technical Advice, relevant to retrofitting and access

<https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

<https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/windows-and-doors-in-historic-buildings/>

<https://historicengland.org.uk/advice/technical-advice/emergency-and-fire/fire-advice/>

<https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/>

<https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/>

<https://historicengland.org.uk/advice/technical-advice/easy-access-to-historic-buildings-and-landscapes/>

Appendix 4: Westminster World Heritage Site, Recommendations from the ICOMOS/ ICCROM Reactive Monitoring Mission Report (2017)

Recommendation 1: Awareness materials should be developed to provide all stakeholders in the process with more information about the World Heritage Convention, and in particular, the concept of Outstanding Universal Value. These materials should be widely distributed, and an emphasis should be given to the management and protection aspects of OUV.

Recommendation 2: Policy and guidance materials should be written in as concrete a manner as possible to reduce the possibility for interpretation in a way that is not consistent with the protection of OUV. Steps have been taken in recent years to do so, but the disconnect between the words within the policies and the results on the ground still remains large enough for concern.

Recommendation 3: The State Party should consider revising its planning and policy documents to ensure that the protection of OUV is given the maximum weight possible when balancing the harm to the heritage vs. the potential benefit. These policies should continue to emphasise sustainable development approaches to development at World Heritage properties and their settings. But, as a first principle, these developments should have as a centrepiece, a requirement for protection of OUV. This is a fundamental concept of the World Heritage Convention.

Recommendation 4: Properties recognized as World Heritage (whose preservation and safeguarding is subject of an international treaty signed at State Party level) should enjoy a special status in regard to decision-making at all levels. There is a need for a widening cooperation in the decision-making process, using synergetic capacities among the boroughs, supported by coordination at the level of the Greater London Authority. It should play a much larger role in determining consent when there is a potential for negative impact on the OUV of a property in accordance with the London plan and other policy and guidance documents at the city level.

Recommendation 5: The national government should consider calling in every planning application that has a potential to impact negatively on the OUV of a World Heritage property. In this regard, the advice of Historic England should be given a strong weight in determining when to call in an application. In this way, the obligations of the United Kingdom under the World Heritage Convention can be met more effectively than is currently the case.

Recommendation 6: Historic England should be given a stronger role at all levels to give advice on development projects. The organization already does play a significant role, but its advice is sometimes not given the necessary weight when difficult development decisions are taken.

Recommendation 7: Creative means should be explored with the World Heritage Centre and Advisory Bodies to minimize the impact of non-complimentary timeframes for commenting on and consenting to development proposals.

Recommendation 8: The new management plan for the World Heritage property, which is in preparation, should be finalized as soon as possible by the Westminster City Council, in cooperation with the other members of the Steering Group. This management plan should consider management and decision-making issues within the World Heritage property and its setting. It should also include disaster risk management at the property and in each of the buildings of the property. The plan should contain clear actions for its implementation taking

into account all members of the Steering Group and should assign responsibilities as well as indicators for implementation to allow for an evaluation of its implementation over time.

Recommendation 9: The Steering Group should be revitalized, with regular meetings and a more action oriented perspective in regard to overseeing the implementation of the Management Plan. The Greater London Authority should also take a more active role in the Steering Group (perhaps becoming a co-chair) to bridge differences amongst the boroughs.

Recommendation 10: It would be advisable and necessary to create an inventory of already issued building permission for tall buildings with indication of the level of their realization (not yet started, started, under construction, almost finished). At least in the context of the World Heritage property it would also be advisable to create a tool for possible amendment during realization (e.g. building stop at lowest level, having less floors as planned etc.).

Recommendation 11: The Mission Team does not recommend listing the property on the World Heritage List In Danger at this time, despite the negative impacts that developments such as Elizabeth House, Shell Centre, and Nine Elms, all three in construction, have on the OUV of the property. Nevertheless, the cumulative effect of these developments with other planned developments could lead the Committee in the future to consider In Danger listing

Recommendation 12: The State Party needs to use a more robust method of carrying out Heritage Impact Assessments on any developments, which may have an impact on the OUV of the property. These HIA need to have the strong input and advice of Historic England and should become the basis for any decision-making for approval of development projects.

Recommendation 13: The 3D modelling system, that is currently in development, should continue to be refined and developed in a way that allows developers, planners, and decision makers to have a more dynamic system of view protections for the World Heritage property. In regard to views, the system of important views should be reviewed to take into account the possibilities of views at different levels and in “non-traditional” places.

Recommendation 14: The planning process should be revised to take into account the impact, not only of single development proposals, but also the cumulative effects of a number of projects either approved or in the planning stage. Tools such as 3D modelling should be used to more easily see these potential cumulative effects.

Recommendation 15: The advice of the national heritage advisor, Historic England, should be given a much greater weight by all of the boroughs and other levels of decision-making when evaluating projects and their potential impact on OUV. It is unlikely that if Historic England has an objection to a particular project, that the World Heritage Committee and its Advisory Bodies would have a lesser concern. An objection by Historic England should already be a warning sign to the whole chain of decision-making that there will likely be issues at the World Heritage level.

Recommendation 16: The phased approach to the closure of Abingdon Street, the demolition of the temporary education centre, and the development of an updated visitor management and interpretation strategy is welcomed. In conformity with paragraph 172 of the Operational Guidelines, the State Party should inform the World Heritage Centre as proposals are developed for any changes to the spaces adjacent to the Palace of Westminster, Westminster Abbey, Saint Margaret's Church, and Parliament Square that may affect the Outstanding Universal Value of the Property.

Recommendation 17: The Holocaust Foundation may wish to consider setting up a mechanism whereby the Jury of the design competition for the memorial is able to get advice

from the World Heritage Centre and/or Advisory Bodies before a final decision is taken. In any event, the selected design and related developments should be submitted to the World Heritage Centre, in conformity with Paragraph 172 of the Operational Guidelines.

Recommendation 18: The State Party may wish to reconsider the establishment of a buffer zone around the World Heritage property. While not able to deal with issues related to the larger setting, a buffer zone could be a useful tool to inform future development and design of any new elements in the vicinity of the World Heritage property.

Recommendation 19: As more detailed plans are developed for the Restoration and Renewal project for Westminster Palace, the State Party should keep the World Heritage Centre and Advisory Bodies informed as soon as possible, particularly in regard to demolitions or new constructions, but also to any other significant works that may impact on the OUV of the property. This early notice will avoid any misunderstandings as the work progresses.

Recommendation 20: The Restoration and Renewal project offers the Westminster team an opportunity to reconsider the temporary structures for entertaining along the riverside façade of the palace. Any eventual hospitality structures on that important view should take into account the visual impacts from the Lambeth side of the river and should in no way have a negative impact on OUV.

Recommendation 21: The mission team regrets that the work on the Triforium project was carried out without an HIA and without informing the World Heritage Centre prior to commencement of the project. While it does not appear that this addition will have a negative impact on the OUV of the property, it is recommended that any future work be subject to HIA and information being provided. In the meantime, the mission recommends that full information on the existing project be sent to the World Heritage Centre as well as a final report of the works once they have been completed to ensure that there has been no negative impact on the OUV.

Recommendation 22: The Greater London Authority should consider the creation of a “joint committee” or other coordinating structure, which would allow the four World Heritage properties in London to establish mechanisms for networking and cooperation in management and conservation. This process should be open to all boroughs who are involved in the management and conservation of these properties.

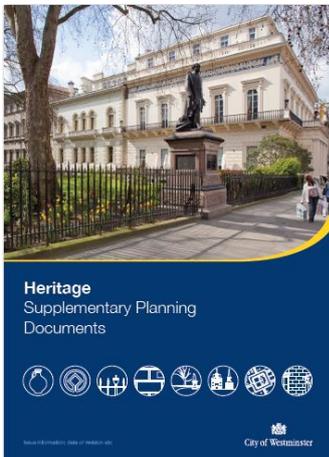
Recommendation 23: In a similar fashion, the national government should consider setting up a “joint committee” of all World Heritage properties in the United Kingdom to allow.

Appendix 5: Update of Heritage Topic SPG/Ds

Recognising the extent and value of Westminster's historic environment, detailed guidance on implementation of policy will be maintained and updated. Following adoption of the City Plan, the existing Heritage-related topic SPDs will be updated with the creation of an updated online Heritage SPD. This will replace the following adopted heritage-related SPGs:

- Repairs and Alterations to Listed Buildings;
- The Protection of Historic Buildings in Westminster;
- Architectural Theft;
- Development and Demolition in Conservation Areas;
- A Guide to Archaeology and Planning in Westminster;
- Historic Parks and Gardens;
- Retrofitting Historic Buildings for Sustainability.

Existing Heritage related SPG/D remain relevant and will be maintained on the website until this updated guidance has been prepared and consulted upon. A draft structure and outline have been prepared and it is proposed the SPD will comprise an overarching online Heritage SPD which sets the overall framework for Heritage policy and background with links to detailed SPD guidance on each of the topic areas, meaning these can be added as sub-sections within the overarching Heritage SPD as each is prepared and can be more easily updated. It is proposed text and content from existing SPGs can be retained wherever still relevant and useful. The exact scope and detail of this will be consulted upon.



Westminster's Heritage SPD

Setting out overarching policy in relation to Heritage, including policy framework, designated and non-designated heritage assets and overview of Westminster's history and characterisation linking to topics below.

1 Westminster World Heritage Site

relevant planning related guidance from within the management plan distilled into a short World Heritage Site SPD summarising attributes and key information.

2 Listed Buildings

incorporating existing text from within and updating Repairs and Alterations to Listed Buildings, Protection of Historic Buildings In Westminster and Architectural Theft .

3 Conservation Areas:

incorporating and updating text from Development and Demolition in Conservation Areas.

4 Historic Parks and Garden

incorporating text from and updating existing SPG.

5 Archaeology

more significant updates needed to existing guidance updated to include new APAs.

Existing more specific and technical guidance such as that relating to guides to stucco and railings remains relevant but will be reviewed to see whether updates are needed. It is expected this can be largely retained but reformatted to be accessible with the Heritage SPD and for easier web access. Retrofitting may also form part of this and any forthcoming environment SPG but should be accessible from the Heritage SPD site.

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