

CITY PLAN 2019 – 2040

VIEWS
BACKGROUND PAPER
JUNE 2019

Executive Summary

In preparation for Westminster City Plan 2019-2040, the council has engaged in a robust consultation with key stakeholders. As guardians of the city's iconic heritage and landmarks, policy has always set to protect and support our most distinctive and most valued assets. However, during the informal consultation in the latter part of 2018, concerns were raised regarding some aspects of the draft plan, including new draft policy on Views.

The primary criticism was that whilst there was strengthened focus on Strategic Views, policy surrounding Local Views had been omitted. Currently, the adopted plan recognises these two distinct types. A number of local residents' groups objected to the loss of reference to 'local views'. This was backed by Historic England who called for a more detailed and positive approach in protecting our historic environment, and see local views as playing an integral part in this. We have taken on board this feedback and will retain the category distinctions as per the current adopted plan. By doing so, we can protect what makes Westminster's neighbours both distinctive and special.

We do, however, have to recognise that some views are more strategically important than others, particularly the 'picture-postcard' views which makes our city an unparalleled global visitor destination. It is clear that a balanced approach in planning decisions is necessary. Some of those consulted also felt that the wording in adopted policies in relation to protecting views was too negative. Recognition of views does not always prohibit visual change, but rather can set an exciting challenge to contribute to Westminster's character. We have since amended policy wording to recognise that whilst some views are more important than others, a positive approach is needed to support growth in the city.

Stakeholder engagement has given us the opportunity to work together to improve policy. We have identified an updated list of Local and Metropolitan Views and following the Regulation 19 consultation, we shall consult upon this and a set of criteria for identifying new local views. We are confident that policy on Views within City Plan 2019-2040 will protect what makes Westminster so special for decades to come.

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1 Background

- 1.1 The recent informal consultation on Westminster's draft City Plan attracted a number of comments in relation to view protection, including objections to the omission of any reference to 'local' views within the plan. To address objections and inform amendments to policy, this paper provides some background to this policy area and proposed amendments to emerging policy and reasons for these changes.

2 Views in Westminster

- 2.1 Westminster's unique townscape gives rise to some of the most familiar and cherished views of London. These include views towards and from the River Thames and its frontages, views from the Royal Parks, as well as many other 'picture postcard' views of famous London landmarks.
- 2.2 **Strategic views**, identified in the London Plan, are those considered to define London's character and identity at a strategic level.
- 2.3 **Local views** are of other landmarks and spaces valued by local communities for their contribution to Westminster's distinctive character areas. Westminster's adopted policy recognises that some of these are more significant than others and includes two categories of local view - those of metropolitan (or city-wide) importance and other local views which are important within the context of local neighbourhoods.

3 Visual Impact Assessment and View Protection Policy Context

- 3.1 The importance of views to character and the historic environment and the role of views in assessing development is recognised in national, London and local policy.
- 3.2 **National policy** stresses the importance of understanding and assessing visual impacts of development on local character, noting that local plans should develop robust policies that set out the quality of development expected for the area *grounded in an understanding and evaluation of each area's defining characteristics*.¹
- 3.3 An understanding and appreciation of historic buildings and their settings is closely linked to views, for example landmark buildings are usually appreciated within views and in relation to their surroundings. The National Planning Policy Framework also identifies that the setting of heritage assets

¹ NPPF Chapter 12, paragraph 125

can contribute to their significance. Further, the settings of listed buildings are subject to statutory protection².

- 3.4 Historic England (HE) guidance supporting national policy further explains the role that views play in shaping appreciation and understanding of the historic environment. Specific advice on views and how they contribute to understanding England's historic environment is in *the Setting of Heritage Assets (2017)* and their guidance on conservation area designation and management³ notes the contribution of views to local character and townscape more generally - the latter document suggests local views should be identified within conservation area appraisals.
- 3.5 HE guidance on Local Plans notes that development management policies may be needed for decision takers to determine how they should react to an application affecting a heritage asset and that this could include policy *to protect or enhance important views and vistas*⁴.
- 3.6 They have also produced recent research focused on London's strategic views, recognising their contribution as: *a fundamental part of London's heritage.... which has.... helped to shape London's skyline by creating articulation and points of interest, contributing to the character and distinctiveness of the city.*⁵
- 3.7 The **London Plan** recognises the importance of views to the character of London as a whole. Both adopted and emerging plans include a list of strategic views identified by the Mayor including London Panoramas, River Prospects, Townscape Views and Linear Views (i.e. those focused on a particular landmark). Eighteen of the strategic views identified in the London Plan are from towards or across Westminster.
- 3.8 Several of these views include 'protected vistas' and have a geometrically defined viewing corridor⁶ subject to specific protection and height limits and supported by Directions issued by the Secretary of State. These are shown on the map at in Appendix 1. In addition, designated townscape views and river prospect views are focused on the Palace of Westminster and direct that its silhouette should not be altered and any development which appears behind it should be refused. These are listed at **Appendix 1**.
- 3.9 Both adopted and draft London Plan policies require designated views to be included within local plans. The informal draft city plan consulted on in November 2018, included a high-level policy on views, but did not include a list of all these views.

² Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990

³ Historic England Good Practice Advice Note 3 Setting 2017

⁴ Historic England Historic Environment in Local plans. Historic Environment Good Practice Advice Note 1

⁵ Historic England, London's Image and Identity - Revisiting London's Cherished Views, 2018

⁶ A protected vista is a specific geometrically defined area between an assessment point and a Strategically Important Landmark, as explained in the LVMF SPG

- 3.10 With regards to local views the adopted London Plan suggests that the principles of its Policy 7.12 be used for the assessment and management of local views. The emerging new London Plan in draft Policy HC3 also refers to local views and strengthens the approach, suggesting that boroughs designate local views and landmarks in recognition of their contribution to local character and sense of place noting that: *Clearly identifying important local views in Local Plans and strategies enables the effective management of development in and around the views*⁷.
- 3.11 **Westminster's Adopted Policy:** The adopted Westminster City Plan (2016) and the Unitary Development (2007) include policies to protect both strategic and local views from inappropriate development. S26 notes that *Strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development.* Policy DES 15 states that: *Permission will not be granted for developments which would have an adverse effect upon important views.*
- 3.12 As set out above, as many of Westminster's local views are of more than purely local significance adopted policy includes two categories of local views - 'Metropolitan' and Local. Metropolitan views are of Westminster's most significant landmarks and open spaces (see list at Appendix 2) and are therefore considered of city-wide importance. They are of some of the most significant landmarks in Westminster. Local views are by definition more localised. They are important within the context of local neighbourhoods and can be of locally important landmarks such as churches, parks and open spaces, views along or across the River and Westminster's canals, usually within conservation areas.
- 3.13 A draft list of metropolitan views has been prepared and is not adopted but is published and referred to by both applicants and officers. This is appended at **Appendix 2**. In line with the Historic England guidance on content of conservation area appraisals⁸, Westminster's conservation area audits identify local views and landmarks. Within the adopted Knightsbridge and other emerging Neighbourhood Plans, local communities have also identified locally important views within their areas. Westminster World Heritage Site Management Plan also includes important views of the World Heritage Site.

4 Views in Development Management Process

- 4.1 Visual Impact Assessments are a standard part of the Environmental Impact Assessment and Heritage Impact Assessment required for large scale and sensitive development. Views form the baseline for such analysis. Analysis then considers magnitude of effects of development within views and what

⁷ Draft London Plan Policy HC3, 2017

⁸ <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

measures can be taken to avoid, remedy or compensate for harm caused. This is important in assessment and understanding of the impacts of tall buildings and seeking measures to mitigate any harm caused.

5 Draft City Plan Policy

- 5.1 The informal draft of the City Plan included one policy which considers strategic views only. As set out above, this generated several consultation comments. Historic England have requested inclusion of criteria in relation to local views as part of developing a more detailed and positive strategy for protection of Westminster's historic environment. A number of Neighbourhood Forums and the St Johns Wood Society have objected to the loss of reference to local views. The London Parks and Gardens Trust and Royal Parks have also requested the inclusion of reference to views from Westminster's parks and ICOMOS UK have requested more detailed policy on the Westminster World Heritage Site. The City of London have requested we refer to protection of cross-borough local views.
- 5.2 In light of these comments, the policy area has been re-appraised, taking into account the key points from existing policy identified above and a number of changes are now proposed, as set out below.
- 5.3 The policy as drafted focused on strategic views, which are already covered in some detail in London Plan policy and it is considered revisions to City Plan policy should seek to make policy locally distinctive and clearly focused on Westminster. Policy is therefore to be re-titled Westminster views and a list of those particular strategic views affecting Westminster identified within the plan. The informal draft plan included a map and text which only refers to protected vistas and this will be amended.
- 5.4 It is also proposed that wording in relation to local views is included within the policy. As set out above, the Identification of local views is supported by national and local policy and guidance. Both adopted and draft London Plans suggest that boroughs include local views in Local Plans to enable the effective management of development in these views.
- 5.5 Having clarity on how we will identify a significant Westminster view and a set of views identified can help add certainty to the planning process, as well as ensuring that development proposals are properly assessed in relation to and will make a positive contribution to the character and distinctiveness of Westminster's townscape.
- 5.6 Further, neighbourhood forums can identify local views in neighbourhood plans, and many are doing so in their emerging plans. It will be important to maintain a clear policy in relation to local views to guide the treatment of local views within neighbourhood plans and ensure a consistent approach to their identification and management.

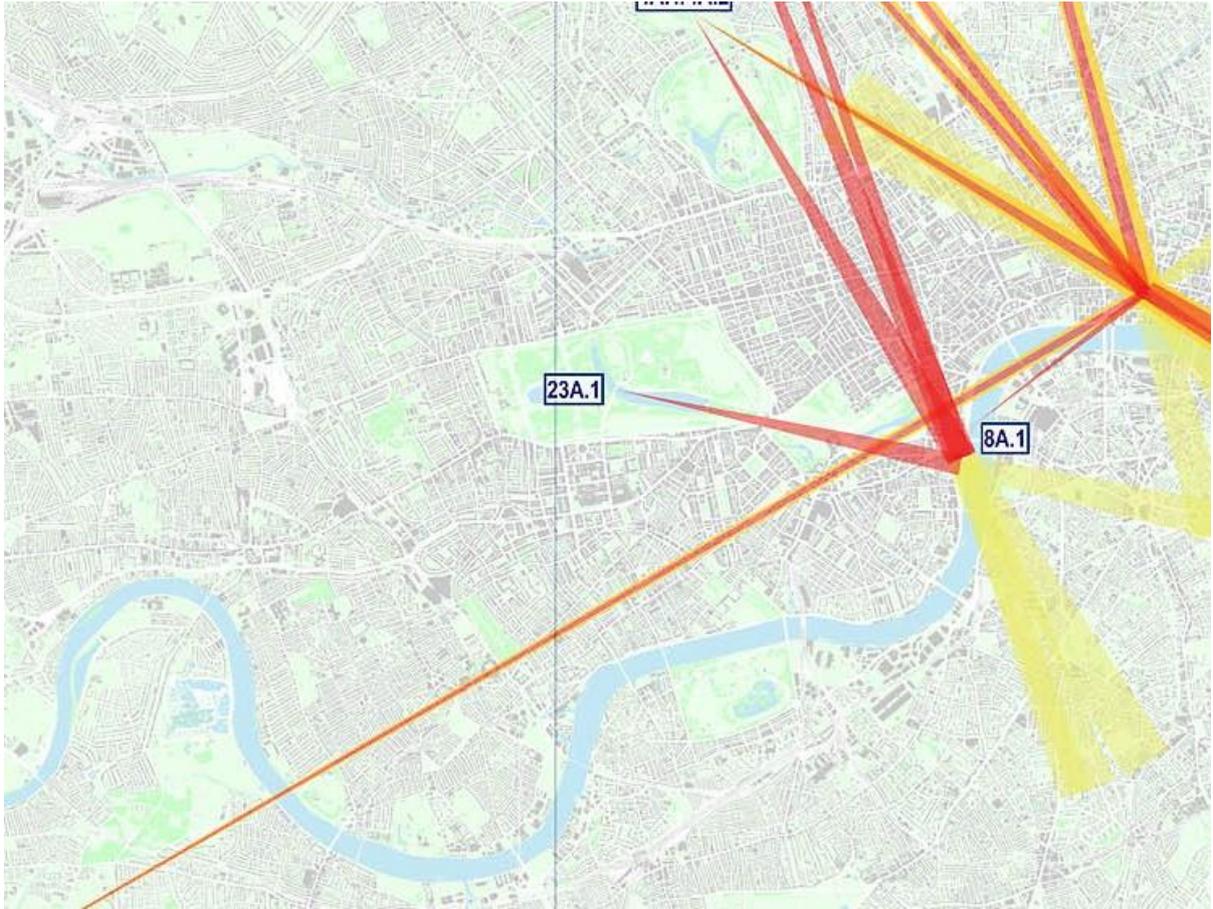
- 5.7 Recognising that views policy is sometimes perceived to be about allowing no visual change, it is proposed emerging policy should make clear that positive change to views is encouraged and the identification of views does not preclude visual change, except where there are absolute thresholds (i.e. Protected Vistas and Protected Silhouettes), which are set by the GLA.
- 5.8 Further, to ensure a proportionate approach to protection of views, it is recommended we retain differing categories of views, making clear that certain views are more significant and more sensitive to change than others and a proportionate approach will be taken when making planning decisions on change within these views, with greatest levels of protection afforded to most significant views.
- 5.9 To add further clarity, it is proposed we will consult on an updated list of the most significant views in the city (views of metropolitan or city-wide importance) following the Regulation 19 consultation on the City Plan. To ensure certainty and consistency of how other local views are identified (in Neighbourhood Plans, conservation area audits or other area based documents) it is proposed a set of criteria for identification of local views should be prepared.

Main recommendations and changes to views policy in the revised draft City Plan

- 1) Include a full list or map of strategic views which affect Westminster following draft London Plan policy. The commentary in relation to strategic views should be amended.
- 2) Include local views in policy but ensure wording sets out a positive approach to local view management and make clear new development can enhance these.
- 3) Ensure there are clear categories and hierarchy of significance with proportionate protection afforded to each. Strategic Views; Metropolitan Views; local views identified in conservation area audits, neighbourhood plans or briefs.
- 4) To support policy, consultation should be undertaken on an updated list of key Westminster / metropolitan views and a set of criteria for identification of local views following Regulation 19 consultation on the City Plan.
- 5) Include reference in policy to cross-borough views.

Appendix 1 Views Protected by the London Plan

Views Protected by the London Plan which affect Westminster	
<p>London Panoramas</p> <ul style="list-style-type: none"> • View 2 From Parliament Hill to central London (Protected vista) • View 4 From Primrose Hill to central London (Protected vista) • View 8 Westminster Pier to St Pauls (Protected Vista) 	<p>Linear Views</p> <ul style="list-style-type: none"> • View 7 The Mall to Buckingham Palace • View 8 Westminster Pier to St Paul's Cathedral • View 9 King Henry's Mound, Richmond to St Paul's Cathedral (Protected vista)
<p>River Prospects</p> <ul style="list-style-type: none"> • View 14 Blackfriars Bridge • View 15A Waterloo Bridge • View 16 The South Bank • View 17 Golden Jubilee/Hungerford Footbridges • View 18 Westminster Bridge • View 19 Lambeth Bridge • View 21 Victoria Embankment between Waterloo and Westminster Bridges • View 21A Jubilee Gardens and Thames side in front of County Hall • View 22 Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas' Hospital 	<p>Townscape Views</p> <ul style="list-style-type: none"> • View 23 Bridge over the Serpentine, Hyde Park to Westminster (Protected vista) • View 26 St James's Park Bridge to Horse Guards Road • View 27 Parliament Square to the Palace of Westminster



Appendix 2 Draft List of Local Views of Metropolitan Importance

<ul style="list-style-type: none"> • V1 Buckingham Palace from the Mall • V2/34 St James's Park Bridge Views • V3 St James's Palace from Marlborough Road • V4 St James's Palace from Piccadilly • V5 Carlton House Terraces from the Mall • V6 Foreign Office from St James's Park • V7 Admiralty Arch from the Mall • V8 Wellington Arch from Constitution Hill • V9 Marble Arch from Hyde Park • V10 Royal Albert Hall • V11 A, B&C The Albert Memorial from Kensington Gore • V12 Kensington Palace from Hyde Park • V13 Serpentine Bridge Views • V16 Palace of Westminster from Golden Jubilee Bridge • V17 Victoria Embankment towards the Palace of Westminster Clock Tower • V18 Churches of St Clement Danes and St Mary-le-Strand • V19 Royal Courts of Justice Law Courts from the Strand • V20 St Martin in the Fields from Pall Mall • V21 St Paul's Cathedral from Victoria Embankment outside Somerset House • V22 Dome of St Paul's from Somerset House River Terrace • V23 Somerset House from Waterloo Bridge 	<ul style="list-style-type: none"> • V24 A&B Battersea Power Station from Grosvenor Road & Chelsea Bridge • V25 Lambeth Palace from Lambeth Bridge • V26 Westminster Cathedral from Victoria Street • V27 Regent Street to Piccadilly • V28 Regent Street to All Soul's Langham Place • V29 Waterloo Place towards Piccadilly • V30 A&B Piccadilly Circus from Piccadilly & Lower Regent Street • V31 A&B Whitehall Views north & south • V32 A&B Trafalgar Square from outside the National Gallery & from the north Terrace • V33 A&B Trafalgar Square from Spring Gardens & Whitehall • V35 Horse Guards from Horse Guards Road • V36 The Holme across the Regent's Park Lake • V37 Parliament Square Views • V38 Westminster Abbey from Tothill Street • V39 York Gate and St Marylebone Church from York Bridge approach • V40 Big Ben Clock Tower from the bottom of Constitution Hill • V41 Somerset House internal courtyard views • V44 Westminster Bridge looking downstream • V45 South Bank Arts Complex from Waterloo Bridge 33
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- The Holme from Regent's Park



- Buckingham Palace from the Mall



- Foreign Office from St James's Park



- National Gallery from Trafalgar Square

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City of Westminster