

Statement of Common Ground
Westminster City Council and Historic England
October 2019

1. Introduction

1.1 This Statement of Common Ground has been prepared jointly between Westminster City Council (the council) and Historic England (HE) to set out areas of agreement between both parties in relation to Westminster's draft City Plan 2019-2040. It sets out issues in relation to a number of specific policies which were raised by HE as a result of the Regulation 19 consultation and a number of proposed minor modifications which have been agreed to resolve these issues. Outstanding matters are listed at the end of the Statement.

2. Background

2.1 Historic England's representation on the Regulation 19 draft City Plan (dated June 2019) welcomes the positive engagement and many of the changes made to the plan since the informal consultation draft in 2018. It also raises a number of areas of concern. Some of these concerns are fundamental (these are set out in section 4), but others can be addressed by amending the wording of policies to strengthen the plan. This statement sets out changes made to address comments on the following parts of the Plan: Policy 40 (Heritage), Objective 10, Policies 1, 4 and 39, the Glossary and KPI 25. All unresolved matters are set out in section 4.

2.2 HE advised that the need for conservation and enhancement should be a clear thread which runs through the entire plan, this has led to several minor suggested additions to policies.

2.3 Following a meeting on the 18th September 2019 to discuss these proposed amendments, a number of minor modifications have been proposed and this Statement of Common Ground is intended to agree these modifications. These will also be included within the proposed minor modifications schedule

2.4 Westminster City Council and Historic England have reached agreement on the changes to wording set out below. These changes will improve the plan and help identify the remaining areas of contention.

3. Agreed Policy Amendments

3.1 **Westminster World Heritage Site** Historic England representations stress the need to strengthen the World Heritage Site policy (Policy 40, clause D) further to ensure it aligns with obligations in the national and international legislation and responds to the recommendations of the ICOMOS/ICCROM Reactive Monitoring Mission to Westminster. It was noted that setting should feature more prominently in the policy and a clearer link made in policy to a commitment to delivery of the management plan. The following changes are agreed by HE as sufficient to overcome concerns and address all comments made in relation to the World Heritage Site policy.

Policy Name/ Number/ Para ref	Proposed Change/ Actions Agreed
Heritage Policy 40D (World Heritage Site)	Development will protect the <u>skyline, prominence and iconic</u> silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance <u>identified</u> significant views out of, across and towards the World Heritage Site.
Heritage Policy 40E (World Heritage Site)	The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. <u>The Council will commit to lead the production and review of an updated World Heritage Site Management plan.</u>
Heritage Policy 40F (World Heritage Site)	Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, <u>informed by</u> Heritage Impact Assessment

Heritage Site)	methodology <u>and any harm, including cumulative harm, has been avoided or justified.</u>
Supporting Text 40.5	Where development will affect the site or its setting, applicants should <u>will be required</u> to demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information should <u>will</u> be provided to demonstrate impacts have been considered. and <u>Depending on the scale and nature of proposals, in addition to the heritage statement,</u> this should include a Heritage Impact Assessment using the methodology set out by ICOMOS.
Supporting Text 40.4 (World Heritage Site)	As a designated heritage asset of international importance, it is of the highest level of significance and must be afforded the highest level of protection and maximum weight possible in the planning process. <u>Development beyond the designated boundary but within the setting of the site can also affect its OUV. Its setting is not precisely defined.</u>
Supporting Text 40.6	A number of significant projects will affect the World Heritage Site during the Plan period, in particular the Restoration and Renewal of the Palace of Westminster. We will work with partner organisations to ensure potential for the positive contribution of such projects to the conservation, enhancement and communication of OUV of the site <u>and its setting</u> is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm, approaches <u>and ceremonial routes</u> to the site, security measures and visitor experience will be encouraged and initiated where possible. We will support production of conservation management plans for the Palace of Westminster and Westminster Abbey to ensure the protection of the key buildings within the site and are <u>will lead</u> working with the steering group to update the management plan for the site. which is a key tool for the long-term sustainable management of the site and its setting.
Glossary	<u>Outstanding Universal Value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations.</u>
41 (Townscape and Architecture) Paragraph 41.17	Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city. The council will publish a list of views of metropolitan importance and prepare guidance on their management. <u>World Heritage Site views will be identified in the Management Plan.</u> Other views are important at a local level and may be identified by us or local communities in conservation area audits, neighbourhood plans or other area-based studies
KPI 25	Commitment to maintain the World Heritage Site Management Plan online as a 'living document' and keep this under regular review.

3.2 Policy 40 (Heritage) – Other issues A number of other issues were raised by HE in relation to the Heritage policy, in particular the need to strengthen policy in relation to historic parks and gardens, given their significance within Westminster and clarification in relation to the council's approach to facadism. Proposed changes are set out below, other changes suggested in Historic England's representation on this specific policy, unless listed in outstanding matters, it has been agreed are not necessary:

Policy Name/ Number/ Para ref	Proposed Change/ Actions Agreed
40Q (Historic parks and gardens)	Proposals affecting Westminster's historic parks, gardens and open spaces will safeguard their <u>special</u> historic <u>interest</u> , integrity, character and appearance, and protect their settings and significant views from and towards these spaces.
Supporting Text 40.26	<u>Development or proposals</u> affecting the layout, design, character, use and function of historic parks and gardens should retain and enhance their significance <u>and should not prejudice their future restoration.</u>
Supporting Text para 40.16 (Conservation	In some circumstances, demolition behind retained facades can provide a way to protect facades of townscape merit while allowing new accommodation to be developed behind this and may be acceptable where the overall integrity of unlisted

Areas)	buildings is maintained in street views <u>retaining side or rear elevations or roofscapes of townscape value. In all cases, we will only allow demolition where proposals for the future redevelopment of the site have been approved and their implementation assured by planning condition or agreement to avoid harmful gaps occurring within the townscape as a result of empty plots</u>
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3.3 Subject to the changes listed above in paragraphs 3.1 and 3.2, WCC and HE have reached agreement that all key areas of concern relating to the wording of Policy 40 (Heritage) including the World Heritage Site policy, have been addressed and that this policy now sound

3.4 **Other Policies** As noted above in addition to changes to heritage policy itself, HE have suggested a number of changes to ensure conservation and enhancement is a clear thread which runs through the entire plan. The following changes have been agreed:

Policy Name/ Number/ Para ref	Proposed Change/ Actions Agreed	Reason
Objective 10:	Make the most of our unique heritage and historic environment, <u>through its conservation and enhancement and encouraging innovation in building technology</u> <u>world class new buildings which sensitively integrate with the</u> historic <u>environment</u> and improve sense of place.	Given the significance of Westminster's historic environment, to explain 'make the most of' and clearly articulate our intention to conserve and enhance heritage as key objective.
Policy One, clause A7	Rephrase to read: "Protecting and enhancing the city's unrivalled heritage assets <u>(including their settings)</u> , and townscape value"	To acknowledge the importance of the setting of heritage assets.
Policy 4, para 4.6	Rephrase to read: "The area contains a significant number of larger and taller buildings which are primarily located along the key routes of Buckingham Palace Road, Vauxhall Bridge Road and Victoria Street. Victoria is also home to a significant number of heritage assets, <u>including several conservation areas</u> the Grade II Listed station, Grade I listed Westminster Cathedral and is in close proximity to the Royal Parks, the Thames and the Westminster World Heritage Site."	For completeness
Design principles 39B	All development will positively contribute and respond to Westminster's townscape and streetscape <u>including</u> having regard to: i. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and ii. the pattern and grain of existing streets, squares, mews and passageways <u>(part I split into two points to have clear point focused on character/townscape and heritage)</u>	To clarify the link between good design and conservation and enhancement of the historic environment and not merely requires development <i>to have regard</i> to heritage assets
Design principles 39B part V	... the form, character, ecological and <u>heritage</u> value of parks, gardens and open spaces".	To recognise the significant historic interest of parks and gardens in Westminster

3.5 It is agreed that the heritage evidence paper prepared is provides satisfactory background detail to support the above policies. Most other comments made at Regulation 19 Stage have been addressed and key issues which remain unresolved are set out in Section 4 below.

4. Unresolved Matters: Key Development Sites

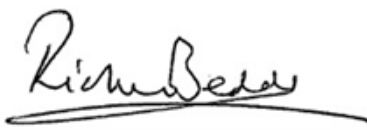
4.1 The lack of a published methodology and heritage evidence in relation to key development sites to support the plan's spatial approach, including the tall buildings methodology and policy, are issues that remain unresolved. HE are concerned that the suitability of key development sites has not been assessed, and they are unclear how the scale of development, set out in the plan, has been determined. Historic England question how key development sites can be delivered without harm to heritage. Historic England consider that some of the key development sites allocated have high heritage sensitivities and have advised that Heritage Assessments should be carried out to determine the suitability of sites as part of the evidence base, to inform the scale of development they can sustainably accommodate, and to inform development criteria in site specific policies. Historic England considers that these outstanding issues go to the heart of the plan's soundness.


4.2 The council recognises the heritage sensitivity of some of the Key Development Sites but considers that a sufficiently thorough and proportionate assessment of each KDS was carried out in advance of determining revised indicative housing figures for them. The Council intends to publish a topic paper to explain this methodology which included initial analysis of heritage sensitivity. The council consider that it is excessive to undertake a full Heritage Assessments for each KDS at this stage given that the housing figures are indicative only. The Council do not consider it is the role of the local plan to assess in detail the suitability or the capacity of sites in heritage terms. More detailed work will be undertaken and consulted on as part of the forthcoming Site Allocations DPD.

4.3 Westminster City Council and Historic England therefore remain in disagreement on these matters. WCC will share a draft of the key development site methodology in advance of submission to Secretary of State and this SCG will be updated accordingly should either party's position change.

5. Signed confirmation

5.1 Both parties consider that the amendments in Section 3 of this Statement of Common Ground address the concerns raised by Historic England in their representations in relation to the specified policies.

Signed on behalf of Westminster City Council		
Name and Position	Signature	Date
Cllr Richard Beddoe Cabinet Member for Place Shaping and Town Planning Westminster City Council		28th October 2019

Signed on behalf of Historic England		
Name and Position	Signature	Date
Katie Parsons Historic Environment Planning Advisor Historic England		21st October 2019