This booklet sets out the council’s proposed approach and planning policies for Heritage, Views and Tall Buildings.

Specific policies set out in this booklet are:

**Strategic Policy S25 Heritage and S26 Views, from the adopted City Plan**

**New City Management Policy:**
- CM251 Listed Buildings
- CM25.2 Conservation Areas
- CM25.3 Demolition
- CM25.4 Archaeology
- CM25.6 Westminster World Heritage Site

**New Strategic Policy Tall Buildings**

Whilst all policies will need to be taken into account, some particularly important aspects of this topic are included in separate booklets, namely: Design, Energy, Public Spaces and Advertisements; and Open Spaces.

In this booklet, references to the “City Plan” are to the completed local plan, which will integrate our Strategic and detailed City Management policies following the current review process.

We would welcome your views on proposed new policy wording, which is set out in the recommendations sections of this document and identified as NEW or shown as underlined. Adopted policy is shown in **bold** and is not intended to be altered as a result of this consultation. Detail of how to comment is set out at the end of this booklet.
Westminster is fortunate to have an exceptional legacy of historic buildings and spaces, which provide a record of the City’s history and development. Our historic environment makes a vital contribution to our success as a diverse and modern world city, contributing to distinctiveness and enhancing quality of life.

Heritage also makes a significant contribution to our economic prosperity and growth and is crucial to the City’s continuing attractiveness for the communities that live and work here. Westminster’s historic environment is not only valued by local residents and businesses; many of our historic buildings, spaces and attractions are of national and international importance and provide a draw to visitors from across the world.

Our historic environment is therefore an irreplaceable asset which we should value, protect and promote to ensure future generations can continue to enjoy the benefits that it brings. In doing so, we must remember we are only trustees of this inheritance for those that come after us. However, to have a sustainable future, heritage assets must also evolve to meet the changing demands of our dynamic city. I am therefore committed to working collaboratively with landowners, developers and local communities to enhance and bring new life to our historic buildings and spaces, allowing their sensitive adaptation to accommodate new and varied uses, improving access to heritage assets to ensure they can be used and enjoyed by all and upgrading buildings so that they will remain sustainable and can meet the needs of future communities and businesses. In doing this, I want to see development that integrates historic buildings with innovative modern architecture and vibrant public spaces while protecting the many cherished views of our important landmarks and townscape.

This consultation booklet sets out the emerging policy framework for managing change in the historic environment, including our policy on views and tall buildings. We are now inviting your comments on our approach and look forward to working with you so we can develop policy on this issue which will ensure our historic environment is protected and enhanced and will continue to be an integral part of a sustainable, prosperous Westminster for both present and future generations.

**FOREWORD**

**CLLR ROBERT DAVIS**

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Councillor Robert Davis DL
Deputy Leader, Westminster City Council
Cabinet Member for Built Environment
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1.1 BACKGROUND  WESTMINSTER’S HISTORIC ENVIRONMENT

Westminster’s historic environment is one of its greatest assets. The unique character of the City derives in large part from both the concentration and importance of its heritage assets, many of which are of national and international importance.

Heritage designations in Westminster include more than 11,000 listed buildings, one of the highest concentrations of nationally important historic buildings of any local authority in the country. There are also 56 conservation areas covering almost 77% of the City and including many of central London’s most cherished areas of townscape. Our archaeological heritage includes five archaeological priority areas and two scheduled ancient monuments. Many of Westminster’s open spaces are also specifically designated for their historic interest. These include 250 hectares of historic Royal Parks, 21 registered historic parks and gardens, as well as 85 ‘London Squares’ protected under the London Squares Preservation Act 1931. Finally, the City is crossed by five strategic viewing corridors including those to the World Heritage Site: the Palace of Westminster and Westminster Abbey (including St Margaret’s Church).

These heritage assets are an irreplaceable resource and a fundamental part of what makes Westminster unique and attractive as a place to live, work and visit.

“Buildings, landscapes and monuments – the physical survivals of our past – are protected not their own sake but for our benefit and that of the generations who will succeed us. They are an integral part of our cultural identity and contribute towards a strong sense of place, whether in a local, regional or national context.”

1.2 BACKGROUND  WIDER VALUE OF THE HISTORIC ENVIRONMENT

Westminster’s heritage assets are not only of value for their contribution to local character but bring many wider benefits to the City and play a significant role in our continued sustainable economic growth. The historic environment has been identified as a key reason why businesses choose to locate in Westminster¹ and national research has revealed the positive impact historic buildings have on the UK economy as a whole, 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 services².

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 16 million international visitors to London in 2013³ making it one of the most popular holiday destinations in the world. Visitor surveys show many of London and the UK’s most visited tourist attractions are historic buildings and areas located in Westminster⁴.

Heritage assets also contribute to the attractiveness and mix of local residential neighbourhoods across Westminster. The City contains some of the capital’s most desirable residential neighbourhoods, which owe much of their appeal to their historic buildings. Our historic spaces and cultural attractions provide recreational opportunities for local communities and Londoners, enhancing quality of life and contributing to health and well-being.

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 needs 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.

The economic prosperity and continued positive growth of our City will rely heavily on the promotion, conservation and positive management of the historic environment. Recognition of the wider value of heritage assets will therefore be crucial in developing Westminster’s policy framework and must be embedded in policy across the new plan.

“Heritage is not an adjunct to a healthy economy, but a major driver of economic growth and a source of employment. Heritage-related tourism alone accounts for £4.3 billion of GDP and creates employment for 113,000 people” Investing in Success: Heritage and the UK tourism economy, Heritage Lottery Fund, 2010

¹The Importance of the Historic Environment to the Office Market in Westminster (2007)
² New Ideas Need Old buildings HLF (2013)
³ The International Passenger Survey (2013)
1.3 BACKGROUND  Heritage Assets: Policy context

The main government advice on planning for the historic environment is set out in the National Planning Policy Framework (NPPF). This outlines twelve principal objectives for planning, one of which is the conservation of heritage assets for the quality of life they bring to this and future generations. It requires local authorities to prepare a positive strategy for the conservation and enjoyment of the historic environment in their local plan, seeking improvements in the quality of the historic environment in the pursuit of sustainable development.

Westminster’s adopted City Plan: Strategic Policies include an overarching Heritage Policy S25, which sets out our aim to conserve heritage assets. However, the quality and extent of the historic environment in Westminster requires a comprehensive and robust policy framework which explains how we will apply this strategic policy to different types of heritage assets based on an understanding of what makes them significant.

Our detailed policies on heritage are currently saved as part of the Unitary Development Plan (UDP), adopted in 2007. Although the duties in legislation in relation to heritage assets remain largely unchanged since these were adopted, the NPPF and the national heritage policy that it replaced (Planning Policy Statement 5, 2009) introduced new terminology which has subtly changed the way in which the historic environment is managed. The existing policy in the Unitary Development Plan is therefore being updated and emerging policy will retain the substance of UDP policy, but more closely reflect the terminology set out in the NPPF.

"Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).” Glossary, NPPF (2012)
2.1 INSIGHTS: Understanding Heritage Values and Significance

Significance

At the heart of the approach to heritage management set out in the NPPF is the idea of significance. This is the word used to describe what it is that makes a particular building, place or asset important and of value to society. The NPPF makes clear that all heritage assets should be conserved in a manner which is appropriate to their significance. This means that a detailed understanding of why each asset is significant and the particular qualities and characteristics that contribute to understanding this significance must be the starting point for decision-making and policy. The NPPF indicates that significance may derive from an asset’s archaeological, architectural, historic or artistic value. English Heritage provide further advice on the values which make our historic environment important (see right).

In Conservation Principles (2011), English Heritage set out a number of heritage values which may be ascribed to a building place or asset and make up significance. These values can incorporate:

- **evidential value** - relates to the potential of a place to yield primary evidence about past human activity;
- **historical value** - relates to the ways in which the present can be connected through a place to past people, events and aspects of life;
- **communal value** - relates to the meanings of a place for the people who relate to it, and whose collective experience or memory it holds;
- **aesthetic value** - relates to the ways in which people derive sensory and intellectual stimulation from a place.

Setting

The NPPF states that a heritage asset’s significance can also derive from its setting, which it defines as the surroundings in which an asset is experienced. Any development within this setting may affect significance. For example, this may include development outside but adjacent to a conservation area, or development which affects views and understanding of the historical context of a listed building.

Elements of setting may make a positive or negative contribution to the significance of an asset. Our emerging policy for all types of heritage asset therefore promotes change which will enhance the setting of heritage assets wherever possible. It also seeks to ensure that the impact of a development on setting is considered in a way which is proportionate to the nature, extent and level of significance of different heritage assets and which recognises the potential impact of cumulative change on setting.
2.2 INSIGHTS Designated Heritage Assets and Legislative Duties

Where heritage assets are given a statutory designation, this identifies that they are of a level of significance which justifies special protection measures. These are known as ‘designated heritage assets’. The NPPF gives specific guidance about their management and states that the greatest weight should be attached to those heritage assets which are considered to be of the ‘highest’ significance.

The council also has a number of duties set out in legislation in relation to conservation of designated assets which must be taken into account in making new policy and decision-making.

Outside areas which benefit from statutory protection and designation, the historic environment can nonetheless be of significance to local communities and contribute to historical understanding and local distinctiveness. The NPPF refers to these as ‘non-designated’ assets.

Our new policies seek to ensure an appropriate level of protection is applied to different types of heritage asset, taking into account both their significance and relevant statutory duties.
As the NPPF definition makes clear (right), conservation is a dynamic process which seeks to manage change, accommodating modern needs in a way which also protects the significance of what we have inherited, and encouraging enhancement which will allow the historic environment to continue to be used and appreciated.

When considering planning applications which affect heritage assets, the NPPF requires ‘great weight’ to be given to their conservation i.e. the need to protect and enhance the historic environment should be a primary objective. The degree of change which is appropriate will depend on the building, structure or asset, what makes it important and how proposals will affect this, taking into account the type and level of designation and associated statutory duties (see previous page).

The NPPF also states that, in some circumstances, harmful change may be permitted where there are public benefits that outweigh harm. Any change to a heritage asset may be harmful, ranging from relatively small-scale physical alterations such as altering windows, to total destruction of archaeology or demolition of buildings. In all cases, clear and convincing justification will be needed to explain why this is necessary. However, the degree of harm will affect how decisions are reached and the NPPF distinguishes between substantial or less than substantial harm, setting out different tests which apply in considering these.

‘Public benefits’ are likely to be those that meet one or more of the objectives of sustainable development – social, economic or environmental – and must bring advantages for the wider community. This may include heritage benefits such as improving public access to the historic environment, or securing long-term maintenance. In the majority of cases, a conflict between providing public benefits and conservation will not be necessary and public benefits can almost always be achieved with less or no harm, for example by changing the proposed design or amending the location.

Emerging policy seeks to ensure an appropriate balance is struck for different types of heritage assets, which allows sensitive change based on detailed understanding of the particular asset’s significance and its vulnerability to harm.
# 2.4 RECOMMENDATIONS

**Heritage Assets**

**Environmental Performance** The adaptation and reuse of historic buildings is an inherently sustainable activity and the energy embedded in them is an investment. Through informed, careful adaptation we can not only reduce the amount of energy expended in creating new development, but also achieve greater energy efficiency, sustaining the utility of historic places into the future. See CM28.8, p19-20.

**Conserve** The NPPF makes clear that conservation is not a static process. It involves both maintaining and managing change to heritage assets and should seek to reinforce, promote and enhance significance.

**Policy S25 Heritage**

Recognising Westminster’s wider historic environment, its extensive heritage assets and their settings will be conserved, including its listed buildings, conservation areas, archaeological heritage, historic parks including the five Royal Parks, squares, gardens and other open spaces, the Westminster World Heritage Site and, where appropriate, any non-designated heritage assets in the wider historic environment, their settings, and its archaeological heritage. Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible.

Wherever possible and appropriate, development should sustain and optimise the positive role of the historic environment in Westminster’s development and economy, including in particular promoting public enjoyment and awareness of the City’s heritage.

All development proposals which may have an impact on a heritage asset or its setting should be supported by information which demonstrates a clear understanding of and is proportionate to the significance of the asset. Any works that would lead to harm to significance of heritage assets will require clear and convincing justification including an assessment of any public benefits.

**Wider Historic Environment and Non-designated assets**

Buildings, open spaces or archaeology which are not designated through legislation can also be of heritage value in a local context. The NPPF states that the effect of an application on the significance of non-designated heritage assets should be taken into account in determining applications. This may include buildings, spaces and structures, archaeological deposits and street furniture of local historic interest, which come to light as part of the development management process, through local survey such as the creation of local lists or as a result of requests from local communities. (The adopted strategic policy has been amended to make clear what is meant by ‘the phrase wider historic environment’).

**Promoting positive role of the historic environment**

The key role of the historic environment in Westminster’s sustainable growth should be maintained and optimised and we are proposing to amend the strategic policy to encourage development to take opportunities to draw on the contribution made by the historic environment to Westminster’s character and economy particularly where this will promote public awareness of Westminster’s historic environment locally and nationally, and reinforce our role as a culturally diverse World City.

**Demonstrating an Understanding of Significance**

For different types of heritage asset, a different approach to their conservation will be required, taking into account their designation and based on an understanding of their significance. Applicants will be required to provide an analysis of the asset and demonstrate in their heritage statement what factors contribute to significance and how proposals will affect this. This should include justification for why any harm is necessary, including what alternatives have been considered and any public benefits that may occur. Where works will affect the setting of a heritage asset, the assessment should detail the degree to which proposed changes enhance or detract from significance and the ability to appreciate it. In all cases, the level of information required will be proportionate to the significance of the asset and the type of development.

**Access:** There will almost always be scope to improve access to the historic environment. This may not just be about physical access but should also consider the ways in which services and information can be provided to meet the needs of all users. Guidance on improving physical accessibility to historic buildings is contained in English Heritage Guidance Access to Historic Buildings (2012) & Westminster’s Inclusive Access SPG (2007).

See Design Booklet for design principles (including Inclusive access) and more detail on retrofitting sustainability measures.
Listed Buildings are designated by the Secretary of State in recognition of their national special historic or architectural interest. This may be for a number of reasons, for example they may be a very rare or complete example of their type, be of exceptional architectural quality or be value due to their age or as a part of a group. The proportion of listed buildings as a percentage of the total housing stock nationally is around 1-1.5%. As such, they are a precious and finite resource of national importance and our policy must ensure they are afforded the highest levels of protection.

Understanding the special interest (or significance) of each listed building is the starting point for decision-making. Listed buildings are classified into grades (I, II*, II) and this is one indication of their importance. However, the sensitivity of a building to change is not necessarily related to its grade and all proposals should be based on an assessment of what elements make that particular building or structure special or significant.

Historic fabric is one of the most tangible and important elements which contributes to significance of listed buildings and the loss of original or important fabric should always be minimised. However, special architectural or historic interest goes beyond fabric and appearance. A structure may also have established significance as a result of various uses throughout its existence or historical or cultural associations. It may be that a building designed for one purpose has become important for a variety of reasons not necessarily directly related to its original use.

Policy therefore seeks to ensure that where development affects a listed building, the features, fabric and other elements which contribute to special interest are identified and protected and any new work is undertaken sensitively.

1 DCMS Principles for the Selection of Listed Buildings (2010)
2 EH Heritage and Growth 2012

With over 11,000 listed buildings, Westminster has one of the highest concentrations of listed buildings of any local authority in the country and has a higher than average percentage of Grade I and II* buildings than found across the rest of England (nationally, 92% of buildings are Grade II). Less than 1% of Westminster’s listed buildings are on the ‘at risk register’ (nationally 4.1% of listed buildings are at risk).
3.2 RECOMMENDATIONS  Listed Buildings

Conserve  As set out previously, conservation includes the concept of enhancement. In the case of listed buildings, it may be possible for important original detailing, fabric and features which are missing or hidden to be reinstated or better revealed during the course of works.

Architectural theft  Historic fixtures and fittings are at particular risk of damage or theft when buildings are vacant, undergoing work or on the market.

Setting  In some circumstances the setting may comprise a garden or grounds that have been laid out to complement its design or function. However, this is not the same as and will often be more extensive than curtilage and development at some distance may also have an impact on its setting. Development within the setting should take opportunities to enhance or better reveal significance of listed buildings wherever possible.

Use  In general the best use for a building will be that for which it was built, as this will, in most cases, be part of its significance. However, most listed buildings need to remain economically viable if they are to be maintained in the long-term and changes of use which may require planning permission can be the best way to secure this. Where a change of use is proposed, the building should, so far as possible, be capable of being converted into the new use without harmful extensions or modifications, especially if the change of use would require new openings, staircases, and substantial subdivisions to the historic floor plan or loss of historic fabric. Issues such as fire protection, sound proofing, servicing and access will also require detailed consideration. In finding the optimum viable use for a listed building other land use policies may need to be applied flexibly and imaginatively to achieve long-term conservation. See also Policy S27 which protects uses of national and International Importance.

Features and fabric which contribute to ‘significance’ are the physical elements that reveal the national special architectural and historic interest and these will vary depending on the building or structure. These can be external or internal features. Original and historic fabric is one of the most important and tangible elements which contributes to understanding significance. Other elements which contribute to significance of listed buildings may include the plan form, location and hierarchy of rooms, historic floor levels, the structure of the building (including foundations), as well as particular features such as staircases and roof structures. This can include original as well as later additions. As well as the building itself, the listing also includes any curtilage object or structure which forms part of the grounds and has done so since 1st July 1948. Features protected by the listing and contributing to the significance may include boundary treatments, steps, paving and outbuildings. On listed buildings even relatively small alterations may constitute substantial harm, as set out in the NPPF.

The total loss of listed buildings will be resisted in all but exceptional circumstances. Where total or significant demolition is proposed, see specific policy on demolition: CM25.3 (p18).

Period and architectural detail  Listed buildings in Westminster include a huge range of building types from all periods. All new works must relate sensitively to the architectural detail and period of the original building, bearing in mind that later phases of work may also be part of its significance. Particular care and attention are required in planning works to listed buildings. High-quality craftsmanship will be required to ensure that authentic detailing is achieved and in almost all cases the materials used for alterations, extensions or repairs should match the original and the use of non-traditional materials will not normally be acceptable.

Policy on Listed Street Furniture is included in the Public Realm and Advertisements booklet at: CM28.13 Attractive Accessible and Secure Streets.
4.1 INSIGHTS Westminster’s Conservation Areas: Character and Significance

Local authorities have a duty to identify parts of their areas which are of special architectural and historic interest, designating them as conservation areas, and keeping these under review\(^1\). Conservation area designation recognises not just individual buildings, but the wider characteristics of townscape, taking account of historic building types and scale, the street pattern and historic layout of buildings and spaces, the particular mix of land uses and contribution of public and private spaces, such as gardens, parks and squares, as well as trees, street furniture and particular views - all the elements which combine to make up the familiar local scene\(^2\).

Westminster’s outstanding and diverse range of conservation areas include areas of Georgian and Victorian terraced housing, post-war housing estates, areas dominated by government and institutional uses and more mixed central areas such as Soho and Marylebone, where the historic layout and the dense urban character combined with the mix of uses, creates distinctive local character. Many of Westminster’s conservation areas have a high proportion of listed buildings and some contain townscape of more than local significance. The NPPF states that when considering the designation of conservation areas, local planning authorities should ensure that area justifies such status. The council also has a statutory duty to preserve or enhance the character and appearance of conservation areas. It is therefore important to identify what it is about each area that makes it of special architectural and historic interest, and particular features that contribute to its character and appearance. Policy sets out how the council will preserve and enhance those features.

1 Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990
2 NPPF Para 127
4.2 RECOMMENDATIONS CONSERVATION AREAS

Positive contribution It is particularly important within conservation areas that design is appropriate to its context and any proposals start from an understanding of those elements which contribute to Westminster's local distinctiveness. Features such as buildings, spaces, street furniture, trees and views may contribute to the character and appearance of an area and its special architectural and historic interest. Applicants will need to demonstrate how their proposal will affect the character and appearance of the area. National guidance recommends that local authorities set out the elements which contribute to special architectural and historic interest and how we will protect and enhance these in conservation area appraisals and management plans. In Westminster Conservation Area Audits analyse each area and identify buildings, features, views and elements which are considered to contribute to the area’s character and appearance. They also provide details of negative features and enhancement opportunities.

NEW POLICY CM25.2: CONSERVATION AREAS

Development within or affecting conservation areas will contribute positively to the character and distinctiveness; and take opportunities to enhance the character and appearance of the area and its setting wherever possible.

Enhancement opportunities may include:
1. replacement or improvement of any building, feature or element which detracts from the character of the area or its setting;
2. reinstatement of missing architectural detail or other important features; and/or
3. improvement of open spaces and the wider public realm, and reinstatement of historic routes and characteristic plot patterns.

Development will not:
1. harm buildings, spaces or other features which contribute positively to the significance of the conservation area;
2. Involve the loss of traditional, historic or important features, and detailing including shopfronts, doors, windows and other decorative detail
3. introduce design details and materials, such as uPVC and aluminium windows and doors, which are out of character with the building and area; or
4. harm the setting of a conservation area.

Changes of use will be acceptable where they make a positive contribution to the character, function and appearance of conservation areas and their settings. The council will consider the contribution of existing uses to the significance of an area when assessing change of use applications.

For more detailed policy on criteria for assessing design of new development, including infill and alterations and extensions, see the Design Booklet.

Enhancement The NPPF states that local authorities should look for opportunities within conservation areas and their settings to enhance or better reveal their significance. Development in conservation areas will be encouraged to take opportunities to enhance the area wherever possible. Where a building or feature has been identified as having a negative impact on an area, a proactive approach to improvement will be sought.

See also the policy on demolition. CM25.3 on p18 and views on p32.

The spaces between buildings are particularly important to the character of conservation areas. There is further advice on high quality public realm in the Public Realm and Advertisements Booklet and the Westminster Way SPD.

Harm We will take into account whether the proposal constitutes substantial or less than substantial harm, and weigh this against any public benefits, including heritage benefits.

Land uses and activities are fundamental to the character and appearance of Westminster’s conservation areas. Particular uses are of historic importance to certain areas and some are of national or international importance. These will have influenced the evolution and built form within an area and may continue to have a strong effect on its character today. Different users of buildings and spaces also change and shape their character over time and some conservation areas are strongly influenced by the communities which occupy them. In some cases the importance of particular uses has also been recognised by the designation of Special Policy Areas which protect certain uses. See booklet no 6 Westminster’s economy.

Trees within conservation areas are protected. Trees policy is in the Design Booklet at: CM25.3.
5.1 INSIGHTS DEMOLITION OF LISTED BUILDINGS AND BUILDINGS IN CONSERVATION AREAS

By their nature, heritage assets are irreplaceable and their total loss should therefore be exceptional. The retention and creative re-use of historic buildings also helps preserve the ‘embodied’ energy expended in their original construction, and can dramatically reduce whole-life energy costs while minimising waste impacts that would result from demolition and construction¹.

In some circumstances, however, demolition of historic buildings (either a listed building or an unlisted building which makes a positive contribution to the character of a conservation area) may be allowed where it results in an exemplary new development which brings substantial public benefits which outweigh the loss.

A specific policy has therefore been drafted to set out how we will assess the acceptability of demolition, taking into account the level of designation and significance of the building and following advice in the NPPF.

As listed buildings are recognised for their national (and sometimes international) significance they must be afforded the highest levels of protection. The loss of any listed building therefore constitutes substantial harm as defined in the NPPF and will be refused permission in all but the most exceptional circumstances. Exceptional circumstances under which demolition may be permitted are set out in the NPPF (see right).

In conservation areas, national guidance² states that the council should identify buildings which make a positive contribution to the character of the area. Westminster’s conservation area audits identify such buildings as unlisted buildings of merit. Where buildings are identified as making a positive contribution to an area, their total demolition will usually be resisted and demolition will only be approved where it can be demonstrated that the public benefit outweighs the case for retention.

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¹ PPS5 Practice Guide (2011)
² English heritage (2011) Understanding Place: Conservation Area Designation, Appraisal and Management
5.2 INSIGHTS DEMOLITION

There are also other buildings within historic areas which make a negative or neutral contribution to the area and where enhancement will be sought. Conservation area audits identify buildings which detract from areas and their sympathetic redevelopment will be encouraged.

In all cases where demolition is permitted the design quality of the new development should result in an enhancement to the conservation area and integrate exemplary principles of sustainability in all aspects of its design. The re-use of existing buildings preserves the ‘embodied’ energy expended in their original construction, minimises construction waste and reduces the use of new materials. Any replacement building should also deliver a substantial improvement in environmental performance on-site, as compared to the environmental performance that could be achieved by refurbishing the existing building taking into account its full life cycle.

FAÇADE RETENTION

In some locations, the retention of a building’s façade may be acceptable and offer a compromise, allowing protection of facades of townscape merit, reducing embodied carbon impacts by retaining some fabric, while allowing new and upgraded accommodation to be developed behind this. This should, however, not result in the loss of side or rear elevations or roofscapes which have townscape value in their own right and visually, it is important to ensure retained façades maintain an architectural relationship with the new building. The stability and architectural integrity of the retained part of the building will also need to be ensured. This is most likely to be considered for unlisted buildings in conservation area, but may in some limited exceptional circumstances be considered for listed buildings, depending on the significance of the building and where this would not result in the loss of any significance interiors.
NEW POLICY CM25.3: DEMOLITION OF LISTED BUILDINGS AND BUILDINGS IN CONSERVATION AREAS.

The council will resist the total or substantial loss of:

- listed buildings in all but exceptional circumstances
- unlisted buildings which make a positive contribution to the character and appearance of conservation areas unless it can be demonstrated that the public benefits of the proposals outweigh the case for retention of the building

Demolition behind retained facades may be allowed depending on the significance of the asset where it will secure the retention of façades which make a significant contribution to local townscape, it will maintain the scale of original rooms behind principal facades and the demolition is considered otherwise acceptable having regard to the above policy considerations.

Where an existing building makes a neutral or negative contribution to a conservation area, the council will encourage:

1. its demolition and replacement with a high quality building with enhanced environmental performance; or
2. Where appropriate, its improvement, re-cladding or refurbishment to improve both its appearance and environmental performance.

In all cases, demolition will only be permitted where:

1. Any replacement building will be of exceptional design quality and deliver an enhancement to the area and improvement in environmental performance on-site, taking into account whole life cycle energy costs.
2. firm and appropriately detailed proposals for the future redevelopment of the site have been approved and their implementation assured by planning condition or agreement.

Exceptional circumstances are those set out in the NPPF at paragraph 133 and will take account of the level of designation. The NPPF states that total loss of a Grade I or Grade II* building should be wholly exceptional. The loss of Grade II building should be exceptional.

Public Benefits means benefits for the wider community, which may include environmental, social and economic benefits and heritage benefits such as preservation and enhancement of the conservation area.

Unlisted buildings which are considered to make a positive contribution may be those identified as unlisted buildings of merit either through the development management process or in a conservation area audit. In conservation areas, loss of an unlisted building will usually constitute substantial harm to the designated heritage asset (conservation area) but may be considered less than substantial harm depending on the nature of the building and its contribution to the conservation area. Where works constitute substantial harm tests for exceptional circumstances set out in the NPPF at paragraph 133 will apply. Otherwise tests at paragraph 134 will apply. In some circumstances, an unlisted building may be an undesignated heritage asset which has heritage value in its own right, not just as a part of the wider conservation area.

Façade retention this will usually only be considered on unlisted buildings. It is unlikely to be acceptable for Grade I and II* buildings and for Grade II buildings, may be considered in exceptional cases, where NPPF tests have been met, and taking into account significance, especially of interiors.

Negative buildings are identified in conservation area audits. Their demolition will usually be encouraged but in some circumstances, their refurbishment and upgrading may be appropriate.

Some buildings neither detract from nor contribute to character of conservation areas (identified as neutral buildings in conservation area audits) and arguments for their retention or demolition are more finely balanced. In addition to any townscape value, the re-use of existing buildings preserves the ‘embodied’ energy expended in their original construction, minimises construction waste and reduces the use of new materials. In considering such cases, in addition to townscape considerations, the council will consider which option is the most sustainable. Where a proposal would result in demolition the replacement building will need to deliver a substantial improvement in environmental performance on-site, as compared to the environmental performance that could be achieved by refurbishing the existing building. For major sites where opportunities for a refurbishment could be considered, development should clearly demonstrate that the demolition and redevelopment of a site, has been weighted up against improving the existing performance of the building and that the most sustainable outcome has been shown.
6.1 INSIGHTS RETROFITTING HISTORIC BUILDINGS FOR ENVIRONMENTAL SUSTAINABILITY

The design booklet sets out further information on the importance of retrofitting Westminster’s existing building stock to enhance its environmental performance. However, the concentration of heritage assets in Westminster means that a significant proportion of this existing building stock will also be protected by heritage designations.

To ensure historic buildings have a sustainable and economically viable future, and can continue to meet the needs of and be attractive to future occupants, it is crucial to ensure that we also encourage sensitive retrofit which will reduce energy consumption and address the issues associated with a changing climate.

Our historic building stock is particularly sensitive to the impact of certain retrofitting measures and special consideration must be given to ensure improvements to environmental performance and thermal upgrading are undertaken in sympathetic ways. In addition to the impact on aesthetic and historic significance of heritage assets, traditional building construction and materials also perform differently to modern construction and this should be taken into account when proposing retrofitting works.

Further information can be found in the council’s guidance on Retrofitting Historic Buildings for Sustainability.

Diagram taken from recent research showing the benefits of retaining existing buildings. Retrofitting to a very high standard ‘B’ results in lower carbon emissions than demolition and rebuilding to Passivhaus quality ‘C’.

Based on 60 year lifecycle emissions. After around 100 years the Passivhaus will perform better than the Retrofit but note that the materials used in its construction may be less durable and elements will require replacement. The existing building is likely to have a longer life if it is subject to heritage protection.

Source: Sturgis carbon profiling, exert from Building Magazine
6.2 RECOMMENDATIONS Retrofitting Sustainability Measures to Existing Buildings

Improving Environmental Performance: may include measures to reduce of carbon emissions, improve resource use efficiency, and minimise pollution and waste. For historic buildings simple measures such as draught proofing, energy and water efficient appliances, roof insulation and repair and maintenance work can bring substantial improvements and have minimal other impacts, both visually and on historic fabric and traditional construction. Such minor interventions should always be considered first as these are usually non-contentious, may not require permission and can provide significant benefits at low cost.

**NEW Policy CM28.8 Retrofitting Sustainability Measures**

- Works to upgrade the environmental performance of existing building stock which incorporate good standards of design and appearance will be supported.
- Where this involves buildings subject to heritage protection, a sensitive approach will be required, taking into account:
  - the significance of the building; and
  - the degree of harm, including impact on historic fabric, traditional construction, visibility, siting and design.

**Significance**

The designation and grade of the building should be considered as well as the particular features which make the building significant.

**Traditional construction**

A traditional building is defined as a property built prior to 1919 with solid walls constructed of moisture-permeable materials\(^1\). Traditional buildings perform differently in some respects from modern buildings, both in their existing state and when subjected to retrofit measures. Applicants should also consider the impact of new technologies on traditional construction and ensure this has no adverse impact.

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Westminster’s archaeological heritage

Archaeological remains are a particularly fragile part of our heritage. In Westminster, investigation to date has revealed evidence of prehistoric, Roman, Saxon Medieval and post Medieval archaeology* and a great deal more is likely to exist which is as yet undisturbed.

There are two Scheduled Ancient Monuments designated for their national importance (the Chapter House and Pyx Chamber next to the Cloisters, Westminster Abbey; and The Jewel Tower) and the council will expect these to be afforded the highest levels of protection. In addition, Westminster has five Areas of Special Archaeological Priority (right) which have been specifically identified as high in archaeological potential. In these areas and in others which may have archaeological potential, policy seeks to ensure applicants have properly assessed and planned for the archaeological implications of their proposals through an archaeological assessment and evaluation of the site.

The design of development should make provision for the incorporation, safeguarding and preservation in situ of archaeological remains wherever possible and there will always be a presumption in favour of the retention of nationally-important archaeology in situ. Where the council agrees that the conservation of archaeological remains in situ is impossible or deposits are considered to be of lesser significance, full investigation, recording and an appropriate level of publication will be required.

The NPPF makes clear that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

“Every opportunity to bring the story of London to people …should be exploited. In particular, where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset.” London Plan 2011

* Information on Westminster’s archaeology can be found in the Greater London Historic Environment Record maintained by English Heritage
NEW POLICY CM25.4: ANCIENT MONUMENTS AND ARCHAEOLOGY

Development will conserve the following Scheduled Ancient Monuments and their settings:
- Chapter House and Pyx Chamber next to the Cloisters, Westminster Abbey; and
- The Jewel Tower.

Development which involves excavation or ground works in Westminster’s areas of special archaeological priority or areas suspected of having archaeological potential will properly evaluate the archaeological potential and significance of the site and plan for any archaeological implications of proposals. It will make provision for:

1. all archaeological deposits of national or London-wide importance to be conserved in situ;
2. deposits of local archaeological value to be conserved in situ where practicable; and
3. any impacts of development on preserved deposits to be minimised through design; or
4. where the council agrees that the conservation of archaeological remains in situ is impossible and/or deposits are considered to be of lesser significance, full investigation, recording and an appropriate level of publication will be undertaken.

Where archaeological site investigation is necessary, the council will require a written scheme of investigation to be completed and agreed prior to commencement of the development, and will secure its implementation through conditions. This archaeological investigation will incorporate a proportionate level of community engagement and involvement.

Areas of Archaeological Priority have been specifically designated as high in archaeological potential. For sites involving significant ground works in areas of archaeological potential a more detailed archaeological desk based assessment and in some circumstances, site investigation may be required.

Non-designated sites suspected of having archaeological potential There may also be areas which are not currently designated which have archaeological potential. The Greater London Historic Environment Record maintained by English Heritage contains further information about sites and areas of archaeological significance, including the Thames foreshore, banks and river walls. For small scale development archaeological significance can normally be assessed in the heritage statement.

National/Local Archaeological Value

The approach taken to the conservation of archaeological deposits will depend upon their significance. Deposits of national or London-wide significance should usually be preserved in situ. However, where a particular development has been approved it may not be possible to preserve archaeological remains in situ.

Proportionate
Where archaeology is present, some form of interpretation and presentation to the public should form part of the development proposals. This may include public access, where appropriate.

Archaeological Investigation
Where site investigation is required, the written scheme of investigation sets out the structure for exploring known and potential archaeological deposits on site. Archaeological evaluation and investigation should be undertaken by an IFA registered Archaeological Organisation or a suitably qualified archaeological organisation acceptable to the council.
8.1 RECOMMENDATIONS Open Spaces protected by Heritage Designations

Westminster has a rich heritage of historic parks and gardens including garden squares, designed landscapes, public parks, churchyards and private gardens. These are a particularly cherished part of Westminster’s heritage, an intrinsic part of the City’s development and character.

English Heritage compiles a register of gardens which are considered to be of national special historic interest. As with listed buildings these are graded I, II* and II. The significance of any registered park or garden is a material planning consideration and subject to the advice on designated heritage assets set out in the NPPF. Most squares in Westminster are also protected by the London Squares Preservation Act 1931 and many other gardens and open spaces contribute to the setting of conservation areas and listed buildings. Open spaces, gardens and parks can also be of local historic interest. In London, these are recognised on the London Inventory of Parks and Gardens of Local Historic interest which has been produced by the London Parks and Gardens Trust, and where open spaces contribute to the character of conservation areas, they are also identified in conservation area audits.

Features which contribute to landscape character and the significance of historic parks and gardens may include original layout and planting, garden buildings and original features such as railings, steps and fountains. Views from and towards historic open spaces can also be a particularly significant part of their character and the impact of development on the setting of open spaces should be carefully considered.

Open Spaces of Heritage Value. Where development proposals or landscaping affect a designated park or garden, great weight should be given to its conservation. Applications should be supported by documentary evidence explaining the historic significance and information on the historic landscape design and its degree of survival should accompany the application.
9.1 INSIGHTS PROTECTING THE WESTMINSTER WORLD HERITAGE SITE

The Palace of Westminster and Westminster Abbey including St Margaret’s Church was inscribed as a World Heritage Site in 1987.

World Heritage Sites are identified on the World Heritage List by UNESCO¹ to highlight their Outstanding Universal Value (OUV). OUV is the term used to describe the significance of a site which is considered so exceptional as to transcend national boundaries. This means that they are heritage assets of international importance and should be afforded the highest levels of protection.

A Statement of Outstanding Universal Value has been prepared to provide an overview of why the site as a whole is significant. Policy seeks to ensure applicants take full account of the potential impact of their proposals on the World Heritage Site and its Outstanding Universal Value.

The UNESCO Operational Guidelines² recommend that specific ‘attributes’ should be identified which are associated with or express the Outstanding Universal Value. These are individual elements which contribute to and help us to understand the overall OUV or significance of the site. An initial draft list of attributes for the site is set out overleaf.

UNESCO has expressed concern about protection of the site and the impact of large scale development on its setting on a number of occasions and visited for a monitoring mission in 2011. The World Heritage Committee subsequently recommended that work was undertaken to more clearly define the immediate and wider setting and that this should be included within policy frameworks (see further info on p26).

OUTSTANDING UNIVERSAL VALUE OF WESTMINSTER WORLD HERITAGE SITE

- The importance, as a group, of the three buildings of the Palace of Westminster, Westminster Abbey and St Margaret’s Church which together symbolise UK, monarchy, religion and political governance.

- Westminster as the site of the development of parliamentary ideals since the 13th century and as the pre-eminent symbol of the democratic institution.

- The Palace as a supreme example of Gothic Revival and the work of Sir Charles Barry and A.W. Pugin. The surviving buildings of the medieval Palace of Westminster, notably the internationally important Westminster Hall and the Jewel Tower.

- Westminster Abbey as a major ecclesiastical monument of great antiquity and beauty; the place of coronation and shrine of British monarchs since the 11th century and the place where the nation’s important statesmen, poets and other individuals are commemorated.

- St Margaret’s Church, the only medieval parish church to survive in the City of Westminster, sometime considered as the church of the House of Commons.

¹ United Nations Educational, Scientific and Cultural Organisation
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<th><strong>9.2 DRAFT ATTRIBUTES OF OUTSTANDING UNIVERSAL VALUE OF WESTMINSTER WORLD HERITAGE SITE</strong></th>
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This initial draft list is included as a starting point for consultation. We are seeking your views on what should be included in the list and which elements contribute to the site’s international significance.
The setting of the World Heritage Site is the area around it in which change or development is capable of having an impact on its Outstanding Universal Value. The boundary of the site itself is very tightly drawn but a larger area of the immediate surroundings of the World Heritage Site is described in the World Heritage Site Management Plan. This includes adjoining spaces, approaches and river views and the Southbank in London Borough of Lambeth. However, the World Heritage Site’s prominence and riverside location means that the setting is much more extensive and development at a considerable distance may be within its setting and affect its OUV.
NEW POLICY CM25.5: WESTMINSTER WORLD HERITAGE SITE (THE PALACE OF WESTMINSTER AND WESTMINSTER ABBEY INCLUDING ST MARGARET’S CHURCH)

Development within or affecting the Westminster World Heritage Site will protect and enhance:

1. its Outstanding Universal Value;
2. the immediate and wider setting; and
3. important views across, out of, and towards the site, including views originating in other boroughs.

Westminster World Heritage Site is of the highest level of significance and should therefore be afforded the highest levels of protection.

Outstanding Universal Value (OUV)

Any development proposals within or affecting the World Heritage Site should be supported by information which explains their impact on OUV, including authenticity and integrity and proposals should also take opportunities to enhance appreciation of OUV wherever possible. A statement of Outstanding Universal Value has been prepared which summarises the reasons for Westminster’s inscription and what makes its significant. Following consultation, the draft list of attributes set out on p25 will be developed further and a version included in the City Plan.

Immediate and Wider Setting

Opportunities to enhance the setting of the site and appreciation of OUV should be taken wherever possible. The World Heritage Site management plan and conservation area audits for the Palace of Westminster and Westminster Abbey Conservation Area and adjoining areas provide guidance on the site and its immediate setting. Enhancements to the immediate setting, including improvements to public realm and visitor experience around the site, will be encouraged and initiated where possible. The World Heritage Site’s prominence and riverside location means that development at a considerable distance may be within its wider setting and this is therefore harder to define. This may be within and outside the City of Westminster and on both sides of the river. UNESCO recommendations have asked for protection of the site’s setting to be improved and the council will work with adjoining boroughs to define and better protect the wider setting of the site. A large number of strategic and local views originating both within and outside Westminster have the World Heritage Site as their focus. A framework for understanding setting is set out in the 2011 English Heritage Guidance on setting and the draft Historic Environment Good Practice Guidance on setting (2014).

Views

The striking silhouette and iconic views of the Palace of Westminster and Westminster Abbey World Heritage Site set against a backdrop of clear sky contributes significantly to an understanding of its Outstanding Universal Value. The London Plan and London View Management Framework (LVMF) protect the silhouette of the Palace of Westminster and identify a number of views towards the World Heritage Site. Local views of the World Heritage Site are identified in the conservation area audits for the Palace of Westminster and Westminster Abbey conservation areas and the adjoining areas including Smith Square, Vincent Square, Whitehall, Trafalgar Square, Vincent square and Broadway and Christchurch Gardens. The draft Lambeth Local Plan also identifies a number of local views from Lambeth, which have the World Heritage Site as their focus.
10.1 INSIGHTS: PROTECTING AND ENHANCING VIEWS

Views of buildings and landscapes contribute significantly to understanding Westminster’s unique heritage and add to the character and quality of the City’s townscape. Westminster is crossed by a number of protected views which are identified in the London Plan but there are also many other important local views, which make a significant contribution to Westminster’s distinctive character areas.

These locally identified views may be of particular landmarks or listed buildings or of distinctive groupings of buildings and historic skylines. These may be part of historic layouts or designed landscapes or may have emerged or been created through gradual evolution of the townscape. These contribute to the legibility and distinctiveness of local areas.

Westminster’s exceptional historic environment and river setting means that some local views are considered to be of particular ‘metropolitan’ importance. These are views of some of the City’s most significant landmarks and townscape and may have impacts beyond Westminster boundaries. These were originally identified through our draft Metropolitan Views SPD, which explains why they are significant and are listed on p33. These views will be included in the draft City Plan. Other local views which contribute to distinctive character areas but are not of borough-wide importance are identified in conservation area audits.

The London Plan states that the principles of its Policy 7.12 can also be used for the assessment and management of local views. Emerging policy seeks to maintain and, where appropriate, enhance the overall character and qualities of the Westminster and central London skyline as the city continues to grow and develop into the future. The townscape of Westminster is not static and change and development can also offer opportunities to create or open up new views of the City. Lists of significant views will therefore be kept under review, in consultation with local stakeholders.

“Views play an important part in shaping our appreciation and understanding of England’s historic environment. … The existence of such views, often containing well-known landmarks and cherished landscapes, enriches our daily life, attracts visitors and helps our communities prosper.”

Seeing the History in the View (2011) English Heritage
Westminster is a predominantly low to mid-rise City, with the overwhelming majority of buildings, even in the commercial areas, being less than six storeys high. This means that even buildings of a modest height may be significantly higher than their surroundings and, as such, can be considered to be tall buildings.

The council’s policy approach to tall buildings over the past fourteen years has been informed by a High Buildings Study which was undertaken in 2000¹. It concluded the most appropriate location for tall buildings is Paddington Opportunity Area but identified very limited scope for new tall buildings in the rest of Westminster, due to the settled character of the townscape and significant concentration of heritage assets.

The London Plan (Policy 7.7) requires boroughs to identify areas which are appropriate, inappropriate or sensitive to tall buildings in their local plans. It makes clear that tall buildings should be resisted in areas sensitive to their impacts and that high density does not need to imply high rise².

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¹ EDAW City of Westminster High Buildings Study 2000
² London Plan (2011), paragraph 7.25.
10.3 INSIGHTS TALL BUILDINGS

The adopted Westminster City Plan: Strategic Policies includes spatial analysis of where tall buildings in Westminster may be appropriate and directs these to Paddington and Victoria Opportunity Areas. It identifies only one location in Paddington as suitable for a very tall landmark building and a building has been approved on this site (1 Merchant Square). However, it recognises that parts of the City such as Victoria and Paddington are characterised by some taller and large scale buildings and there may be potential for further large-scale development in these areas. Detailed guidance on building heights in the opportunity areas has been set out in planning briefs.

Outside the opportunity areas, appropriate locations for tall buildings are more limited due to the sensitivity of historic and lower-scale residential environments. In considering the impact of and acceptability of taller buildings elsewhere, including works of extension and re-development of existing tall buildings, the council will take into account issues such as the impact on heritage assets and protected views, open spaces, the character and amenity of the surrounding buildings and microclimate, biodiversity, overshadowing and residential amenity.

We have commissioned consultants who are working on a tall buildings study to look at this issue and our policy approach further. This will inform our next iterations of policy on tall and higher buildings (see policy for definition) and this will consider whether there are further opportunities for tall or higher buildings.

Where it has been established that the principle of a tall or higher building is acceptable, the visibility and impact of such buildings over a wide distance means that the council will expect exceptional design standards as well as detailed consideration of environmental performance and impacts on microclimate, the surrounding public realm and adjoining occupiers. A new policy sets out criteria for how we will consider applications for these buildings in Westminster.
Recent years have also seen an increase in proposals for tall buildings across London. In the right places, these make a positive contribution to the London skyline. However, the size and prominence of such buildings means that they can have an impact on adjoining boroughs and may affect views from and across Westminster.

The London Plan makes clear that character does not recognise borough boundaries and the NPPF requires local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in Local Plans.

Emerging policy also recognises the importance of protecting views from adjoining boroughs into Westminster, as well as views from Westminster to adjoining boroughs. We will work with adjoining boroughs and other partners to ensure the London-wide impacts of development on protected views are understood and managed constructively, also considering the impacts of proposals within Westminster on locally designated views from other boroughs.

1 London Plan (2011) paragraph 7
2 NPPF Paragraph 178
**10.5 RECOMMENDATIONS VIEWS**

**POLICY S26 VIEWS**

The 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.

The council will work with neighbouring boroughs to ensure impacts of large-scale development on important views to and from Westminster are understood. Where important views are adversely affected by large scale development in other boroughs, the council will raise formal objections or make other representations, where appropriate.

**Westminster is not generally appropriate for tall buildings.**

Development which affects identified strategic and local views will protect elements which contribute to their composition and significance and will consider the potential for view enhancement. It will not:

1. impinge on or detract from important views, groups of buildings or skylines;
2. appear too close or high in relation to a landmark, significant feature or building; or
3. appear behind, and mar the silhouette of a specific landmark, significant feature or building.

* See list overleaf

**Identified Views**

Strategic views are identified in the London Plan. The LVMF explains why they are significant and provides advice on their protection. Local views (including those of metropolitan importance) may include views of:

- listed or other distinctive buildings,
- landmark buildings,
- important groups of buildings and townscape gaps,
- monuments and statues,
- parks, gardens and squares,
- the Grand Union and Regents Canals,
- the River Thames,
- the Westminster World Heritage Site.

The draft metropolitan views SPD provides analysis of local views of metropolitan importance and what makes them significant. Other local views are identified in conservation area audits. Local views of significance may also be identified in planning briefs, in consultation with local communities and other stakeholders or as a result of the development management process and may include views identified by adjoining boroughs into Westminster.

Where proposals affect significant views, analysis required will be proportionate to the significance of the view. Lists of important views will be kept under review.

The council will work with adjoining boroughs and other partners to ensure the impact of development on protected views is understood and appropriately managed. In some circumstances, we may object to development in adjoining boroughs where this has a significant impact on views from or across Westminster.

Consider the potential for view enhancement The planning system can take a pro-active role in repairing past damaging additions. Improvements to significant views will be encouraged.

Some buildings and other heritage assets, such as the Palace of Westminster and the Albert Memorial, have a very distinctive silhouette which, if development was to appear behind, would significantly detract from the ability to appreciate them.

This text has been moved to the tall buildings policy (page 34).
10.6 Strategic Views and Local views of Metropolitan Importance

LOCAL VIEWS OF METROPOLITAN IMPORTANCE
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
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

LONDON PLAN VIEWS AFFECTING WESTMINSTER
London Panoramas
View 2 From Parliament Hill to the Palace of Westminster
View 4 From Primrose Hill to the Palace of Westminster
Linear Views
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
River Prospects
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View 17B Waterloo Bridge
Footbridges
View 16 Westminster Bridge
View 17 Golden Jubilee/Hungerford
View 18 Westminster Bridge
View 19 Lambeth Bridge
View 21 Victoria Embankment between Westminster and Lambeth 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
Townscape Views
View 23 Bridge over the Serpentine, Hyde Park to Westminster
View 26 St James’s Park Bridge to Horse Guards Road
View 27 Parliament Square to the Palace of Westminster
**NEW POLICY SX TALL BUILDINGS**

Westminster is not generally appropriate for tall buildings. Higher buildings will be permitted in appropriate locations subject to the criteria below. Tall and higher buildings, including redevelopment of or extensions to such buildings, will not have a harmful impact on:

1. listed buildings, conservation areas and other heritage assets including the Westminster World Heritage Site or their settings;
2. significant views, both strategic and local;
3. the settings of open spaces, the Grand Union and Regent’s Canal or the River Thames;
4. adjacent buildings by overshadowing;
5. the microclimate of the surrounding area; or
6. the character and amenity of the surrounding buildings.

**Adopted City Plan Strategic Policy.** The strategic text on tall buildings has been moved from the views policy to the tall buildings policy below. Policies for the opportunity areas are being reviewed in the Spatial Strategy booklet. Detailed wording will be considered further once the tall buildings evidence-base study is complete.

**Key Question**

We are reviewing and updating our High Buildings Study dating from 2000 to inform our policy direction for tall and higher buildings. We welcome your views on the appropriateness of different parts of Westminster for these buildings. This includes tall buildings such as the one approved for 1 Merchant Square, and buildings that are higher than their surroundings.

Within Westminster, the low scale of the townscape means that even buildings of a modest height are likely to be higher than their surroundings. The High Buildings Study, published in 2000, notes that the majority of the City is characterised by buildings of 6 to 8 storeys. It also notes that tall buildings above 25-30 storeys can have a significant impact upon distant views and, as such, are unlikely to be appropriate in Westminster. For the purposes of this policy we have separately defined tall and higher buildings:

**Tall Buildings** are those buildings above 25-30 storeys. The adopted City Plan identifies only one location where a tall landmark building would be appropriate.

**Higher Buildings** are other buildings that are higher than their surroundings.

The council is, however, committed to allowing appropriate sustainable development and optimising development potential, wherever possible. Significant new floorspace is needed to meet the needs of residents and businesses seeking a Westminster location and in some locations, buildings which are higher than their surroundings will be an appropriate solution to deliver such floorspace.

The policy therefore sets out proposed criteria which we will use in considering the impact, and acceptability of higher buildings, including works of extension and re-development of existing tall or high buildings. These will be used on a case by case basis to determine whether higher buildings are appropriate in particular locations. The extent of heritage assets and low scale of the townscape means that, in much of Westminster, densification will be a more appropriate response than a tall or high building.

The emerging Tall Buildings Study will examine these issues in more detail and further consultation will be undertaken once the new study is completed to ensure an appropriate policy approach to this issue.
NEW POLICY SX TALL BUILDINGS CONTINUED

Where the principle of a tall or higher building is considered acceptable then it will be of the highest sustainable architectural and urban design quality and it will:
1. enhance the skyline of Central London by its profile, proportions and facing materials;
2. relate to the existing capacity of the local public transport and highway networks;
3. provide a favourable mix of land use which would facilitate shorter journeys to work, energy conservation and support other sustainability objectives;
4. define and provide a landmark at points of significant urban activity and accord with the scale and character of the area and existing open space;
5. create high quality townscape at ground level, enhancing accessibility and local pedestrian movement and providing open space and active frontages at street level;
6. provide high quality landscaping treatment in any associated public areas;
7. minimise the effects of overshadowing and overlooking, especially within predominantly residential areas;
8. avoid the effects of wind turbulence and other adverse microclimatic or air quality impact;
9. create publically accessible viewing areas at the top of the building; and
10. ensure that on-site vehicle parking provision and movement is restricted to underground areas.

**Overshadowing** This can be especially harmful to residential environments and amenity spaces and can also adversely impact on biodiversity and disrupt the functioning of renewable energy equipment.

**Townscape at ground level.** It is not only the impact on the streetscape and local views, but also how the building functionally relates to the street. Successful tall buildings are those that create meaningful public realm, interacting positively with the surrounding buildings and spaces. This includes contributions to permeability and connectivity, defining edges that reinforce existing building lines and give a coherent form to open space, and providing active ground floor frontages and a stimulating and inclusive public realm.

Further guidance can be found in the English Heritage/CABE Guidance on Tall Buildings (2007).
This booklet is part of our informal consultation for developing the statutory policies in Westminster’s City Plan. It builds on previous consultation on the City Management Plan in 2011. This booklet only includes recommendations on the proposed policy. However, Westminster’s City Plan will incorporate supporting text, including:

• Introductory text, setting out the background to the topic.
• Policy application: guidance as to how the policy will be applied, including details of how things will be measured or calculated etc.
• Reasoned justification: this is an explanation required by law to accompany a policy, setting out why a policy is applied.
• Glossary definitions: the statutory definitions used for terms that are included in the policies.

If you have any questions or wish to discuss the issues raised in this booklet, please telephone 020 7641 2503.

To comment on this booklet, please email: planningpolicy@westminster.gov.uk or write to us at:

City Planning
11th Floor
Westminster City Hall
64 Victoria Street
London SW1E 6QP

Please submit your comments by 31.03.2015.

Your comments will form part of the statutory record of consultation and will be made available on our website and to the public. Your contact details will not be made available, but we will use them to stay in touch with you about future policy development. If you do not want us to stay in touch, please let us know in your response.

Reading List


Communities and Local Government (2013) National Planning Practice Guidance

DCMS (2010) Principles for the Selection of Listed Buildings

EDAW/ Westminster City Council (2000) High Buildings Study


English Heritage (2008) Seeing the History in the View

GLA (2012) London View Management Framework

SPAB (2012) Responsible Retrofit of Traditional Buildings

Westminster City Council Conservation Area Audits (various dates)

Westminster City Council (2007) Draft Metropolitan Views Supplementary Planning Document

Westminster City Council (2011) Retrofitting Historic Buildings

Westminster City Council Westminster Way