

## Westminster City Council: Consultation: Building Height: March 2017

### Response by the London Forum of Amenity and Civic Societies

#### Who are we?

The London Forum of Amenity and Civic Societies (London Forum) represents some 120 civic and amenity societies across Greater London, including many of the major civic societies both in and neighbouring the City of Westminster.

These include:

- Knightsbridge Association
- Marylebone Association
- Paddington RACT
- Paddington Waterways and Maida Vale Society
- Seven Dials Trust
- Soho Society
- South East Bayswater Residents' Association
- St John's Wood Society
- St Marylebone Society
- Thorney Island Society
- Westminster Society
- Brompton Association
- Chelsea Society
- Kensington Society

#### What is our interest in tall buildings?

The London Forum has been actively involved in responding to Government changes to planning and all the Mayor of London's strategies including the London Plan, where we have taken a leading role in every Examination of the London Plan.

We have taken a particular interest in the London Plan policies for tall buildings and were, like Westminster, one of the first signatories to the Skyline Campaign. We have sought and are seeking changes to London plan Policy 7.7: Location and Design of Tall and Large Buildings, specifically to:

- Delete the last sentence of the Strategic policy (A) which proposes that tall buildings "should not have an unacceptably harmful impact on their surroundings". This sets too low a test for new tall buildings and **should be replaced by a positive requirement that they "should make a positive contribution to a coherent public realm, streetscape and London's skyline"**

In "A City for All Londoners", the Mayor has already signaled his concern that tall buildings:

- must add value to existing communities;
- should respect the distinct character of different parts of the city;
- must make a positive contribution to streetscape and skyline; and

- careful account must be taken of the way the building relates to activities at ground level.

These factors, which are in any case material considerations, could be given more weight by the Mayor in his assessment of applications for tall buildings, regardless of whether Policy 7.7 is revised in the new London Plan. London Plan Policy 7.4 and the Mayor's Context and Character SPG and Policy 7.5 Public Realm are also relevant. Indeed, they will in due course become part of the development plan in Westminster.

The approach taken by the Mayor of London, which may well be reflected in the forthcoming London Plan, puts more emphasis on the acceptability of tall buildings on local communities, the local streetscape and on London's skyline.

**London Forum supports the direction of travel of the Mayor of London to re-evaluate the need for and contribution of tall buildings in London.**

## **Back story**

### **Tall Buildings in Westminster**

Many of the tall buildings in or directly impacting Westminster, are the result or decisions which pre-date creation of the City of Westminster in 1965, such as City Hall, and/or were the result of decisions of Government ministers on call-in, appeal or due to Government developments (such as the Hilton Hotel, Knightsbridge Barracks, Queen Anne's Mansions). Since the City of Westminster became the planning authority, it has had a proud record of managing and defending the townscape, views and skyline of Westminster, through its well-designed policies and its consistent approach to decision making. To date the "exceptions", Paddington and, for the most part, Victoria, have been carefully managed, and the removal of eye-sores, such as the towers in Marsham Street, have been sensitively redeveloped to reduce or even eliminate their impact.

**London Forum considers that Westminster's current policy has been carefully crafted and firmly applied over the last 50 years and would oppose any significant change that would adversely affect the townscape and skyline of the City. We were very concerned by the scale and height of the recent permission at Paddington, as a departure from the City Council's record of managing its development pressures.**

### **Identifying areas suitable for tall buildings:**

The Greater London Development Plan (1976), through its Urban Landscape Diagram, established a sieving method that classified areas governed by the High Buildings Policy. This identified:

- Category (i): areas in which high buildings are inappropriate
- Category (ii): areas which are particularly sensitive to the impact of high buildings; and
- Category (iii): areas in which a more flexible or more positive approach is possible.

The whole of the City of Westminster, except the western part of Queen's Park, was covered by Categories (i) and (ii), albeit that the areas were shown diagrammatically. The intention was that each London Borough would produce a more detailed analysis in developing their own policies. Very few London Boroughs, even today have done this – Westminster is one of the few exceptions.

In successive plans, the City of Westminster developed a more fine-grained policy taking into consideration the impact that tall buildings might have on listed buildings and conservation areas. The EDAW High Buildings Study (2000) concluded that the most appropriate location for tall buildings was Paddington Opportunity Area, with very limited scope for tall buildings in the rest of Westminster.

This approach was endorsed by the CABE/English Heritage advice (2007) which set out a more developed methodology for identifying locations where tall buildings would and would not be appropriate and recommended that local planning authorities should, as a matter of good practice, carry out a detailed urban design study. This guidance was updated by Design Council/English Heritage in 2015, in Historic England's Historic England Advice Note 4: Tall Buildings: Historic England Advice Note 4: Tall Buildings.

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 rise. In addition, the London Plan has identified Paddington and Victoria Opportunity Areas as locations for intensification.

### **London Forum strongly supports this approach**

#### **Identifying views**

Key strategic London-wide views were introduced by the Secretary of State for the Environment as Annex A to RPG3: Regional Planning Guidance to provide Supplementary Guidance for London on the Protection of Strategic Views in 1991. This identified 9 strategic views, 3 of which directly affected the City of Westminster. In May 1996, Government Office for London published a revised RPG3: Strategic Guidance for London Planning Authorities, which, in addition to confirming the strategic views, advocated (para 8.19) that London Boroughs "should consider the need to protect important local views". Again, Westminster was the leader in adopting this approach in the City Plan.

Since 2000, strategic planning for views has been covered in the London Plan – the 2015 London Plan covers this in Policy 7.11: London Views Management Framework and Policy 7.12 Implementing the London View Management Framework, which in addition to the 27 strategic views, proposes that, in preparing their Local Plan, Boroughs should use the principles of this policy for the designation and management of local views". Westminster again pioneered the adoption of Local Views of Metropolitan Importance – few boroughs have done this.

Unlike other stretches of the Thames there is no Thames Landscape Strategy covering Westminster's waterfront, but the London Plan's Thames Policy Area is reflected in the City Plan, as an area where developments will need to demonstrate that they have particular reference to their riverside location and architectural references, including long views of the riverside.

**London Forum strongly supports this approach and has proposed that there should be more strategic views, especially along and across the Thames upstream of Lambeth Bridge and that boroughs should designate local views deserving protection.**

**We strongly support the retention of Local Views of Metropolitan Importance in any revised policy.**

### **Westminster's current policy**

The City Plan Strategic Policies S25: Heritage and S26: Views covers these issues. Proposals to review these policies were set out in "Heritage, Views and Tall Buildings" Booklet No. 15, Westminster Plan Revision; January 2015. London Forum supports most of the changes set out in that document.

### **Consultation on Building Height**

The current consultation document makes the case for planning for more space for additional jobs and homes - securing the right kind of growth in the right place. However, London Forum is concerned that this should not damage Westminster's carefully managed townscape and skyline.

Over the last 50 years, growth in floorspace has occurred through achieving much higher net:gross floorspace ratios plus some expansion through both refurbishment and redevelopment, such as in the Victoria area, and, in a few areas, significant growth through much larger buildings, such as Paddington, but where the impact on views, such as from Hyde Park, have proved extremely contentious.

Outside these Areas of Intensification, significant increases in floorspace have been achieved through sensitive refurbishments, such as on the Crown Estate where recent schemes have produced a 60% increase in usable floorspace, within much the same building bulk. The falling floorspace per worker means that these buildings (and all existing office buildings) can "accommodate" more workers for the same floorspace.

One of the biggest changes in the last 5 years has been the change of use through both conversion but more particularly through major redevelopments from offices to housing, such as in the Victoria/Victoria Street area. This area was the most appropriate area for offices, yet the redevelopments and conversions have been disproportionately for housing. This is a one-way trip. The Council has reduced its capability of providing or maintaining space for economic activity and is now looking for more office space, especially around transport hubs.

**London Forum supports increased density around transport hubs, but not tall buildings. These areas should be primarily for employment space. Getting the right development in the right place means putting high trip-generating uses, like offices, in these locations. They should not be displaced by residential uses, which may well prove to be an irreversible step due to very long leases.**

**The planning history of Victoria Street is a salutary lesson, where the Victorian mansion blocks were redeveloped for offices between 1960 and the late 1980s, but most of the recent conversions, refurbishments and redevelopments have been for residential use.**

**Higher density does not necessarily mean high rise.**

Whilst there may be a need for more offices and housing, **London Forum does not agree that this necessarily means building any higher than at present.** Higher density does not necessarily mean high rise. For example, the three towers in Marsham Street, which dominated the Westminster area, were redeveloped for a set of buildings that cannot be seen from anywhere, yet they have more office floorspace plus housing. Rather than build more tall buildings, some of the existing tall buildings may need to be redeveloped with less obtrusive ones, such as Knightsbridge Barracks.

**What is the scope for tall buildings?**

Many of the buildings built from 1960s-1980s and the potential major development sites have already been redeveloped, such as most of Victoria Street, Marsham Street, the sites south of Victoria Station. The scope would be limited regardless of whether it would be desirable.

Most of the residential areas and conservation areas would be inappropriate – Pimlico, Belgravia, Bayswater, Little Venice, Maida Vale, Queen's Park and St John's Wood. The West End – St James, Mayfair, Soho, Covent Garden, Fitzrovia and Marylebone – are all unsuitable.

**London Forum strongly objects to the Council proposals to encourage further tall buildings in Westminster**

## **SUMMARY**

### **Approach to the acceptability and location of tall buildings**

London Forum considers that Westminster's current policy has been carefully crafted and firmly applied over the last 50 years and would oppose any significant change that would adversely affect the townscape and skyline of the City. We were very concerned by the scale and height of the recent permission at Paddington, as a departure from the City Council's record of managing its development pressures.

London Forum **strongly supports** this approach, advocated in successive advice and in the London Plan, to identify areas where tall buildings are inappropriate and

those sensitive to tall buildings, of which the City of Westminster has been a leading exponent. London Forum **supports** the City Council's approach to date, but is concerned that the current proposals could be damaging to Westminster's neighbourhoods, its heritage assets and to London's skyline.

## **Views**

London Forum **strongly supports** this approach and has proposed that there should be more strategic and "metropolitan" views, especially along and across the Thames upstream of Lambeth Bridge, and that boroughs should, like Westminster, designate local views deserving protection. We **strongly support** the retention of Local Views of Metropolitan Importance in any revised policy.

## **Increased density**

London Forum **supports** increased density around transport hubs, but not tall buildings. These areas should be primarily for employment space. Getting the right development in the right place means putting high trip-generating uses, like offices, in these locations. They should not be displaced by residential uses, which may well prove to be an irreversible step due to very long leases.

The planning history of Victoria Street is a salutary lesson, where the Victorian mansion blocks were redeveloped for offices between 1960 and the late 1980s, but most of the conversions, refurbishments and redevelopments have been for residential use.

## **Tall buildings**

Whilst there may be a need for more offices and housing, London Forum **does not agree** that this necessarily means building higher than at present. Higher density does not necessarily mean high rise.

London Forum **strongly objects** to the Council proposals to encourage further tall buildings in Westminster

Michael Bach  
Chairman: Planning, Environment and Transport Committee  
London Forum of Amenity and Civic Societies

29 May 2017