

The Mayor of London  
Greater London Authority  
(London View Management Framework)  
City Hall  
More London  
The Queen's Walk  
London  
SE1 2AA

29 September 2009

Dear Mayor Johnson,

**Revised Supplementary Planning Guidance – London View Management Framework  
Westminster Property Association Consultation Response**

The Westminster Property Association (WPA) welcomes the opportunity to respond to the draft revised London View Management Framework.

The WPA represent the largest developers, land and property owners within the City of Westminster and therefore have a very keen interest upon the implications of the revised LVMF upon development capacity within the City of Westminster.

The Association recognises the need to maintain or, where possible, enhance views of London's strategically important landmarks. However, this needs to be very carefully balanced against other strategic objectives for the Central Activities Zone (CAZ), as defined within the London Plan, and particularly accommodating economic and population growth.

The Association is concerned that the additional constraints imposed by the revised draft LVMF will impact upon development potential, capacity and therefore, the growth of the central London economy.

The WPA fully endorse the representations made by London First in relation to the implications of the revised draft LVMF and suggested revisions. There are, however, a number of specific points which WPA wish to fully emphasise.

**Consistency with Mayoral Strategies**

WPA does not consider that the revised LVMF is consistent with the Mayor's other adopted and emerging strategies and particularly the London Plan and economic development strategy which explicitly encourage accommodating employment and housing growth, particularly in areas of good transport accessibility.

The two most important areas for accommodating London's economic growth are Opportunity Areas and the CAZ. Limiting growth in these areas will affect London's ability to grow in conflict with the Mayor's strategic objectives.

WPA has not seen evidence that the 2007 LVMF does not provide sufficient protection or any assessment of the implications of the revised draft LVMF upon development capacity.

## **CAZ and Opportunity Areas**

The proposed revisions to the LVMF would, in our view, constrain development capacity within the defined CAZ (most of the City of Westminster is within the CAZ) and Opportunity Areas in Westminster.

The constraints would be as a specific result of:

- View 2A.2 from Parliament Hill to the Houses of Parliament restricting development at the eastern end of Oxford Street including part of the Tottenham Court Road Opportunity Area;
- The protected silhouette behind the Houses of Parliament World Heritage Site which will affect development potential in the southern part of the City;
- Revised river prospects policy again affecting the southern extremes of the City;
- Widening of protected views to St Paul's Cathedral affecting development capacity in Victoria.

Whilst WPA has not accurately mapped the areas in Westminster affected by the revisions to the LVMF, it is evident from initial assessment that;

- i) the area affected by the changes will increase materially; and
- ii) that in Westminster all of these affected areas will be within the CAZ or Opportunity Areas.

WPA is concerned that these constraints will adversely affect development potential within the CAZ and Opportunity Areas, defined areas where growth, densification and optimising development capacity, is actively encouraged by London Plan policy elsewhere. This will compound marginal commercial viability and the extent of planning obligations, including those towards Crossrail.

## **Terminology**

The language, terminology and key tests for LVMF as drafted are confusing, ambiguous and inconsistent.

The language (particularly in chapter 5) should be re-drafted to reflect the wording within policy 4B.18 of the London Plan, ie: "to preserve or enhance the ability to recognise and appreciate the landmark buildings". To provide clarity it is essential that the language is consistent with the wording of the London Plan.

## **Background and Lateral Assessment Areas**

WPA understand from the GLA that it is the Mayor's intention that the purpose of the background and lateral assessment areas (BAA/LAA) is to trigger consultation as opposed to a presumption that development should be precluded above the threshold plane. This needs to be explicitly clarified within the LVMF as Local Authorities frequently do not differentiate sufficiently between consultation areas and viewing corridors.

WPA endorse the proposed terminology and assessment methodology contained within the London First representations.

WPA also recommend that the Mayor invests in a publically accessible web based tool to enable all stakeholders involved in the assessment process to fully comprehend the implications of the protected views.

### **Other Considerations**

WPA appreciate the aspiration to see existing buildings which breach the development planes in viewing corridors, demolished and replaced with lower buildings. It is unrealistic however, to assume that taller buildings will be replaced by lower buildings via redevelopment proposals. Instead buildings will be retained and refurbished thereby discouraging redevelopment.

WPA also consider that a more qualitative approach be taken to buildings within the shadow of existing buildings in viewing corridors and that judgements are made upon a case by case basis of the likelihood of a building which breaches the development plane being redeveloped.

WPA does not consider it appropriate that Royal Parks and other bodies should be afforded the same status as statutory consultees.

We look forward to the outcome of the consultation review, trust that our comments will be given due consideration and welcome the opportunity for further dialogue.

Yours sincerely



**Robert Noel**  
Chairman WPA

Cc P Houston - Westminster Property Association  
H Bullock - Westminster Property Association