

Cllr Daniel Astaire
Cabinet Member for Planning and Public Realm
Westminster City Council
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

20th May 2017

Dear Cllr Astaire,

Building Height: Getting the right kind of growth in Westminster

I write on behalf of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to the Gardens Trust (the GT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. Inclusion of a site in the HE Register is a material consideration in determining a planning application. The LPGT is the gardens trust for Greater London and makes observations on behalf of the GT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see www.londongardenonline.org.uk) and/or when included in the Greater London Historic Assets Register (HAR). In conjunction with the compilation of the London Inventory, LPGT members have in the past held meetings with Westminster staff on producing a List of Parks and Gardens of Local Interest.

We thank you for including us in your consultation and acknowledge that London, and in particular Westminster faces increased development pressures through rising population and economic demands. We found your meeting on 11th May with the amenity groups helpful in clarifying the different amenity group interests and we are aware that you held a very different meeting with the large estates and major developers which gave you a different view.

Whilst the consultation refers to Conservation Areas and protected World Heritage views the Trust does not believe sufficient consideration has been given to the importance of designated designed landscapes within Westminster. Therefore, the Trust has set out its concerns below.

1. Importance of Designated Landscapes

- Designated landscapes are protected by the NPPF and taller buildings risk substantial harm through overshadowing and loss of historic integrity.
- Publicly accessible designated landscapes are of the greatest importance for amenity value.

As you will see from the London Inventory, there are over 160 important historic gardens including Victoria Embankment Gardens, churchyards, greens, residential gardens and other important squares. These sites are added to the Historic Environment Register for Greater London maintained by Historic England as Historic Assets. Of these there are 23 parks and gardens in Westminster included in the Historic England Register. All the inner Royal Parks (Regent's, Hyde, Green and St

James's Park) are wholly or partly in Westminster and all are registered of special historic interest at grade I – considered of the highest importance to the heritage and cultural value of the United Kingdom. The [National Planning Policy Framework \(NPPF\) \(4\)](#) explains that the conservation of designated heritage assets should be an objective of all sustainable development. Substantial [harm](#) to or total loss of a Grade II registered park or garden should be exceptional and for a Grade II* or I registered park or garden such loss or harm should be wholly exceptional. The ownership, and access to the public are immaterial to this consideration. However, the Trust believes that those green spaces that are open to the public should gain additional value as they also provide vital amenity space, essential for wellbeing and sustainable development.

The River Thames is London's largest and most historic open space and has special policies for its protection, but since the most damaging developments are visible only from the opposite bank and in a different borough, riverside developments (especially recent ones) are frequently appalling. LPGT considers that its brief includes commentary on proposals affecting the River Thames, and also World Heritage Sites.

LPGT is not opposed to higher and tall buildings in principle. It accepts the need for growth and for intensification of development to maintain London's place as a major city. However, London, including Westminster, is historically of low to medium density, with generous green open spaces and buildings frequently of not more than six storeys. Significantly higher/taller buildings can therefore have a disproportionately damaging effect on green open spaces which, as we know, are important to our physical and mental welfare.

2. Royal Parks

- Taller buildings at the perimeter of larger green spaces, particularly the Royal Parks is to be avoided – these detract from the sense of countryside within the city.
- Where tall buildings do protrude above the skyline these should be incidental and of significant architectural merit relevant to a public landmark rather than residential or office development.

The Royal Parks are to a great extent "trapped countryside", the surrounding trees seen against the sky rather than against a backdrop of built development. The landscape architect Hal Moggridge developed for the Royal Parks a series of contour maps to try to protect their skylines. Expressed simply, the farther away from the protected asset you build the taller you can go.

Buildings need to be well designed whatever their size, but the bigger and more conspicuous they are, the more important it is that they should be well considered. The Park Lane Hilton, Knightsbridge Barracks and Lancaster Gate Hotel (and others) all damage Hyde Park and detract from its visual amenities. They are not attractive buildings, but it is doubtful that any large commercial buildings in those locations could enhance the scene.

The suggestion of increased building heights along Park Lane is especially worrying since Park Lane defines the east side of Hyde Park (which is very different in character from New York's Central Park). At Grosvenor House Hotel on Park Lane, for instance, Lutyens broke up the skyline with a series of pavilions that appear above the treetops, and Vincent Harris adopted a similar motif at the old War Office

in Whitehall, which forms a backdrop to the view from the bridge across the lake in St James's Park.

The occasional architectural incident appearing above the treeline around parks (church spire, minaret, campanile, Imperial Institute Tower, belvedere) can be fine, but a wall of buildings is very damaging.

Each application for a significantly higher building needs to be examined most carefully in the widest context, and if the likely result is damage to views into and out of familiar and valued parks, gardens and other green open spaces that is sufficient reason to refuse consent.

3. Locally important views, overshadowing and horticultural

- Views from within parks and gardens looking out should be designated and tall buildings should avoid interrupting the architectural feel (for example a Georgian Square).

Other parks, gardens and designed landscapes should also be protected, and we would urge Westminster to consider locally important views from within parks and squares as well as the Strategic World Heritage Views. In particular we believe a number of green spaces are in jeopardy or will be further compromised by increased heights in the nominated development areas.

These gardens, such as Ebury Street Garden and Lower Grosvenor Garden area already significantly negatively impacted by overshadowing and channelling of traffic around them. This makes horticultural aspirations, which contribute, to well-being harder to achieve. Moreover, maintenance and management of overshadowed, intensely used and polluted areas to deliver a positive impact is more costly in the longer term.

LPGT recommends that any future plan for taller buildings takes into account the views from green spaces looking out, not just those views into such spaces.

4. New public realm

- Opportunities for new public realm should be welcomed provided they encourage horticultural excellence and as much green space as possible.
- Public green space is of highest value at ground level.

With intensification of development it is vital not only to seek architectural excellence of buildings but also to push for new public spaces as there are limits to the intensification that is viable within existing green spaces.

Living walls and roofs are clearly to be commended but do not offer the same value in terms of environmental impact (to mitigate against sudden flooding events and improve air quality) as those designed at ground level which maximise green space over hard landscaping. New public realm involving well-designed horticultural interest provides the greatest public amenity value for play and relaxation that is essential to mental and physical health and well-being for existing residents and new users. The GLA is working on the concept of Natural Capital Value and the cost-benefit of greenspaces set against the long term savings to the social and health costs of failing to provide this needs to be considered.

The Trust would be happy to discuss any of these points with you in further detail should this be helpful.

Yours Sincerely,

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Director
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Cc Margie Hoffnung, Conservation Officer, the Gardens Trust