

**London View Management Framework SPG
Statement of Consultation**

Respondent	LVMF Ref	Comment	GLA Response	Amendments
A Quinn	27A (further consultation)	It is short-sighted to effectively ban any new development in Waterloo. There is nothing wrong with a modern building being seen in the distance. Parliament Square is much more ruined by all the street clutter and traffic.	It is important than there is a balance between the need to protect World Heritage Sites, which are of international significance, with the need to allow the city to grow and change. This visual guidance responds to both those requirements.	No Change
Amiel Ziv	27A (further consultation)	Oppose to using Viewing Location 27A in judging views of the Palace. This location has been chosen to impose the maximum restriction of development.	The viewing location chosen is a balance between having optimum view of the Palace in its entirety and ensuring there is visual guidance on managing area which are sensitively to potential development - which is the overall objective of the LVMF.	No Change
City of London	General	Need to update photos and visual mgt guidance as well.	Noted	No Change
City of London	2	Parliament Hill View – reference to shard providing a strong orientation point should not be used to justify other tall buildings in background that would diminish viewer’s ability to recognise St Pauls	Reference to the Shard is in the description of the view. It is the visual management guidance which is most relevant in informing future development.	No Change
City of London	14	Support deletion of downstream River Prospect - Blackfriars	Noted	No Change
City of London	25	Support improved protection for protected silhouette	The Protected Silhouette was applied to all 3 assessments points for view 25A in the 2010 SPG.	No Change
City of London	27	Support New View: Parliament Square to Palace of Westminster	Noted	No Change

City Property Association	General	Para 9, 10 and 20 - inappropriate to refer to other local policy and guidance	It is appropriate to refer to other local policy and guidance which should be taken into account. The relative weight attached to them will depend on their status as part of the development plan or as best practice documents for example.	No Change
City Property Association	General	Para 38 - the word 'initially' is capable of misinterpretation and should be deleted	Para 39, as per the scoping exercise, there may be additional points within the Viewing Location in addition to those identified in the Management Plan which may need consideration. Therefore the word 'initially' is entirely appropriate.	No Change
City Property Association	General	Reinstatement of the word 'normally' at appropriate points	Legal advice was to remove reference to 'normally' in policy as there is already flexibility in the system to allow for exceptional circumstances. SPG needs to reflect London Plan policy.	No Change
Elizabeth House Partnership	27A (further consultation)	The revised wording provides greater clarity and recognises the range of important planning considerations that need to be taken into account when assessing development proposals.	Noted	No Change
English Heritage	14	Blackfriars - think that its removal is premature. Further analysis needed once works complete.	The modelling clearly shows that the view has been compromised. By keeping it in would downgrade the quality of the remaining views. There has always been an acknowledged through previous versions of the LVMF that this may happen.	No Change
English Heritage	20B.1	Victoria Embankment - visual guidance needs strengthening to ensure existing composition of the landmark buildings are not compromised.	Noted - agree to some	Amend

English Heritage	26	St James' Park - visual guidance to be strengthened to ensure existing architectural details are protected in terms of buildings which would complete in scale and form. Suggested textual changes	Noted	Amend
English Heritage	27A	Suggest alternative assessment points for 27A - on pedestrian island	Noted	Amend - Additional Consultation on Management Plan 27A
English Heritage	27A	Visual Mgt Guidance - suggested textual changes	Noted	Amend - Additional Consultation on Management Plan 27A
English Heritage	27B	Parliament Square - support 27B.1 and 27B.2 and welcome inclusion of Protected Silhouette.	Noted	No Change
English Heritage	27B	Visual Mgt Guidance - suggested textual changes	Suggested changes are too prescriptive.	No Change
English Heritage	27A (further consultation)	The revised assessment points provides marginal improvement to the protection of the Palace of Westminster. We are disappointed that there is no Protected Silhouette applied in this view.	Noted - a Protected Silhouette would need a further round of consultation which is not possible in terms of the timescale, it would also not provide any additional protection over and above the existing Protected Silhouettes from various view points.	No Change
English Heritage	27A (further consultation)	Welcome the increased emphasis given to the protection of the OUV of the site, however still concerned it does not go far enough. Suggested textual changes.	Many of the suggested textual changes are much stronger than both London Plan policy (which this guidance is supplementary to) as well as guidance in PPS5. Other suggestions do not add any value and in some instances may cause confusion.	No Change
Hayes Davision	27B	There is an error in the co-ordinates for 27B views.	Noted	Amend
Heritage and Environment South Westminster Conservation Group	27A (further consultation)	Believe the current protection is enough, perhaps even somewhat conservative and stifling of innovative 21st Century projects.	Noted	No Change

Jerry Hewitt	5A.1	Why was view 5A narrowed between 2009 and 2010/11	It was not changed between those dates. In fact the Mayor widened the view from 210m in 2007 to 300m in draft 2009 SPG and confirmed this in the final 2010 SPG. It has not been changed in the 2011 SPG.	No Change
London Borough of Lambeth	General	Generally supportive – provides greater clarity and certainty in dealing with issues of impact on heritage assets in particular OUV of WHS	Noted	No Change
London Borough of Lambeth	General	Welcome - It is proposed to include local maps that highlight the affected background area of protected silhouettes.	Noted - however it is not proposed to provide maps as to the areas affected by the Protected Silhouettes.	No Change
London Borough of Lambeth	General	Para 56 – GLA should be more explicit in support for high quality tall buildings	It is not appropriate for the GLA to be more explicit in support for tall buildings as per Policy 7.7 of the London Plan it is for boroughs to identify whether areas are appropriate, sensitive or inappropriate for tall buildings depending on local circumstances.	No change
London Borough of Lambeth	General	Support change in terminology of LLAA and LBAA to Wider Setting Consultation Areas	Noted	No Change
London Borough of Lambeth	General	References to LWT Tower should be changed to ITV Tower	Noted	Amend
London Borough of Lambeth	19	Page 173 ref to The London Eye appears twice in landmark box	Noted	Amend
London Borough of Lambeth	27	Recognise need to protect Westminster WHS. View 27 will affect Albert Embankment – however is consistent with draft VNEB OAPF as well as other developments in the pipeline. Suggest that height identified in VNEB OAPF (up to 80-90m) should be reflected in LVMF.	Noted. However the LVMF does not explicitly define height limits in the except for the Protected Vistas	No Change
London Borough of Hackney	General	We note the terminology changes from Lateral and Background Area Assessments to Wider Setting Consultation Area and have already embedded into our Core Strategy.	Noted	No Change

London First	General	Para 9, 10 and 20 - inappropriate to refer to other local policy and guidance	It is appropriate to refer to other local policy and guidance which should be taken into account. The relative weight attached to them will depend on their status as part of the development plan or as best practice for example.	No Change
London First	General	Para 38 - the word 'initially' is capable of misinterpretation and should be deleted	As per para 39, as per the scoping exercise, there may be additional points within the Viewing Location in addition to those identified in the Mgt Plan which may need consideration. Therefore the word 'initially' is entirely appropriate.	No Change
London First	General	Reinstatement of the word 'normally' at appropriate points	Legal advice was to remove reference to 'normally' in policy as there is already flexibility in the system to allow for exceptional circumstances. SPG needs to reflect London Plan policy.	No Change
London Forum	General	Generally supportive of para 56, 66, 75 and 87.	Noted	No Change
Montagu Evans	27A	para 423 and 427 - do not give enough weight to whole scenic experience of view point.	The introduction does give sufficient weight to important elements in the Viewing Location	No Change - Additional Consultation on Management Plan 27A
Montagu Evans	27A	Too much weight is given to County Hall in forming part of the visual enclosure. This is seen as a background buildings and should be described as such.	Amended text to recognise County Hall as a background buildings whilst still acknowledging its importance in the view.	Amend - Additional Consultation on Management Plan 27A
Montagu Evans	27A	para 426 - suggested textual changes	Para 426 is not at odds with para 430 as whilst para 426 acknowledges there is a vital sky gap, it is caveated that it is to recognise the iconic form of the clock tower. Para 430 then states that not all of the sky gap is needed in order to appreciate the iconic form and gives guidance as to how much sky is need to be kept clear.	No Change - Additional Consultation on Management Plan 27A

Montagu Evans	27A	para 430 - use of the word responds requires clarification. Should be amended to reflect policy 7.10.	Noted - changed	Amend - Additional Consultation on Management Plan 27A
Montagu Evans	27A	para 431 - highlights the central fleche - this should not be used as reference as to whether development is or is not acceptable. This is not supported by any clear evidence and is too arbitrary. Recommend this is deleted. Not clear whether document is stating there can be no dev to the right of the fleche.	An important attribute of OUV is the ability to recognise and appreciate the Clock Tower of the Palace of Westminster - there therefore needs to be clear sky around it. It is not felt however that the whole of the sky between the Clock Tower and Portcullis House is needed in order to appreciate this aspect of OUV. In addition, the preservation of the whole of the sky gap would produce undue burden on development opportunity in the Waterloo OA. As there is no geometric measure in which to measure an appropriate distance, the centre fleche of County Hall has been used.	No Change to first comment. Amend - clarification on development to right of fleche - Additional Consultation on Management Plan 27A
Montagu Evans	27A	No ref is made to Waterloo OA.	Noted.	Amend - Additional Consultation on Management Plan 27A
Montagu Evans	27B	Support Mayor's assertion that this is best overall views of the WHS.	Noted	No Change
Peter Steward Consultancy	27A	Whilst Portcullis House is identified as a landmark, there is no assessment or description of its qualities other than its distinctive roofline.	The level of description is similar to other management plans.	No Change - Additional Consultation on Management Plan 27A

Peter Steward Consultancy	27A	County Hall is noted as completing the visual enclosure to the Square. This does not warrant its ascribed landmark status. It is some distance away and not associated with the buildings of the World Heritage Site in the way those of Parliament Square are.	County Hall is considered a landmark building in terms of how the LVMF identifies important buildings which contribute to the view. It is also relatively close to the World Heritage Site and whilst it might have a different relationship with the Palace of Westminster than buildings with Parliament Square, it does have a symbolic relationship with the Palace in terms of seats of Governance.	No Change - Additional Consultation on Management Plan 27A
Peter Steward Consultancy	27A	The document could usefully elaborate on the role of the Listed Statues.	The level of description is similar to other management plans.	No Change - Additional Consultation on Management Plan 27A
South Bank Employers Group	General	Welcome Mayor's Foreword	Noted	No Change
South Bank Employers Group	General	Re-instate the word should 'normally' be refused	Legal advice was to remove reference to 'normally' in policy as there is already flexibility in the system to allow for exceptional circumstances. SPG needs to reflect London Plan policy.	No Change
South Bank Employers Group	General	Not appropriate to refer to local policy and guidance and state that such work should be taken into account.	It is appropriate to refer to other local policy and guidance which should be taken into account. The relative weight attached to them will depend on their status as part of the development plan or as best practice for example.	No Change

South Bank Employers Group	General	<p>There should be more transparency about membership and operation of Westminster WHS Steering Group if the group is to have a consultation role. Given possible impact on South Bank / Waterloo - Westminster WHS Mgt Plan is not widely enough consulted upon in relation to its weight in planning consideration. The SPG should not be supportive of objectives of WHS Mgt Plans which are not currently part of planning policy. Also pg 20 para 38, pg 32 para 72, pg para 78</p>	<p>The way the WHS Steering Group operate are governed both by UNESCO guidelines, which the UK Government is signed up through as part of the World Heritage Convention 1972, and through Circular 07/2009. The WHS Steering Groups consist of representatives of the boroughs, the GLA, DCMS, English Heritage and other property stakeholders. The Mgt Plans are drafted by these groups and under public consultation. In addition, Policy 7.10 of the London Plan state that appropriate weight should be given to implementing the relevant provisions in them. This requirement is set out through national guidance in circular 07/2009.</p>	No Change
South Bank Employers Group	General	<p>Page 29 – para 56. Do not believe ‘should be of appropriate height’ has sufficient clarity. Do not agree with inclusion of ‘should ideally contribute to dev or consolidation of clusters of tall buildings that contribute positively to the cityspace’. Whilst maybe objective in LP- it is not a relevant consideration on terms of view mgt. Individual tall buildings of highest quality are capable of enhancing a view whether or not part of a cluster.</p>	<p>Para 56 refers to appropriate height in general terms. It is the visual management guidance in each of the management plans that sets out the relative appropriateness of buildings heights for each of the views. The SPG is supplementary guidance on policies in the London Plan, therefore it is completely appropriate for it to be reflected in this SPG.</p>	No Change
South Bank Employers Group	General	<p>page 29, para 56 Welcome phrase “New dev should not harm a viewers’ ability to appreciate OUV of WHS. This should be criteria which determines whether a dev is acceptable not whether it is visible.</p>	<p>Noted. Although both that statement and other visual management guidance in this SPG will be used to determine whether development is acceptable.</p>	No Change

South Bank Employers Group	General	Page 20, para 38 – ‘initially’ should be deleted. Assessments Points chosen as there are optimum viewing points. Creates uncertainty as potentially interpreted to include assessment anywhere else in addition to the designated Assessment Points.	As per para 39, as per the scoping exercise, there may be additional points within the Viewing Location in addition to those identified in the Mgt Plan which may need consideration. Therefore the word 'initially' is entirely appropriate.	No Change
South Bank Employers Group	18	Pg 164 – para 307 says 18A.3 is dealt with as a separate point- but there is no guidance for that. In its absence – the ref to Victoria towers of St Thomas Hospital should be amended so as not to imply they warrant greater protection than is appropriate for Grade 2 Building.	Noted. Agree needs clarification.	Amend
South Bank Employers Group	18	Pg 169, para 315 the guidance states that dev should contribute positively to the setting of the cluster of County Hall, London Eye and Shell – however only County Hall is listed and therefore the requirement should only relate to County Hall. Guidance related to cluster is too prescriptive – protection of view should rely on requirement for highest design quality and obligation not to adversely affect setting of County Hall. This is also the same for 20A and 20B.	Visual guidance can relate to buildings that are not designated assets but which contribute positively to the composition of the view.	No Change
South Bank Employers Group	20	Page 180 Use of word 'may' in development may be acceptable if sensitively designed, respects historic environment and does not dominate riverside buildings. Not compatible with planning certainty - should be changed to 'would'.	The word 'may' is appropriate as whilst the criteria listed in the LVMF are important considerations, there maybe other policies and local material considerations which may also affect whether a development is acceptable in planning terms.	No Change

South Bank Employers Group	26	P225, para 418 View 26A. This guidance is effectively creating a Protected Silhouette over the trees on Duck Island. Is too prescriptive and conflicts with Mayor's foreword that London continues to be a desirable place to live, work and do business.	The visual guidance does not effectively create a Protected Silhouette over the trees or conflict with the Mayor's foreword. The description of the view simply highlights the importance of seeing landscape elements in conjunction with the two groups of buildings to enable a viewer to appreciate the historic parkland in an important part of London. This vegetation is considered valuable.	No Change
South Bank Employers Group	27A	P230 - Parliament Square. 27A. Do not understand what is meant by 'of a form that responds to OUV of WHS and its setting. Sentence is too ambiguous - as could be read as the OUV of the setting	Noted. Changed.	Amend - Additional Consultation on Management Plan 27A
South Bank Employers Group	27A	Support 2nd sentence of para 431, however do not understand requirement to reference County Hall and its central fleche. There is not requirement for this to have greater protection than a Grade 2* listed building. Do not see how new dev which meets other criteria of para 430 and 431 could be seen to adversely affect OUV merely as a consequence of impact on County Hall.	It is not its impact on County Hall which is an important factor but the impact of being able to clearly see the Clock Tower, which is an important attribute of OUV against clear sky. The fleche provides a reference point upon which some certainly can be given to assess impact on the OUV.	No Change - Additional Consultation on Management Plan 27A
The Ham and Petersham Association	9	Broadgate Tower is not in the vista alignment from King Henry's Mound. Whilst it is important to mention it in the general description, it should not appear in the purple bank on the right hand page in 'Also in the view' as it gives misleading impression it is in the vista line.	The buildings listed in the purple box are those that can be seen in the view not just in the Protected Vista element of the view.	No Change

Tony Michael	General	Detailed comments. Document is essential an academic reference work. It should say to boroughs precisely what their should include in the own LDFs about each view. It should require compliance and provide clear instruction of permitted heights on specific sites.	The SPG is supplementary to policies in the London Plan, it is therefore part of the Development Plan as well as boroughs' LDFs and should be used as part of the decision making process for planning applications. It does not therefore need to be repeated again in borough's documents. The SPG also provides clear guidance on implementing height thresholds through the Protected Vistas.	No Change
Tony Michael	General	What is needed - OS map with marked on Protected Corridors; max permitted heights - there should be no interpretation, no consultation areas; boroughs should be required to incorporate Protected Corridors and heights into LDFs; a standard phrase to make clear there is no negotiation, borough plans should require where a current buildings does not comply any redevelopment or replacement should be required to comply.	The SPG contains maps with Protected Vistas marked on - these are also provided to the boroughs through GIS. Wider Setting Consultation Areas are part of the London Plan policy and have been through a Public Examination, the SPG therefore provides guidance on the implementation of these. Boroughs are required to incorporate Protected Vista corridors into their LDFs. The SPG also makes clear that if buildings which currently do not comply with the LVMF come up for redevelopment or replacement that proposals will have to comply with the LVMF.	No Change

			View points, particularly longer distance views, are chosen based on being public accessible and being able to recognise and appreciate Strategically Important Landmarks. If the view points were much lower down, the viewer would not be able to sufficiently recognise and appreciate the Strategically Important Landmark. Architectural quality is very important in terms of visual analysis and reflects policy 7.6 in the London Plan.	
Tony Michael	General	View points must be moved to lower points, refs to architectural quality should be removed as height limits are most important and no easy way of determining quality.		No Change
Tony Michael	Glossary	Threshold plane should be added to Glossary	Noted	Amend
Westminster City Council	15	Para 250 and 251 should refer to WHS not just Palace of Westminster.	As per London Plan Policy 7.12, Part A, it is the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places in the LVMF, not the whole of the World Heritage Site.	No Change
Westminster City Council	21	para 325 states background dev that breaches roofline should be refused. This is effectively a Protected Silhouette. This should extend to whole WHS	As per the other World Heritage Sites identified in the LVMF, the Protected Silhouettes only apply to parts of the World Heritage Sites not the whole designated areas. Also Protected Silhouettes are only applied where there is a kinetic assessment between two assessment points - this is not the case for this view.	No Change
Westminster City Council	26	St James' Park - para 418 and 414 suggested textual changes. Para 414 omit sentences that moving traffic and pedestrians can be seen in several places between or beneath the vegetation. The abiding impression is of vegetation.	Amend slightly to say 'glimpsed' in several places between or beneath the vegetation.	Amend

Westminster City Council	27	Protected Silhouette should be applied to the whole of the WHS (Westminster Abbey)	As per London Plan Policy 7.12, Part A, it is the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places in the LVMF, not the whole of the World Heritage Site.	No Change
Westminster City Council	27	Change title to Parliament Square to Westminster World Heritage Site	The designated view, as per the London Plan, is from Parliament Square to the Palace of Westminster not the whole of the World Heritage Site.	No Change
Westminster City Council	27A	Para 423 and 424 - object to text as it reduces the significance of the gap by suggesting it is obscured by traffic lights and street furniture. Text in para 424 should be omitted or amended simply to indicate opportunities should be taken rationalise street furniture.	para 423 - additional consultation. Para 424 - this para deals with the description of the view. Para 433 is about managing the viewing location and this issue is addressed there.	Additional Consultation on Management Plan 27
Westminster City Council	27A	Visual Mgt Guidance - suggested textual changes	The visual guidance has been amended to reflect the change in assessment point and is subject to further consultation. It is not however accepted that the whole gap is needed to be kept clear in order to appreciate the dominance of the Palace of Westminster.	Additional Consultation on Management Plan 27
Westminster City Council	27A	Para 432 is welcomed but consider it should be a Protected Silhouette. Do not understand why Protected Silhouettes cannot be applied to single points.	As per the other World Heritage Sites identified in the LVMF, Protected Silhouettes are only applied where there is a kinetic assessment between two assessment points.	No Change - Additional Consultation on Management Plan 27A
Westminster City Council	27A	Para 430 - 431 wording is ambiguous and should place more value and emphasis on the importance of the gap.	Visual guidance is subject to further consultation.	Additional Consultation on Management Plan 27

Westminster City Council	27A	Para 444 suggested textual changes. Protected Silhouette should apply to the whole of the World Heritage Site not just the Palace of Westminster.	As per London Plan Policy 7.12, Part A, it is the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places in the LVMF, not the whole of the World Heritage Site.	No Change - Additional Consultation on Management Plan 27A
Westminster City Council	27B	Para 443 - Suggested textual changes.	This is too prescriptive. Unable to use trees to define height limits to buildings as those heights can change through pruning and would not allow for fair comparison between proposals.	No Change
Westminster City Council	27A (further consultation)	No objection to new view point chosen and statement that development between Clock Tower and fleche of County Hall should be refused.	Noted	No Change
Westminster City Council	27A (further consultation)	Strongly object to wording that positively encourages new development between the fleche of County Hall and Portcullis House. This is at odds with recognition of the importance of the subdued horizontal form of County Hall. We would reiterate that architectural quality is not determining factor of acceptability.	The wording recognises that the fact that the Waterloo Opportunity Area is in the background of the view. This is consistent with other management plans in the LVMF. We note the emphasis of using the word 'subdued' is slightly in conflict with the rest of the visual guidance. The visual guidance is clear that the impact should be assessed against the OUV of the World Heritage Site.	Amend - remove 'subdued'.