



The Mews Offices  
College Way  
Old Royal Naval College,  
Greenwich, London SE10 9LW

T: 020 8293 0439

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By email: [LondonPlan@london.gov.uk](mailto:LondonPlan@london.gov.uk)

Dear Sir or Madam

**The London Plan, The Spatial Development Strategy for Greater London - Draft for Public Consultation (2017)**

On behalf of the Maritime Greenwich World Heritage Site (WHS) Partnership, I am responding to the Greater London Authority (GLA) consultation on the Mayor of London's draft new London Plan. Our general observations are set out below with more detailed comments on specific sections of the London Plan shown at **Annex A** to this letter. We also propose to respond to the consultation using the on-line response facility in which these comments will be replicated.

Maritime Greenwich World Heritage Site

Maritime Greenwich was inscribed on the World Heritage List by UNESCO in 1997. Protection for the site, its setting and buffer zone is enshrined in the spatial planning system operated by local planning authorities and statutory designation. The WHS is administered by a Partnership assisted by an Executive Sub Group (the Executive), working to a Management Plan for the Site. Maritime Greenwich is located within the Greater London area and is consequently affected by strategic policies, in particular those connected to development, the environment and vehicle movement.

The WHS Executive is responsible for the overall management of the site and comprises Royal Borough of Greenwich, Greenwich Foundation for the Old Royal Naval College, Royal Museums Greenwich, The Royal Parks, Greenwich Hospital, University of Greenwich, Visit Greenwich, Trinity Laban Conservatoire of Music and Dance and St Alfege Church.

We have considered the consultation document with particular reference to London's heritage and culture and the potential impact of tall buildings on the important heritage views and vistas on the Outstanding Universal Value (OUV) of its World Heritage Sites and their settings. We have also considered the document in the light of the Maritime Greenwich World Heritage Site Management Plan, published in December 2014.

We consider the document to be sound and welcome the separate section afforded to Heritage and Culture emphasising its importance in driving good growth, and the introduction of heritage and culture key performance indicators actors. We are also pleased to additions to and greater clarity on its sections on Design (Policy D8 Tall Buildings) and Heritage and Culture (Policies HC2 – HC4 World Heritage Sites, Strategic and Local Views and the London View Management Framework Supplementary Planning Guidance - SPG) along with stronger encouragement for cross border borough collaboration for the protection of World Heritage Sites in neighbouring areas. We note the Mayor's commitment to reviewing the SPG to ensure it is compliant with Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework and we would encourage this to be done at the earliest opportunity.

The new draft revised London Plan appears to slot in well with the tenor of the National Planning Policy Framework (NPPF) and Historic England's Tall Buildings Advice Note 4 and clearly references the importance World Heritage Site Management Plans. The proof of the pudding, of course, is in the implementation of the Plan and ensuring that Planning Authorities maintain a robust approach in assessing development proposals and planning applications coming on stream to ensure that the aspirations set out in the London Plan are delivered, in particular with reference to tall buildings and a responsible approach to maintaining the visual integrity of London's skyline.

We note that summary material in the consultation information pack confidently states that *"The London Plan sets the policy framework for local plans across London, and its policies must be followed when planning decisions are made"* but we anticipate that this statement will inevitably be tested. We also note that at its annual meeting in the summer of 2017, and following a joint ICOMOS/ICCROM Reactive Monitoring Mission to Westminster in February 2017, UNESCO's World Heritage Committee expressed concern about inadequacies in the UK's urban planning framework to manage development in the setting of the Westminster site (and by implication other London and UK World Heritage Sites). The Committee was also concerned that developments including tall buildings were being approved contrary to the advice of Historic England and that once a planning decision is consented it was not possible to challenge it save for a call-in by the Secretary of State. The Committee recommended that planning policies should ensure that the balance between protection of Outstanding Universal Value (OUV) and other benefits should be more strongly weighted towards protecting OUV. We strongly support this view and urge the Mayor to take account of the World Heritage Committee's decisions relating to UK World Heritage Sites when implementing the London Plan.

Meanwhile, we note and applaud the Mayor's stated interest in a strategic approach to protecting London's World Heritage Sites and would encourage his office to take a more proactive approach to addressing cross-London issues which affect those sites. Our more detailed comments on specific sections of the draft new London Plan are set out in **Annex A** to this letter.

Please let me know if you require any further information.

Yours sincerely



**Peter Marsden**  
**Maritime Greenwich World Heritage Co-ordinator**

Cc Maritime Greenwich World Heritage Site Executive

## The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation (2017): Response from the Maritime Greenwich World Heritage Site Partnership - Specific Comments

### Chapter 3: Design

#### Policy D8 Tall Buildings

*[Replaces Policy 7.7: Design and Location of Tall and Large Buildings]*

#### Comment

We welcome the revision to Policy 7.7 Location and Design of Tall and Large Buildings set out in the existing London Plan (March 2016) and consider that Policy D8 generally provides a more detailed and comprehensive guidance on tall building development in London.

The issue of tall buildings development in the wider setting of London's four WHSs, (Maritime Greenwich, Tower of London, Westminster and Royal Botanic Gardens, Kew) has been of great concern in recent years because of the threat to strategic views to and from these WHSs and on the impact on London's skyline. In the case of Maritime Greenwich, continuing development west of the Canary Wharf cluster has the potential to undermine the significance Sir Christopher Wren's historic Grand Axis as a key attribute of the Outstanding Universal Value (OUV) of Maritime Greenwich, impair views to and from the WHS and destroy the visual integrity of London's skyline forever.

We believe that developers need to ensure that planning applications for tall buildings fully address the issue of visual layering, colour, materiality and stepping down in height and scale of development to ensure gaps and undulations in the skyline to avoid the unsightly appearance of 'table topping'. We are therefore encouraged that Policy D8 recognises that tall buildings can have 'detrimental, visual, functional and environmental impacts if in appropriate locations and/or of poor quality design'. We also welcome recognition of the importance of London's existing and emerging skyline as an asset to London, arguably as important as the historic cultural fabric of the city.

#### Specific Points

##### Paragraph 2 Definition A

We believe that it is important to retain the visual integrity of London's skyline, maintain undulation and avoid 'table topping'. In order to qualify the definition of a tall building, reference should also be made to mass and density. We recommend that paragraph 2 (A) be reworded as follows:

*"based on local context, development Plans should define what is considered a tall building, the height, **mass and density** of which may vary in different parts of London"*

##### Paragraph 4 – Impacts C

We recommend that paragraph 4 Impacts e) be expanded as follows:

*"Buildings in the **buffer zone or wider setting** of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site **and not compromise strategic views or important vistas to or from the Site.**"*

### Paragraph 5 public access D 3.8.3

We find it extremely helpful that the Mayor will work with boroughs to provide a **strategic overview** of tall buildings across London (D 3.8.3). We believe that further guidance to boroughs on the definition of tall buildings (para 2 B) and location (para 3 B) would be helpful. We would also like to see reference made to the Mayor's mandate to "call-in" consented development applications for tall buildings which are outwith the London Plan guidelines or to which objections have been made by Historic England.

## **Chapter 7: Heritage and Culture**

### **Policy HC2 World Heritage Sites**

*[Replaces Policy 7.10: World Heritage Sites]*

#### **Comment**

We welcome the revision of Policy 7.10 and the greater emphasis on the significance of World Heritage Site Management Plans and the important role of Local Planning Authorities, both those with World Heritage Sites in their areas and those that are neighbours to local authorities with World Heritage Sites. The policy now requires that the planning process and policies of Local Planning Authorities including Local Plans should ensure that development proposals conserve, promote, protect and enhance the Outstanding Universal Value of World Heritage Sites, their authenticity and integrity, key themes of the World Heritage Convention, 1972. We also welcome recognition of the importance of attributes of Outstanding Universal Value and that these should be taken into account in considering any impact of development on World Heritage Sites, their buffer zones, immediate settings, strategic views and important vistas.

#### **Specific Points**

##### Policy HC2 B

We are pleased to see reference to the fact that Development Proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. We consider that it would be helpful here to reference guidance published by the International Council on Monuments and Sites (ICOMOS): ***Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (A publication of the International Council on Monuments and Sites) January 2011***. This can be found at [https://www.icomos.org/world\\_heritage/HIA\\_20110201.pdf](https://www.icomos.org/world_heritage/HIA_20110201.pdf)

##### Paragraph 7.2.1

We agree that, in ratifying the (1972) World Heritage Convention, the UK Government has made a commitment to conserving and enhancing World Heritage Sites' Outstanding Universal Value. Our view is that this is an ongoing commitment of the State Party (led for Government by the Department for Digital, Culture, Media and Sport (DCMS)). Clearly, meeting the UK's obligations relating to World Heritage Sites under the Convention, is a shared responsibility including that of World Heritage Site Partnerships and relevant Local Authorities. However, we are not aware of any formal transfer of this responsibility to Local authorities and consider that the final sentence of paragraph 7.2.1 should be clarified.

#### Paragraph 7.2.4

In relation to Maritime Greenwich, we recommend an amendment to the text as follows:

*“.....It is expected that the following boroughs should contain such policies.....Royal Borough of Greenwich, **London Borough of Tower Hamlets and London Borough Lewisham** (Maritime Greenwich WHS).....”*

#### Paragraph 7.2.6

We note and applaud the Mayor’s commitment to supporting steering groups in managing World Heritage Sites and actively engaging with stakeholders in implementing Management Plans. However, we believe that there is an opportunity for the Mayor’s office to take a more proactive role in coordinating and addressing key issues appertaining to all four of London’s World Heritage Sites, in particular: facilitating the implementation of London-wide policies relating to World Heritage Sites; the promotion of London’s World Heritage Sites as a critical mass and important assets of the capital; addressing the relentless march of tall buildings; and the impact of wider development and changing environments on the settings of London’s World Heritage Sites. We would welcome consideration of such an initiative and reference to it in the draft new London Plan.

#### **Policy HC3 Strategic and Local Views**

*[Replaces Policy 7.11: London View Management Framework]*

#### **Comment**

We welcome the addition of Policies HC3 F and G to the new draft London Plan. Policy F requires Boroughs to include all designated views and protected vistas in Local Plans and work with Landowners to ensure inclusive public access to the viewing location and the views’ foreground, middle ground and background are effectively managed in accordance with the LVMF SPG. Policy G requires Boroughs to clearly identify important local views in their Local Plans and strategies and where local views borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

We believe that inclusion of designated views and protected vistas in Local plans is a step forward in encouraging boroughs – and cross borough consortia - to place greater emphasis on protecting these views. Similarly, by identifying important local views, the potential to maintain or enhance the Outstanding Universal Value of London’s Word Heritage Sites is strengthened by giving a clear indication to developers what might give rise to an adverse impact on a world Heritage Site and what might or might not be acceptable in planning terms prior to the development of planning applications. We also endorse the supporting text in paragraphs 7.3.5 and 7.3.6.

## **Policy HC4 London View Management Framework**

*[Replaces Policy 7.12: Implementing the London View Management Framework]*

### **Comment**

We note that Policies A – F of HC4 are substantively the same as those set out in 7.12 of the existing London Plan. We welcome the additional references to externally illuminated structures (HC4 C) and the statement that development in the background of a Protected vista should not harm its composition or the viewer's ability to appreciate the Strategically-Important Landmark (HC4 F3).

### **Specific Points**

#### Policy HC4 C

We believe that in addition to external illumination, the exterior colour of a structure should not harm the composition of the view as a whole and suggest a text amendment as follows:

“C Development proposals *and external colour* and illumination of structures in the background of a view should give context to.....”

**Peter Marsden, Maritime Greenwich WHS Co-ordinator.**

1 March 2018