WESTMINSTER CITY COUNCIL

BUILDING HEIGHT STUDY

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City of Westminster

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Tall buildings in Westminster must respect heritage assets including the Palace of Westminster

1 INTRODUCTION

1.1 PURPOSE OF THE STUDY

Westminster City Council (WCC) is currently updating its planning policies through the review of the City Plan. WCC recently consulted on an informal draft of the City Plan 2019-2040 (November 2018) and is now working towards publication (Regulation 19) of the plan.

The draft City Plan sets out ambitious targets for housing and commercial growth in the city for a period up to 2040. A large proportion of this growth will be directed to the identified growth areas of the Victoria and Paddington Opportunity Areas as well as the West End (including Tottenham Court Road Opportunity Area) and to housing renewal areas at Church Street and Edgware Road and Ebury Bridge estate. The draft City Plan advocates a design-led approach to building height, but also seeks to provide clarity on what heights will be acceptable in these growth areas.

As with other parts of London, Westminster has recently seen a number of proposals for higher or tall buildings. It is recognised that building higher can help deliver growth in the city, but it is important that tall/higher buildings are appropriately designed and are appropriate to the local context. This is particularly important given the high-quality townscapes and high concentration of heritage assets in Westminster and Central London. A robust, well-evidenced policy is therefore required to ensure higher building proposals are appropriate.

The revised City Plan needs to be in general conformity with the London Plan. The draft new London Plan (2018) requires boroughs to provide a definition of what constitutes a tall building based on local context and indicate in their Local Plans specific locations where tall buildings will be acceptable in principle. This study provides the evidence base to support the new City Plan heights policy.

This building heights study draws on existing evidence, studies and data to:

- Analyse the character, prevailing heights and constraints of different part of the city;
- Identify the location and height of consented tall buildings proposals to understand where change is likely to happen;
- Identify areas that may be appropriate for higher buildings; and
- Advise on parameters for appropriate building height for different areas in the city through simple 3D modelling.

1.2 STRUCTURE OF THE REPORT

This study is structured in the following sections:

SECTION 1: INTRODUCTION

SECTION 2: BRIEF POLICY OVERVIEW

The study is based on a robust understanding of the policy context in relation to tall buildings in London. This section provides a brief overview of the national, regional and local planning policy context, including Historic England's Advice Note on tall buildings and a review of the current tall building policy in Westminster. This section also identifies where the City Plan anticipates growth and intensification to meet housing and employment need.

SECTION 3: TALL BUILDINGS - ISSUES AND OPPORTUNITIES

This section provides a brief overview of the opportunities that are presented by tall buildings and balances this by identifying the issues and challenges that they present.

SECTION 4: TALL BUILDINGS - A DEFINITION AND THEORETICAL FRAMEWORK

This section sets out the theoretical baseline for the building heights study. It includes a definition of what constitutes a tall building, an approach to classifying tall buildings in relation to their role within a place and the scope for tall buildings to enhance legibility, to contribute to the skyline and city image, and to form clusters.

SECTION 5: WESTMINSTER SPATIAL OVERVIEW

This section provides a spatial overview of the borough, identifying it's history, spatial structure, distribution of land uses, and public transport accessibility. A detailed mapping of existing building heights across the borough has been undertaken and this illustrates the typical height and scale of development in Westminster, as well as where exceptional height is concentrated.

This section also identifies areas that are potentially sensitive to tall buildings through mapping of listed buildings, conservation area designations, protected vistas and local views, local landmarks and topography.

SECTION 6: DEVELOPMENT PRESSURE AND CHANGE

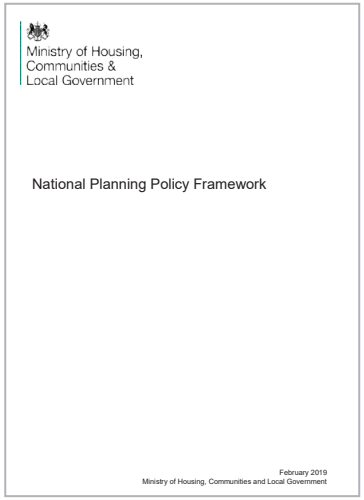
This section sets out the development pressure that the borough is facing. It provides a summary of recent tall building proposals and their locations.

SECTION 7: A PLAN LED APPROACH TO TALL BUILDINGS

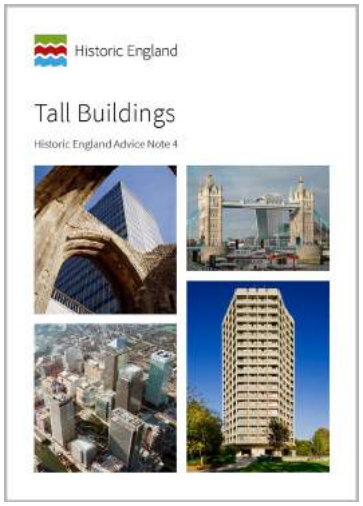
This final section considers where tall buildings may be appropriate across Westminster. It sets out a Plan led approach to the consideration of tall buildings in the borough identifying a number of tall building objectives and identifying a number of Focus Areas where tall buildings may be appropriate and exploring these in further detail.

Recommendations on the potential for tall buildings in these areas are made supported by visibility analysis and 3D modelling work.

The modelling work is provided within a separate report..



National Planning Policy Framework (February 2019)



Historic England Tall Buildings Advice Note (December 2015)

2 BRIEF POLICY OVERVIEW

This chapter provides a summary of the policy relating to tall buildings. It is not intended to be comprehensive but rather to establish a policy overview.

2.1 NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) (2018) sets out the government's objectives for new development. The NPPF does not have any specific policies on tall buildings, however, it sets out a number of more general design and planning principles which are relevant to the development of tall buildings.

Good design is a key requirement of the NPPF. The NPPF states that it is important to plan positively to achieve high quality and inclusive design and that local authorities should develop robust and comprehensive policies that set out the quality of development that will be expected in their area. These should be based on a clear vision for the future of the area and upon a detailed evaluation of the characteristics that define it.

The NPPF promotes an urban design led approach to planning that requires buildings to respond to the location in which they are located rather than prescribe specific architectural styles.

Chapter 12, Well-designed places, paragraph 127 notes that:

Planning policies and decisions should ensure that developments:

a. *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

b. *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

c. *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

Chapter 9 para 103 states that:

'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.'

2.2 HISTORIC ENGLAND - TALL BUILDINGS ADVICE NOTE

Historic England published a Tall Buildings Advice Note in December 2015. It is intended to support all of those involved in dealing with proposals for tall buildings from designers to local authorities. It supersedes the earlier 2007 CABE/English Heritage 'Guidance on Tall Buildings'. Although its primary focus is the impact of tall buildings on heritage assets, it also provides a number of general guidelines surrounding the design and location of tall buildings.

The document does not take a negative stance against tall buildings. It states that tall buildings can be excellent works of architecture and make a positive contribution to towns and cities. However, the Advice Note states that for tall buildings to be successful measures to control the location and design of such structures must be embedded in local planning documents.

The Advice Note promotes a plan led and positive approach to the location and design of tall buildings. It states that this should be specific to an area and include a local definition for tall buildings that is appropriate to its specific context (rather than being guided by a defined number of storeys/metres).

Local Plans will be expected to:

- Identify the role and contribution of tall buildings as part of an overall vision for a place;
- Ensure that the setting of heritage assets are protected from any potential negative impact from tall buildings;
- Identify areas that are appropriate for tall buildings;
- Express design requirements for tall buildings;
- Encourage a mix of uses within tall buildings that are required in the local area;
- Ensure early public consultation is undertaken;
- Reduce inappropriate applications for tall buildings in the wrong places;
- Ensure that tall building applications fully consider the impacts on local people;
- Identify sites where removal of existing tall buildings may enhance the environment; and
- Identify whether tall buildings are the most appropriate way to deliver high densities or whether another solution is more appropriate.

The Advice Note states that the scale and form of development should be assessed as part of the formulation of the local plan. It suggests the use of characterisation/building height studies as well as heritage and urban design assessments to designate appropriate locations and polices for tall buildings. The document very clearly states that the existence of a tall building on a site is not a justification for a replacement building of the same scale or on an adjoining site.

The Advice Note makes a general requirement for tall buildings to set exemplary standards of design and states that a high quality tall building will have a positive relationship with:

- Topography;
- Character;
- Heritage assets;
- Height and scale of surrounding development;
- Urban grain and streetscape;
- Open spaces;
- Rivers;
- Important views and panoramas; and
- The skyline.

The Advice Note promotes an urban design led approach with less attention on architectural style or detailing. The specific guidance on the form and shape of tall buildings included in the 2007 Guidance is not included.

2.3 THE LONDON PLAN

The London Plan is the statutory spatial development strategy for greater London. All of London's boroughs local development plans should be in general conformity with the policies included within this document.

The current adopted London Plan (2016) defines tall buildings as structures that:

- Are substantially taller than their surroundings;
- Cause a significant change to the skyline; and
- Are larger than the threshold sizes set for the referral of planning applications to the Mayor (currently above 30m in height).

Policy 7.7 'Location and Design of Tall and Large Buildings,' is the primary policy related to this type of building.

Part A states that

Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

Part E then states that:

The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

The policy goes on to state that through their plan preparation Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.

THE DRAFT NEW LONDON PLAN

The Greater London Authority is in the process of preparing a new London Plan. This introduces a new requirement to define tall buildings based on local context and London Boroughs must set out if there are locations where tall buildings are acceptable in principle in their borough in line with the impacts listed in the policy.

Following Examination in Public the emerging policy D8 'Tall buildings' states that: 'Tall buildings should only be developed in sustainable locations that are identified in Development Plans', and that:

Boroughs should identify any such locations on maps in Development Plans, and should indicate the general building heights that would be appropriate in these locations, taking account of:

- the visual, functional, environmental and cumulative impacts of tall buildings; and
- the public transport accessibility of different locations to ensure any future tall building development is focused in areas that are well connected by public transport.

This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

In terms of visual impacts the draft policy states that the views of buildings from long range, mid range and immediate views from the surrounding streets need to be considered and that where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

The policy also states that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings and that buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.

2.4 WESTMINSTER CITY POLICIES

HIGH BUILDINGS STUDY (2000)

The previous Westminster high buildings study was prepared for the City by EDAW in association with Buro Happold and Urban Projects June 2000. While it provides useful background it now out of date.

WESTMINSTER HIGH BUILDINGS SAVED UDP POLICY (2010)

The saved UDP Policy DES 3 High Buildings, is Westminster's current high buildings policy and aims to protect and enhance Westminster's townscape, historic character and skyline.

This policy is in three parts the first being that high buildings (defined as being that which is significantly higher than its surroundings) will not be permitted where they intrude or have adverse impacts on strategic views, on heritage assets, or on the prevailing character of an area; the second that existing tall buildings should not set a precedent for similar development; and the third that high buildings may be exceptionally permitted where they contribute to the improvement or the regeneration of the locality within which they would be sited. In this case they must meet a number of detailed criteria relating to their role, location, and wider issues of accessibility and public realm enhancements and minimise impacts for instance on microclimate.

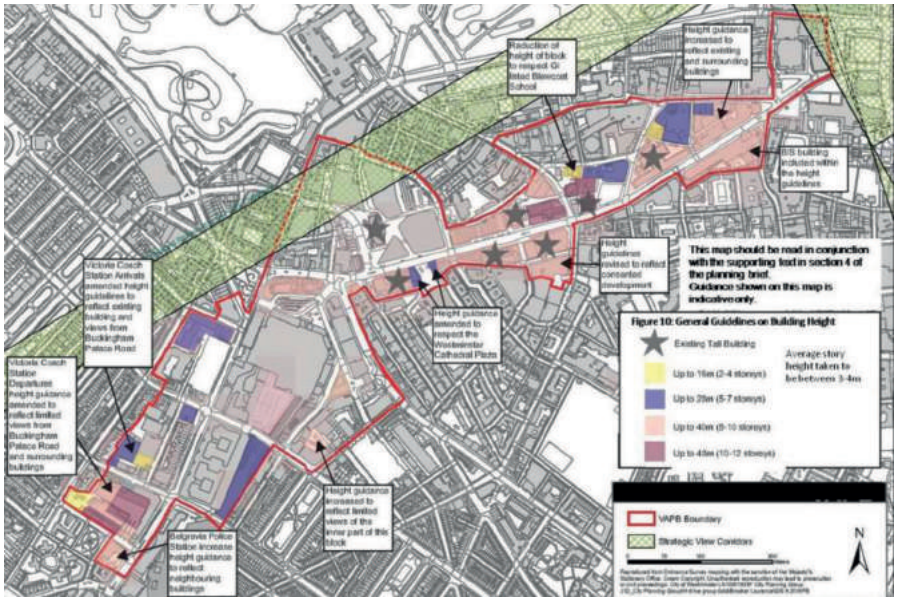


Figure 2.1: General guidance on building height (Figure 10) from Victoria Planning Brief 2011

WESTMINSTER CITY PLAN (2016)

Policy S26 (Views) in the current plan states that Westminster is not generally appropriate for tall buildings as they have adverse impact on character and local distinctiveness of areas, and on important views.

However, adopted policy in relation to the Opportunity Areas does identify potential for taller buildings:

- **Paddington (Policy S3)** Identifies scope for medium height large floorplate buildings and one significant taller building of exceptional quality;
- **Victoria (Policy S4)** Tall buildings may be acceptable in a limited number of locations where they do not harm heritage assets; and
- **Tottenham Court Road Opportunity Area (Policy S5)** is not considered to be appropriate for tall buildings.

VICTORIA PLANNING BRIEF

The Victoria Planning Brief adopted in 2011 also indicates potential for tall buildings within the Opportunity Area. This document indicates height guidance for different parts of the Opportunity Area with 5-7 storey buildings (up to 28m) indicated in some areas (typically towards the edge of the area), 8-10 storey (up to 40m) along Victoria Street and 10-12 storey buildings (up to 48m) on the junction of Victoria Street and Buckingham Gate.

However whilst this brief has been in place buildings of a much greater height have been consented and built within the area and the height guidance cannot therefore be relied upon to inform and guide height within the area.

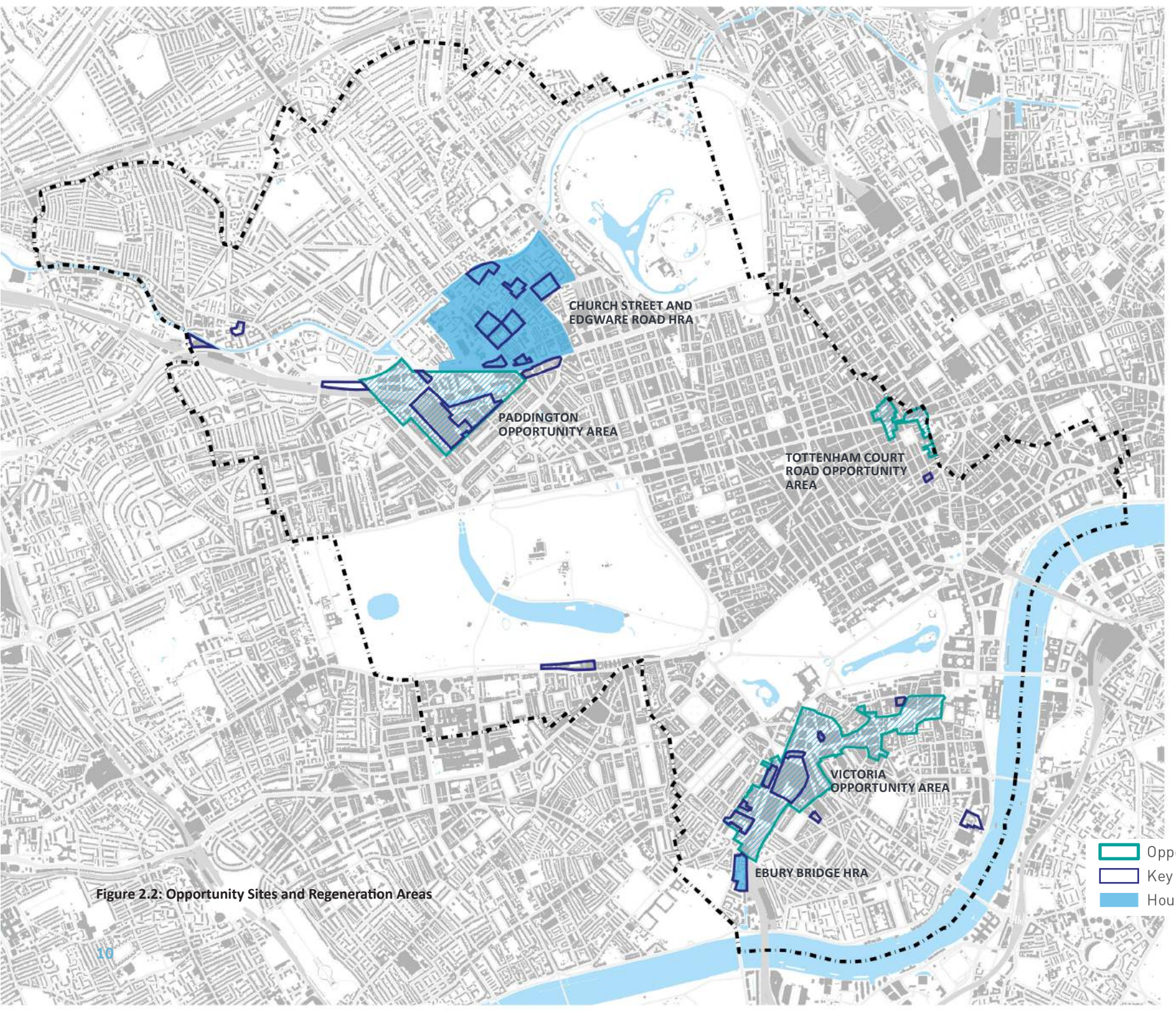


Figure 2.2: Opportunity Sites and Regeneration Areas

DRAFT CITY PLAN 2019-2040

The emerging City Plan published for informal consultation in 2018 included a number of policies that help to guide the scale, height and massing of buildings in the City. These include:

- **Policy 37 - Design Principles** which states that 'All development will positively contribute to Westminster's townscape and streetscape, having regard to … the character and appearance of the existing area';

- **Policy 39 - Townscape and Architecture** which states that 'Development will be sensitively designed, having regard to the prevailing scale, character, external materials, architectural quality and degree of uniformity in the surrounding townscape'; and

- **Policy 40 - Density and Building Height** which states that 'Development will optimise the density of the site, making the most efficient use of land.

Policy 40 - Density and Building Height provides the following height guidance:

- **Victoria and Paddington Opportunity Areas** potential for buildings of up to twice the prevailing height of surrounding area i.e. 12 storeys in Victoria or 20 storeys in Paddington. The policy however states that in exceptional circumstances buildings of greater height i.e. 18 storeys in Victoria or 30 storeys in Paddington may be permitted if support from the local and neighbouring communities is demonstrated, they make a significant contribution to the housing and economic objectives of this plan; and are of exemplary design;

- **Church Street and Edgware Road HRA** - around 12 storeys; and

- **Ebury Bridge HRA** - around 16 storeys.

These areas are considered as exceptions within the City with explanatory paragraph 40.4 to the policy stating that '*Most of Westminster is not suitable for higher buildings as they would adversely impact on local character, the historic environment, open spaces and the amenity of residents.*'

This study will serve to provide a robustness to support or amend the guidance.

Draft City Plan (March 2016)

A new cluster of tall buildings is emerging at Vauxhall

3 TALL BUILDINGS - ISSUES AND OPPORTUNITIES

3.1 INTRODUCTION

Tall buildings are a contentious topic. The last decade has seen many new tall buildings constructed all over London. This has had a profound effect on London's skyline, which in some places has altered beyond recognition.

Towers have been developed, not only in the commercial centres of the City of London and Canary Wharf, but also along the river Thames, in the city fringe, in London's town centres, as well as in more peripheral and outer London boroughs. Towers have become higher and higher, with The Shard at some point becoming the tallest building in Europe and residential tall buildings reaching 40 and more storeys.

Within Westminster new tall buildings have emerged in Paddington and Victoria in particular and the setting and outlook of the City is changing through clusters of tall buildings emerging across the river at Nine Elms in the London Borough of Wandsworth and Vauxhall in London Borough of Lambeth.

The proponents of tall buildings argue that tall buildings are essential for London's world city status, to compete globally and project an image of being open to business. That they are important in increasing development density, allow thousands more people to live and work near transport hubs, give previously unheralded areas a new identity and play an important role aesthetically and as economic catalyst for regeneration.

However, there have always been voices opposing tall buildings, for a variety of different reasons. Tall buildings can have an adverse impact on the value of special buildings, designated heritage assets or protected parks and gardens, or their settings. They can undermine the character of a place, or intrude into, and undermine cherished views of landmarks or urban skylines.

It is true to say that both parties are right to some extent and that the critical issue is to respond to the opportunities that tall buildings may provide whilst also addressing and responding appropriately to the issues that they may create.

3.2 TALL BUILDING OPPORTUNITIES

Tall buildings offer a number of opportunities including the potential:

- To increase density to make best use of infrastructure;
- To respond to a constrained location;
- To enhance legibility through marking a specific and important location or vista;
- To shape and redefine the City image;
- To stimulate and act as a catalyst for regeneration increasing market confidence and development activity in an area;
- For direct public benefits including but not limited to:
  - Provision of public spaces / public realm;
  - Viewing platforms to look across the city;
  - Provision of mixed use or facilities; and
  - Provision of funding for heritage assets.
- To assist viability of a larger scheme through:
  - The higher values generated by an exclusive product; and
  - Higher levels of return.
- And thereby bridge a viability gap or facilitate the delivery of affordable housing / employment spaces.

3.3 TALL BUILDING CHALLENGES

However whilst tall buildings may offer these opportunities they also present a number of issues that must be considered and addressed. They can:

- Cause harm to heritage assets by:
  - Impacting on setting; and / or
  - Impacting on views to and from an asset.
- Contribute to a fragmented skyline and poor city image if not carefully planned;
- Impact on microclimate causing:
  - Wind funnelling;
  - Overshadowing; and
  - Sun reflection.
- Impact on residential amenity including:
  - Privacy;
  - Loss of daylight and sunlight and increased sense of enclosure; and
  - The quality of outdoor spaces.
- Present a poor relationship with the public realm at the ground floor level through their need for servicing, particularly if delivered as point blocks rather than as part of a larger blocks or development scheme (when servicing areas can be hidden internal to the block);
- Impact on the quality of place if not designed well – due to their increased height tall buildings are more visible and the quality of the design needs to therefore be exceptional;
- Encourage more tall buildings. In some places Tall Buildings are not seen as an exception and the approval of a tall building emboldens developers looking at other sites encouraging them to push boundaries and try their luck; and
- Drive up land value through speculation which can then undermine viability of other development forms. In this circumstance a market downturn can lead to development stagnation which holds back regeneration.

Without a clear strategy to manage tall buildings they can irrevocably change a place:

- Tall buildings become an acceptable typology;
- More sites come forward for tall buildings;
- It becomes increasingly difficult to reject them;
- Damage to heritage and context becomes accepted; and
- This then leads to irrevocably changes the townscape, skyline and image.

Taller buildinsg can impact on valued heritage assets as here in Westmoreland Terrace

4 TALL BUILDINGS - A DEFINITION AND THEORETICAL FRAMEWORK

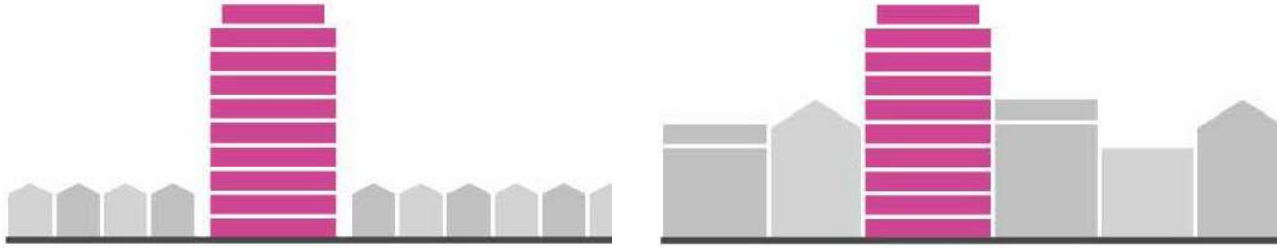
4.1 CONTEXT HEIGHT RATIO

A ‘tall building’ is a relative term. A ten-storey building might be a (very) tall building in a predominantly two-storey suburban area, yet would be considered only as a local high point in an urban five to six storey context. Thus, tall buildings must be considered in relation to their local context.

The taller a building the greater is its presence and impact, both locally as well as on the skyline. The ratio of the height of a tall building to the prevailing contextual height is a useful indicator of the extent of ‘tallness’ of a building within its specific context. We call this the Context Height Ratio (CHR).

The CHR provides a measure of the extent to which a building is ‘outstanding’ on the skyline considering the prevailing height and scale of development of a place. It also provides a relative means to discuss and compare heights that is more straightforward to use than absolute measurements in storey heights or metres. It also enables the simple categorisation of tall buildings by height in respect to their context height.

The prevailing height in an area, as well as the degree of variation or coherence in building height, are important physical attributes that shape the experiential quality of an area and define its character. These attributes are the contextual references against which the height of a tall building is recognised and appreciated from the urban environment.



Context: 2 storeys / 10 storeys = tall building

Context: 5-6 storeys / 10 storeys = local high point

Figure 4.1: The impact of a tall building is related to its context

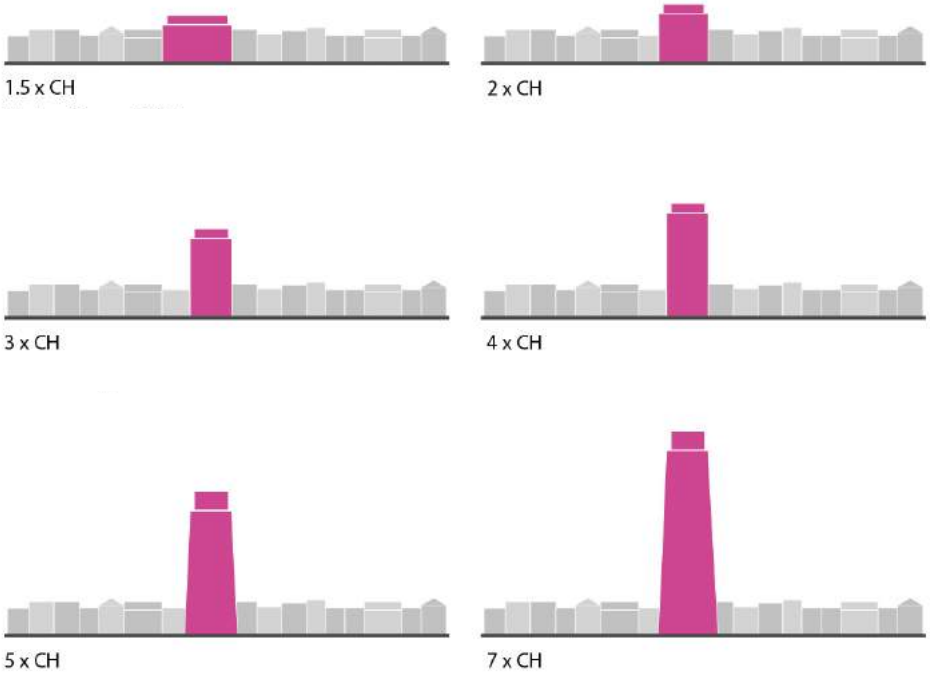


Figure 4.2: The height of buildings can be expressed as 'context height ratio'

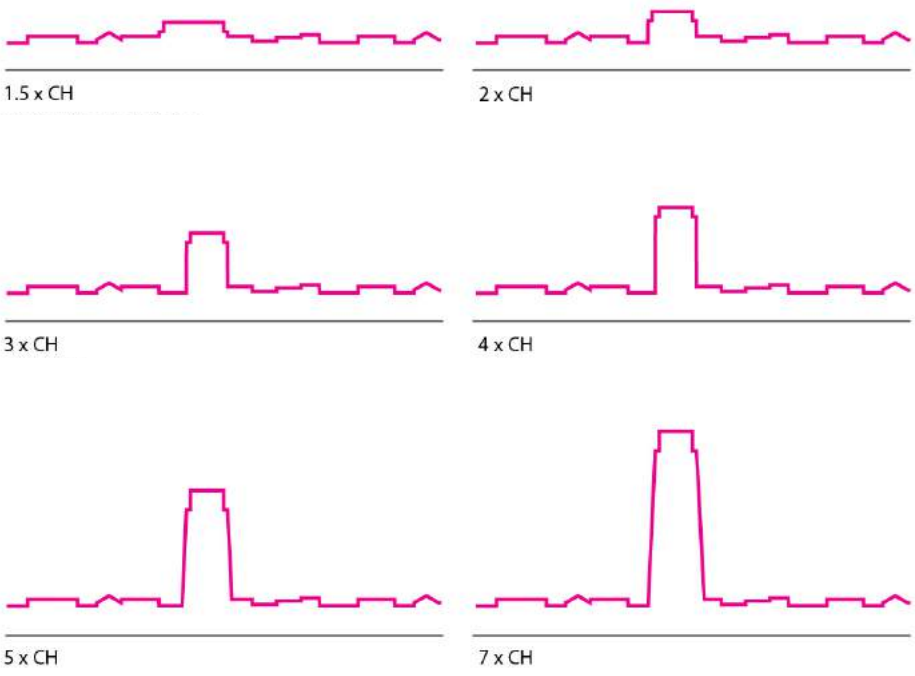


Figure 4.3: The context height expressed as an impact on the skyline

4.2 BUILDING HEIGHT CLASSIFICATION

This study categorises tall buildings into different height groups by reference to their context height ratio. This allows a simple expression of the 'tallness' and impact of a tall building within its context as well as on the skyline.

Figure 4.4 diagrammatically depicts a large or tall building within its context. It illustrates how the relationship between the taller element and its surrounding context changes as its height increases. In reference to the context height ratio it identifies four height classifications:

- Large/higher building;
- Local Landmark;
- District Landmark; and
- Metropolitan Landmark.

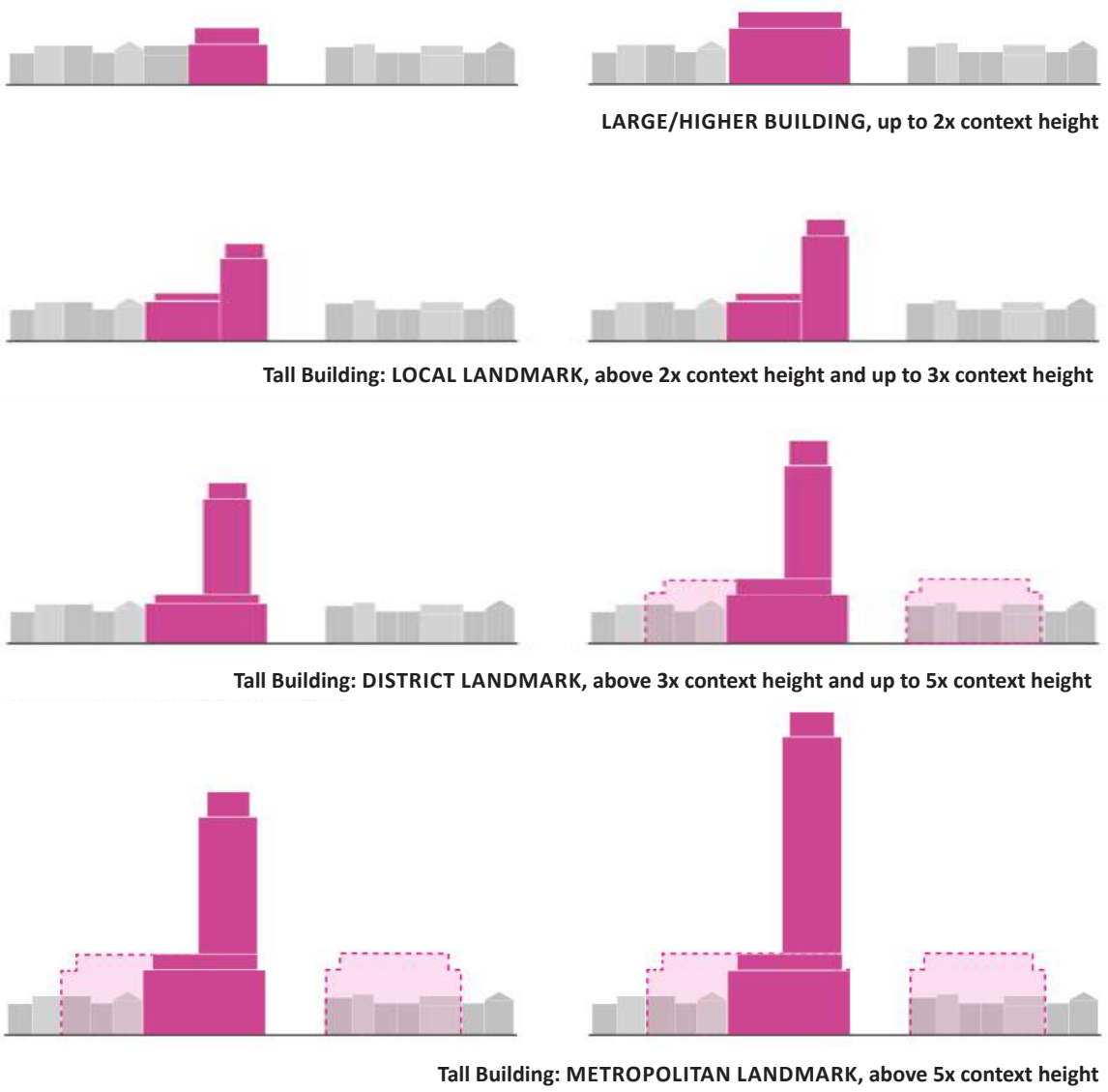


Figure 4.4: Diagram indicating the principles of height relativity and tall building classification

COHERENT VS VARIED CONTEXT

The definition of a tall building must also take account of the level of coherence of height in a given area, as greater building height in places with more homogenous or coherent height characteristics will have a greater impact than in places where there is more height variation (refer to Figure 4.5 below).

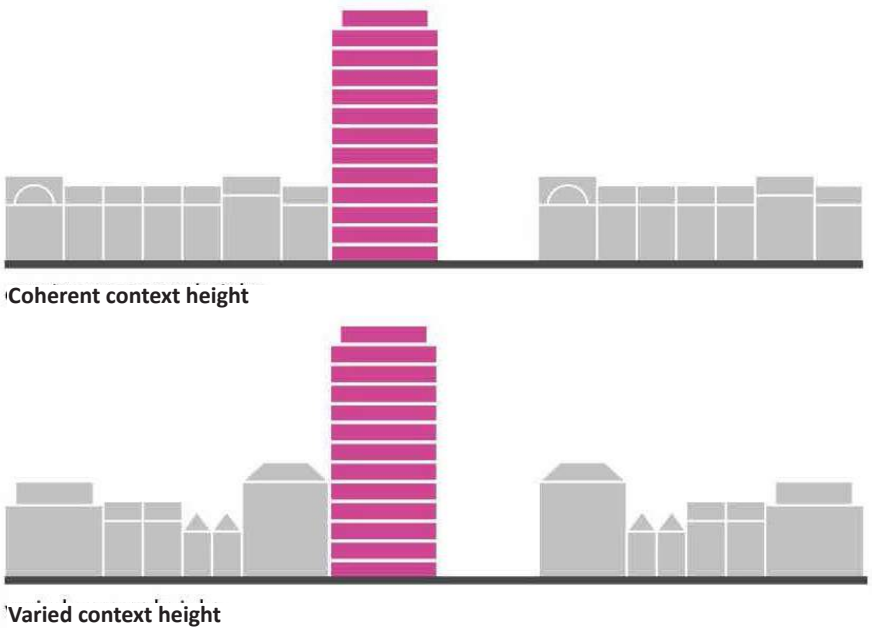


Figure 4.5: The impact of a tall buildings within an area with coherent context height is greater than in an area with varied context height

HEIGHT PROPORTIONATE TO IMPORTANCE

With increased height, in relation to the context, comes increased prominence and the potential for greater impact. This prominence should be meaningful and serve a role in enhancing the legibility of a place. It follows that height should be proportionate to the relative importance of a place or function in the wider city.

The term 'landmark' is chosen deliberately. A taller building will have a greater visibility, a significant impact on its surrounding, and should help to improve the legibility of an area, defining a point of townscape interest or marking a public function or facility, such as a hospital or transport hub.

Landmark buildings attract people, help orientation and contribute to local identity. Well-designed local landmarks can be a positive feature of new developments within a place if they integrate well with their context, respond appropriately to the setting of heritage assets and the landscape/townscape character, and contribute to the sense of place.

Historically in cities and towns tall buildings were associated with a clear meaning. The landmarks that stood out were symbols of public life; they advertised civic priorities and made palpable the hierarchy of public institutions. Churches, palaces, city halls, and later industrial buildings and infrastructures signifying industrial progress, were allowed to dominate the skyline while ordinary development did not compete with these landmarks. Culturally we remain wired to associate greater height and massing with civic importance.

Legible towns or cities are those where the prominence of tall buildings correspond to a clear meaning either by marking special places in the urban fabric or by having a particular, important function. The height of tall buildings should be proportional to their civic importance or function for the wider city or town.

This role of a tall building therefore changes dependent on its classification:

- **Large/higher building** – a local accent or high point enhancing local legibility by subtly emphasising an important corner, local space or site entrances;
- **Local Landmark** – a prominent exception to the height context that marks a special location in the townscape, such as a strategic gateway, transport hub, vista or public space;
- **District Landmark** - a dominating and imposing building that stands out from the wider context to mark a place and /or function that is of district wide importance, such as a strategic infrastructure node or major public institution and where there are clear benefits for being marked on the skyline; and
- **Metropolitan Landmark** – a building that has a profound impact on the city skyline, is visible from far afield and has a jarring contrast with the area in which it is located. Marks a place or function of metropolitan importance for instance a commercial or city centre, or the centre of a tall buildings cluster.

In reference to the building height classification Figure 4.6 sets out the principal perception of a tall building in relation to its context, and its principal impact on the skyline.

It is recognised that other contextual factors may also influence how the relationship of a taller building with its context is perceived. These include for example the local topography, the variation in the context height, the form, scale and roofscape of surrounding buildings, other tall buildings in the vicinity, the location of the tall element within the street block, the structure of the area and from where the tall building can be seen. For simplicity these factors are not included in the concept.

Generally the relationship of a tall building with its surrounding will change gradually as its height increases. It is recognised that there may be an overlap at the classification thresholds where buildings can be perceived as part of both adjoining classifications (for example as a Local Landmark as well as a District Landmark). In many cases however, it will be clearly possible to define a proposed building in one particular classification only.

TALL BUILDING CLUSTERS

A cluster of tall buildings is formed when several tall buildings are co-located in a confined area, such as a town centre or a Central Business District. Clustering of tall buildings can create powerful and distinctive features on the skyline.

For clusters to establish and remain distinctive they require management and coordination in respect of the location and height of potential tall buildings. Competition between sites for the ‘tallest’ building may shift the centre of gravity and affect the reading of a cluster on the skyline. Tall buildings proposed outside a cluster can weaken its strength and legibility on the skyline. If not carefully managed clusters can easily mutate into an uncoordinated sprawl of taller buildings over time, and undermine the impact and reading of the cluster on the skyline.

Ideally the tallest building is situated towards the centre of a cluster. The height of other taller buildings should decrease the further they are away from the centre and this reduces impact of the cluster on adjacent lower height areas.

Tall buildings clusters can help to create a new character as part of planned and comprehensive approach to regeneration and place making and clusters will normally be composed of mid rise (local landmark) and high rise (district landmark) buildings.

Context Height Ratio (coherent /varied)	Building height classification	Perception in relation to its context	Visual impact on the skyline	Potential location
Up to 2	**Large/higher building**	Large/Higher building establishes a localised high point. Building is more notable within a setting of consistent height, and less notable where there is a greater variation in the context height for example along corridors	Higher building is of limited visibility and its significance is local.	To mark a locally important location or use for instance a street corner or local node or a building of civic, institutional or leisure use.
2 - 2.5 / 2 - 3	**Mid-rise (Local Landmark)** Tall building of local significance	Tall building establishes a prominent exception within its context, yet may be perceived as constituent part of the context.	Tall building is outstanding, yet its impact on the skyline is mainly local.	To mark special locations in the townscape, such as a strategic street corner, a public space or a particular function, such as a station.
2.5 - 4.5 / 3 - 5	**High-rise (District Landmark**) Tall building of district wide significance	Tall building is markedly outstanding and establishes a pronounced contrast with its context.	Tall building is highly visible and notably affects the skyline on a district wide scale.	Limited to locations that are of district or borough wide importance, such as strategic infrastructure nodes or public institutions.
> 4.5 / 5	**Super-tall (Metropolitan Landmark)** Tall building of metropolitan significance	Tall building establishes a jarring contrast which is disconnected from the prevailing urban context	Profound and transformative skyline impact, can be seen across the city and from the surrounding areas	Confined only to areas in the Central Activity Zone that have a London wide strategic importance and form part of a high intensity employment cluster (not appropriate in Westminster).

Figure 4.6: Table indicating principles of height relativity and tall building classification for Westminster

Portland House is one of Westminster's tallest buildings

5 WESTMINSTER SPATIAL OVERVIEW

5.1 INTRODUCTION

Understanding the historic evolution of Westminster is critical to an appreciation of the place as it is found today. Westminster is home to Parliament, the Queen's ceremonial residence, Westminster Abbey and Cathedral and to London's West End. It is also the location for many of London's theatres, galleries, cinemas and to central London shopping, embassies, clubs, institutions and businesses. Some of London's largest parks including Hyde Park and Regent's Park are located within Westminster.

The City of Westminster is layered with history and this is reflected in the buildings, the uses and the spaces. These form an important part of London's and indeed the UK's cultural identity and collective memory. For many people Westminster is London.

Westminster's history and heritage means that the majority of the Borough is designated as Conservation Area. It includes over 200 Grade 1 Listed Buildings and nearly 400 Grade II* Listed Buildings, 21 Historic Parks and Gardens (including Regent's Park, Kensington Gardens, and Hyde Park) and a World Heritage site (The Palace of Westminster and Westminster Abbey).

Westminster is one of the most densely populated boroughs in London and in common with other boroughs it continues to evolve and change.

This section of the report describes both the evolution of Westminster, its context, spatial structure, height characteristics and the sensitivity to change.

5.2 HISTORIC DEVELOPMENT

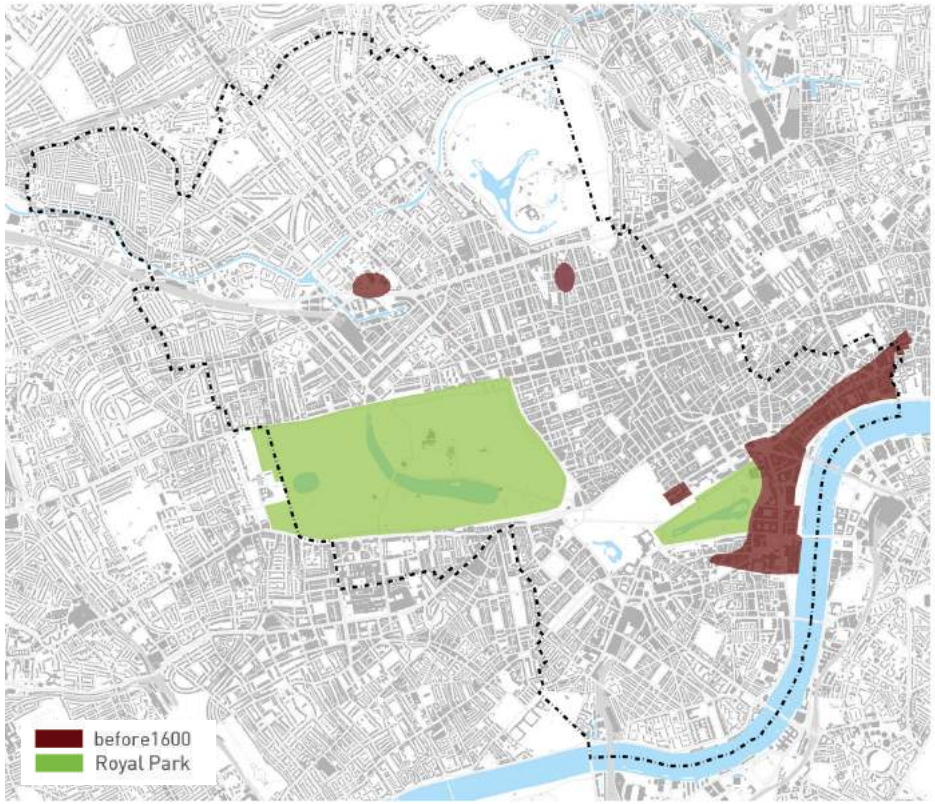


Figure 5.1: Historic development - Westminster up to 1600

Up to 1600

- 11th Century: A substantial complex of abbey, monastery and royal palace grew up on Thorney Island to the west of the City of London on the site of the 7th / 8th century Church of St Peter;
- Through medieval times Westminster was a rural area with a number of churches set within the landscape (including St Martin in the Fields and St Giles in the Fields);
- St James Hospital was founded in this period and later served Henry VIII as a Royal Palace;
- Westminster grew around its hospitals, abbey and palaces and its inhabitants served these uses;
- The dissolution of the monasteries in the 16th Century released large areas of land for further growth;
- Development remained around Whitehall with a number of smaller rural settlements at Paddington and Kensington; and
- Hyde Park and St James's Park provided Royal hunting grounds.

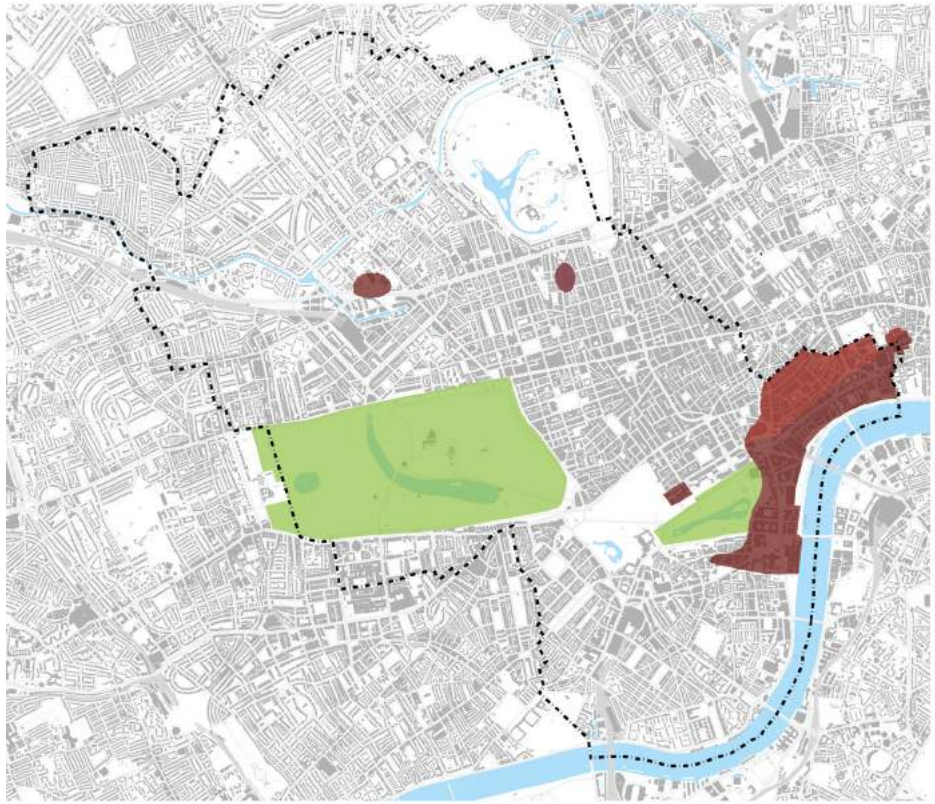


Figure 5.2: Historic development - Westminster 1600 to 1660

1600 to 1660

- London started to expand beyond the City walls and through this period planned development took place at Lincoln's Inn Fields and Covent Garden. Covent Garden included the first square in London;
- Whitehall became the focus of government;
- St James's became a pleasant suburb near the Royal Palace; and
- Hyde Park was opened to the public by Charles I.

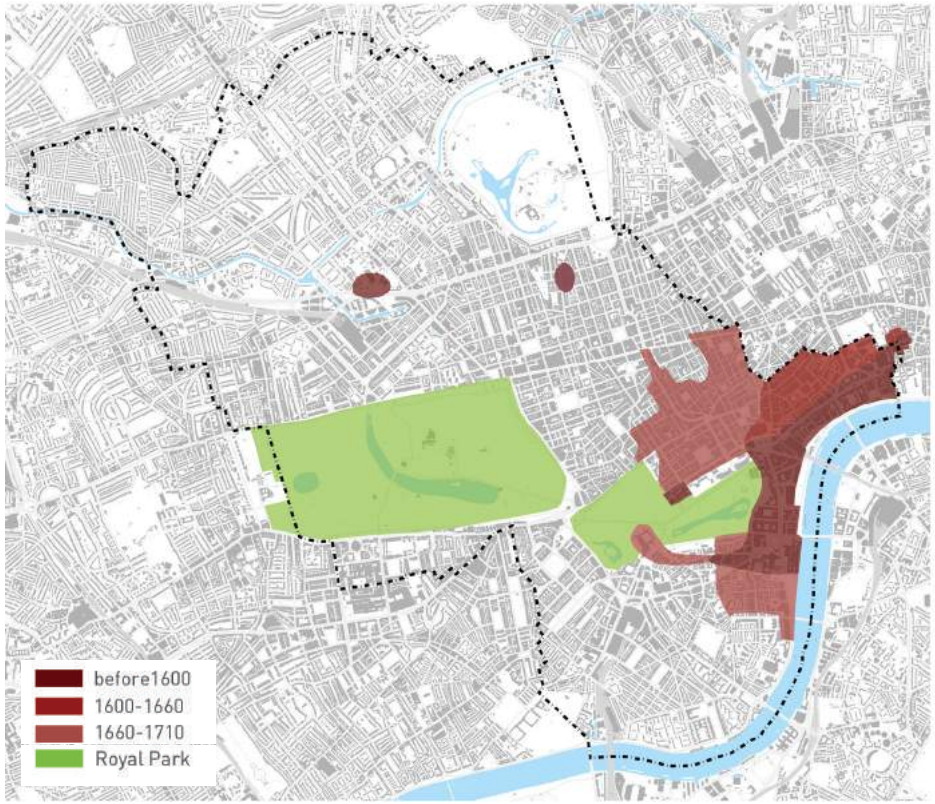


Figure 5.3: Historic development - Westminster 1660 to 1710

1660 to 1710

- A new residential area sprung up near Piccadilly with large mansions including Burlington House and Clarendon House; and
- Soho and Seven Dials were developed in a less ordered layout of narrow streets and modest buildings.

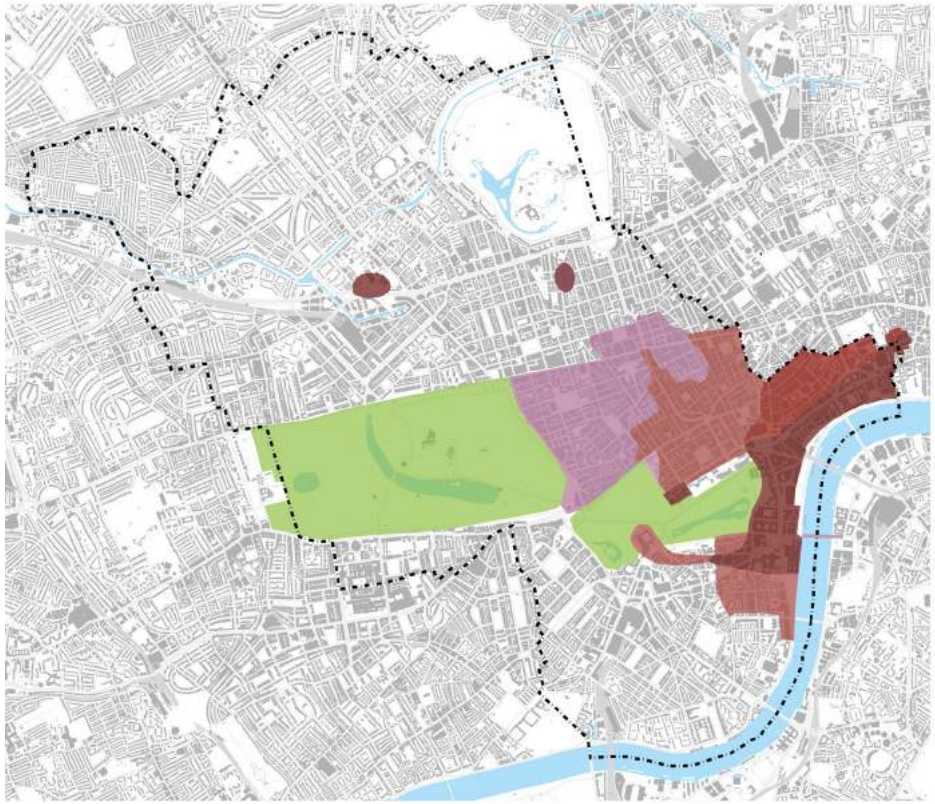


Figure 5.4: Historic development - Westminster 1710 to 1750

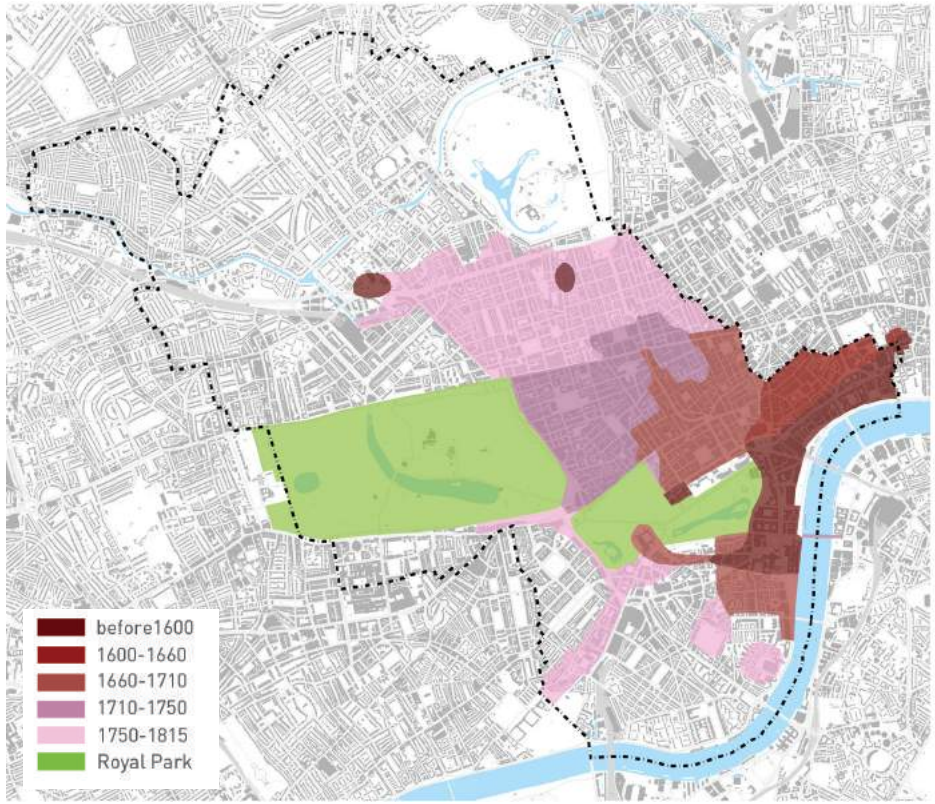


Figure 5.5: Historic development - Westminster 1750 to 1815

1710 to 1750

- Landowners started to develop their estates to the north-west in Mayfair (including the Grosvenor Estate) and around Oxford Street (Cavendish – Harley Estate); and
- Westminster Bridge is constructed between 1739 and 1751 (London's second bridge).

1750 to 1815

- 1756 New Road opened as London's first by-pass (now Marylebone Road and Euston Road);
- Development extends towards New Road and to Paddington with Grosvenor Estate and the Portman Estate developed to either side of Marylebone village;
- 1769 Blackfriars Bridge opens; and
- 1801 The Regent's Canal is opened bringing the Grand Union Canal to Paddington Basin on the outskirts of the built up area.

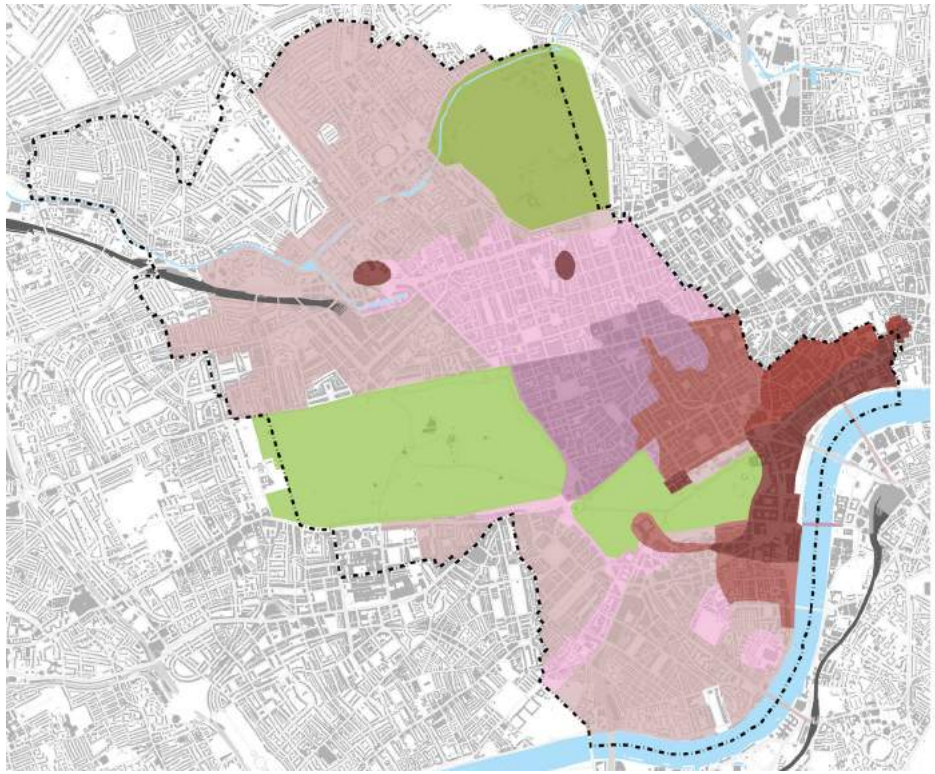


Figure 5.6: Historic development - Westminster 1815 to 1855

1815 to 1855

- A Royal road is constructed from St James's Park to open land to the north, which is laid out as Regent's Park by John Nash. Stucco replaces brickwork as the building material of choice;
- 1821 Buckingham Palace is adapted as the new Royal Palace;
- Westminster becomes even more fashionable and Belgravia is laid out and built within a 20 year period. Bayswater, Pimlico and St John's Wood are rapidly developed during the early Victorian period;
- Vauxhall (1816) and Waterloo Bridge (1817) are opened;
- Regent's Canal is extended to Regent's Park and later linking to the Thames at Limehouse (1820);
- 1834 Old Palace of Westminster destroyed by fire. Replaced in 1835; and
- 1838 Paddington Station opens.

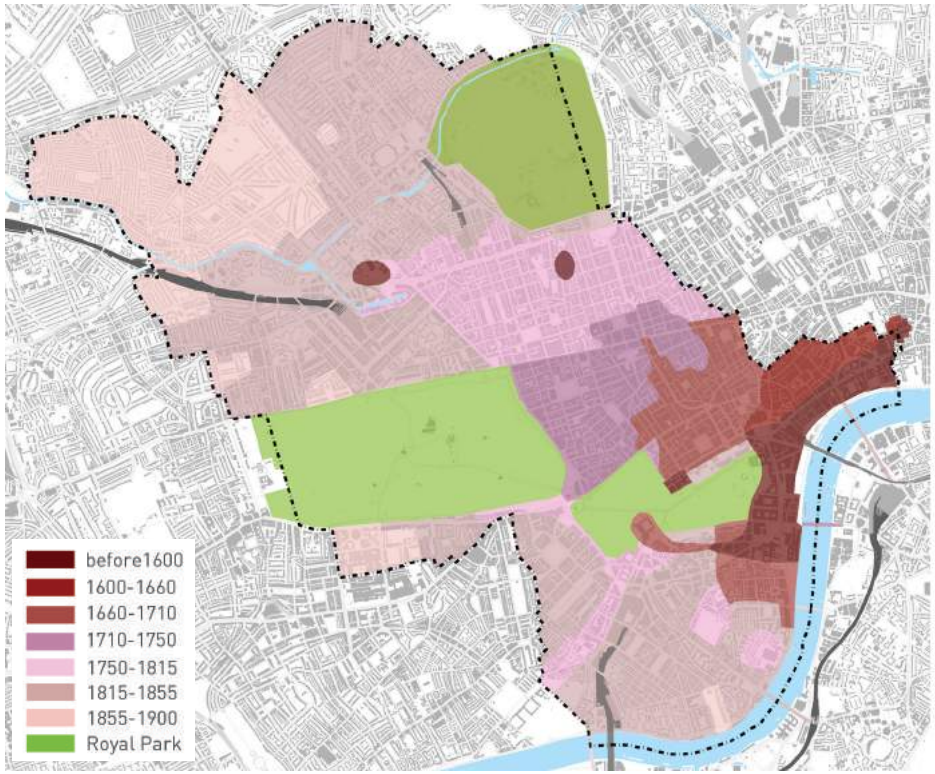


Figure 5.7: Historic development - Westminster 1855 to 1900

1855 to 1900

- Development of Queens Park in West Kilburn begins in 1870s with more modest brick built houses;
- 1860s Victoria Embankment constructed;
- 1860 Victoria Station opens;
- 1863 Charing Cross Station opens;
- 1890s Marylebone Station opens requiring significant clearance of buildings within St John's Wood; and
- Several streets including Victoria Street, Shaftesbury Avenue, Charing Cross Road and Kingsway cut through the city demolishing slums and providing opportunity for new development.

20TH AND 21ST CENTURY

- Changing social circumstances meant larger properties often sub-divided into flats, converted to hotels, offices or embassies or redeveloped;
- Intensification of sites for office uses in Victoria, Euston Square and Millbank in 1960s and 70s;
- 1960s Euston Road widened and the Westway constructed as an elevated highway extending from Paddington to North Kensington (opened 1970);
- Relatively little bomb damage but slum clearance led to social housing areas being developed in Pimlico, Church Street area and Westbourne Green, sometimes including tall residential buildings;
- Changing nature of employment has led to a mixed-use district establishing at Paddington Basin; and
- Increasing pressure for intensification notably in Paddington and Victoria.

CLOCKWISE FROM TOP: Millbank - Westminster's tallest building at 119m; Parsons House on Edgware Road and the Warwick Estate and Westway in Westbourne Green

5.3 STRATEGIC LOCATION

Westminster is located immediately to the west of the City of the London with the River Thames forming its southern edge and with the Royal Borough of Kensington and Chelsea to the west and the London Boroughs of Brent and Camden to the north. Westminster shares the river frontage with the London Boroughs of Wandsworth and Lambeth to the south.

The southern portion of Westminster is located within the Central Activity Zone and borders on the City of London. The northern portion is more residential in character.

Tall building clusters have established in neighbouring boroughs and are visible from vantage points within Westminster. These include clusters at Nine Elms within LB Wandsworth, at Vauxhall and at Waterloo within LB Lambeth, Euston Square within LB Camden and the 'City' around Fenchurch Street / Bishopgate in the City of London.

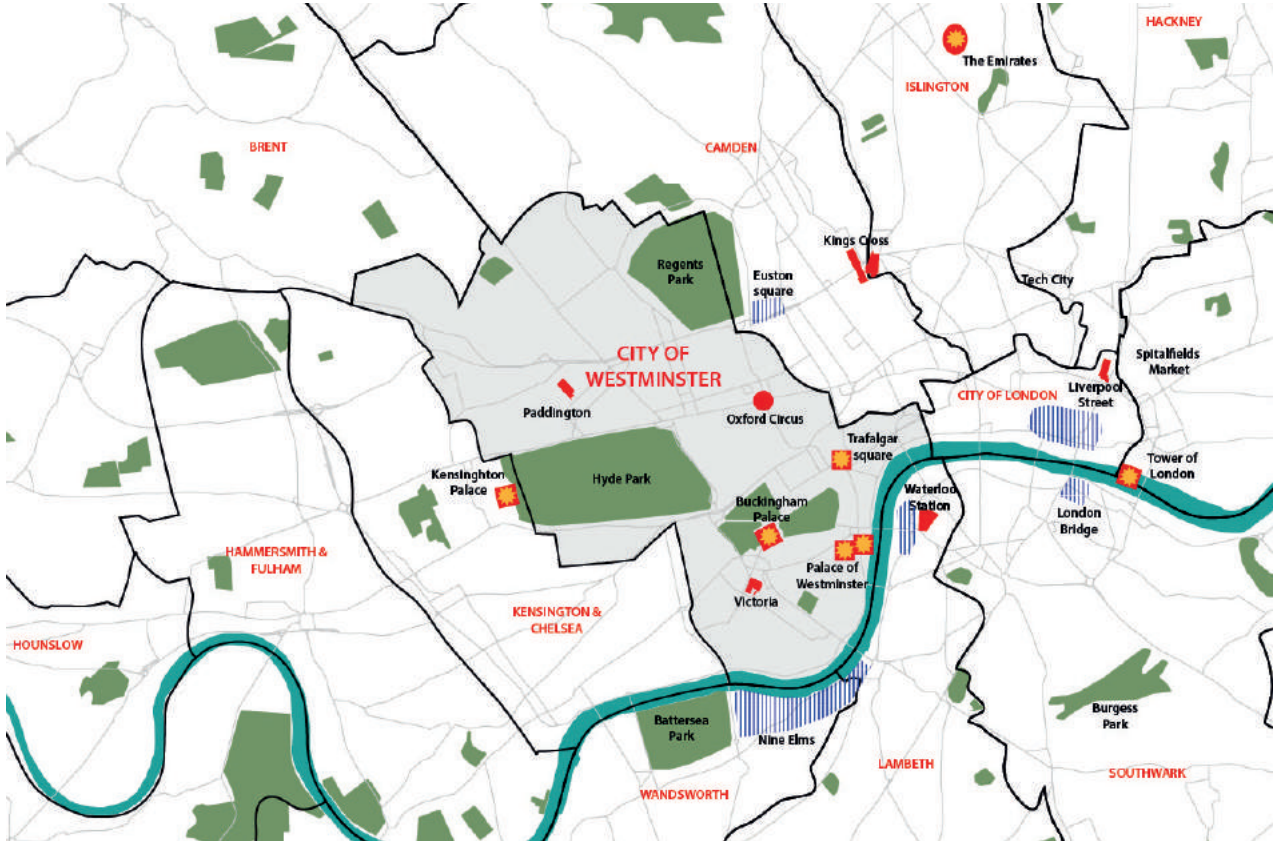


Figure 5.8: Strategic location and relationships

5.4 SPATIAL STRUCTURE

CONNECTED STREETS

The spatial structure in Westminster is composed of a number of connected street grids. In places the street grid is highly formalised with a regular grid of urban blocks (for instance in Marylebone, Fitzrovia and Belgravia), in other places the structure is more organic with irregular blocks that are sometimes sub-divided by alleyways (for instance in Covent Garden and Victoria). To the north and west, in West Kilburn, St John's Wood and Westbourne Green, the blocks become longer and narrower. The alignment of the grids varies and warps in response to natural and man-made features including the River Thames, the Regent's Canal and Paddington Basin and the Royal Parks. This pattern and the scale of blocks reflects the evolution of the city and the building typologies prevalent at the time of construction and whilst many areas have experienced incremental change the historic fabric strongly informs the character of the different parts of the Borough.

OPEN SPACE

Westminster's green spaces are unique with five Royal Parks providing public open spaces of immense historical importance and national and international significance and parks and gardens, including many of London's Squares, forming an intrinsic part of Westminster's neighbourhoods. Whilst many of the squares are private they provide visual amenity, sense of place and identity and through their mature trees help to provide shade, cooling and improve air quality. Many of the spaces are also important for nature conservation and have been designated accordingly.

CORRIDORS

The block structure also influences the movement pattern in the borough with the main streets defined by their greater width. Four main corridors extend east-west through the borough:

- The Westway (A40) / Euston Road (A501) corridor extending across the borough from west London to Euston and Kings Cross and St Pancras International in the east;
- The Bayswater Road / Oxford Street corridor which connects Shepherds Bush and Notting Hill to the west along the north side of Hyde Park to the West End;
- The Brompton Road / Knightsbridge / Piccadilly / Shaftesbury Avenue corridor which connects Hammersmith in the west, along the south side of Hyde Park to the West End; and
- The Cheyne Walk / Grosvenor Road / Millbank corridor which extends along the north bank of the River Thames from Chelsea in the west to Parliament Square and then onwards towards the Tower of London and east London.

North-south routes are generally less well defined and more indirect with the most significant and direct route being the Edgware Road / Park Lane / Vauxhall Bridge Road corridor which extends from Vauxhall Bridge, through Victoria to Marble Arch and along the former Roman Road northwards to St John's Wood and north London.

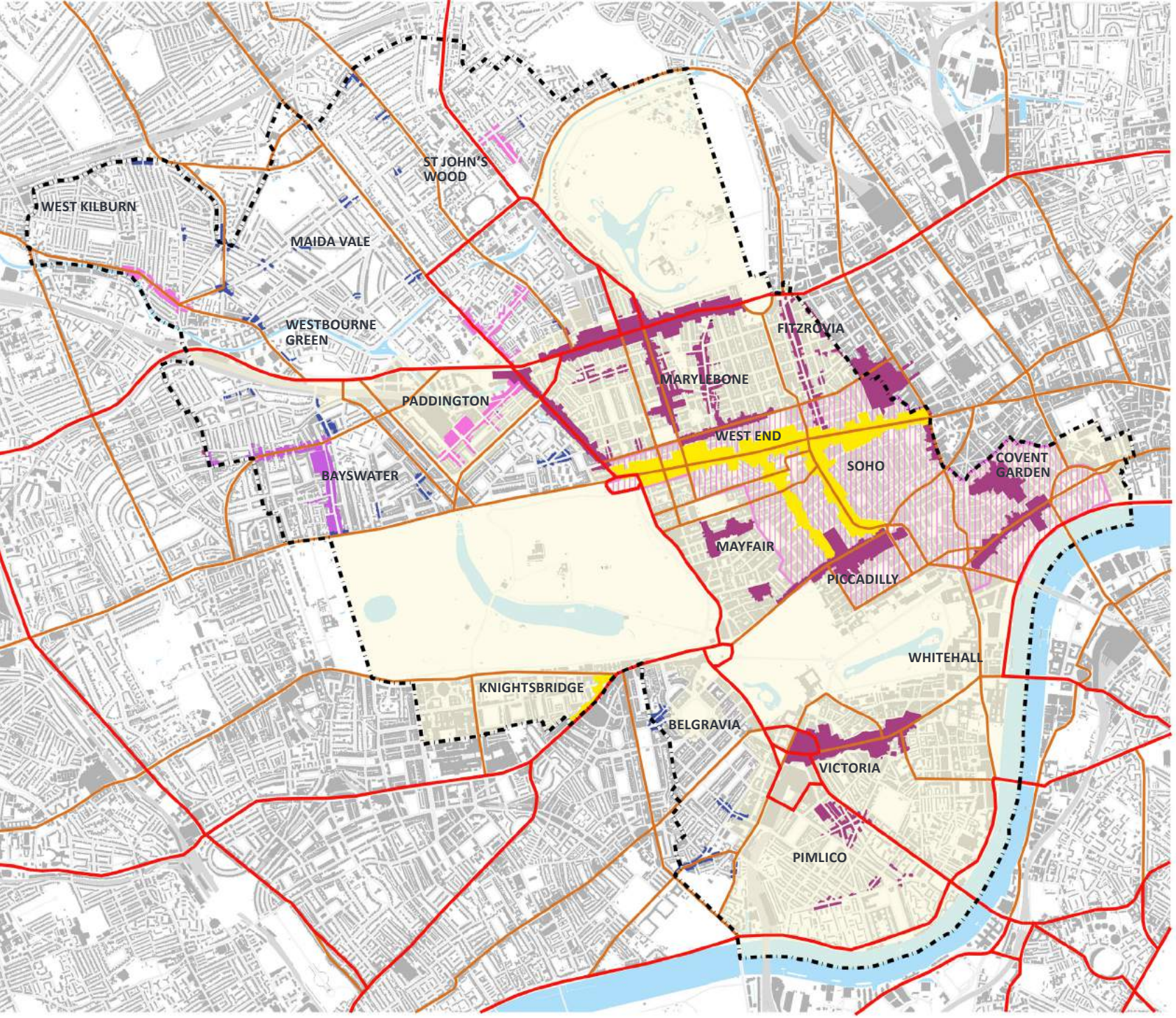


Figure 5.9: Westminster's centres and movement corridors

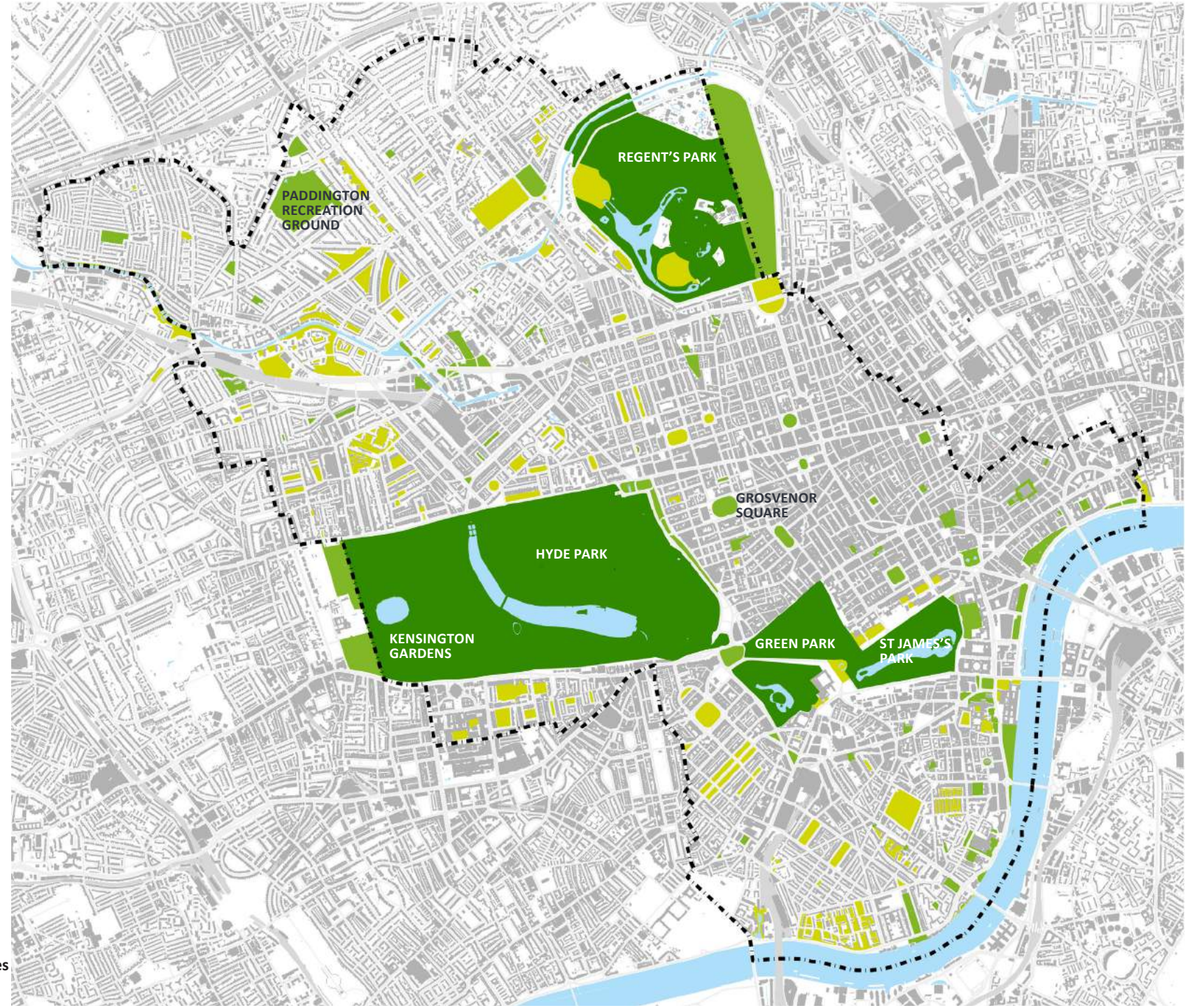


Figure 5.10: Westminster's open spaces

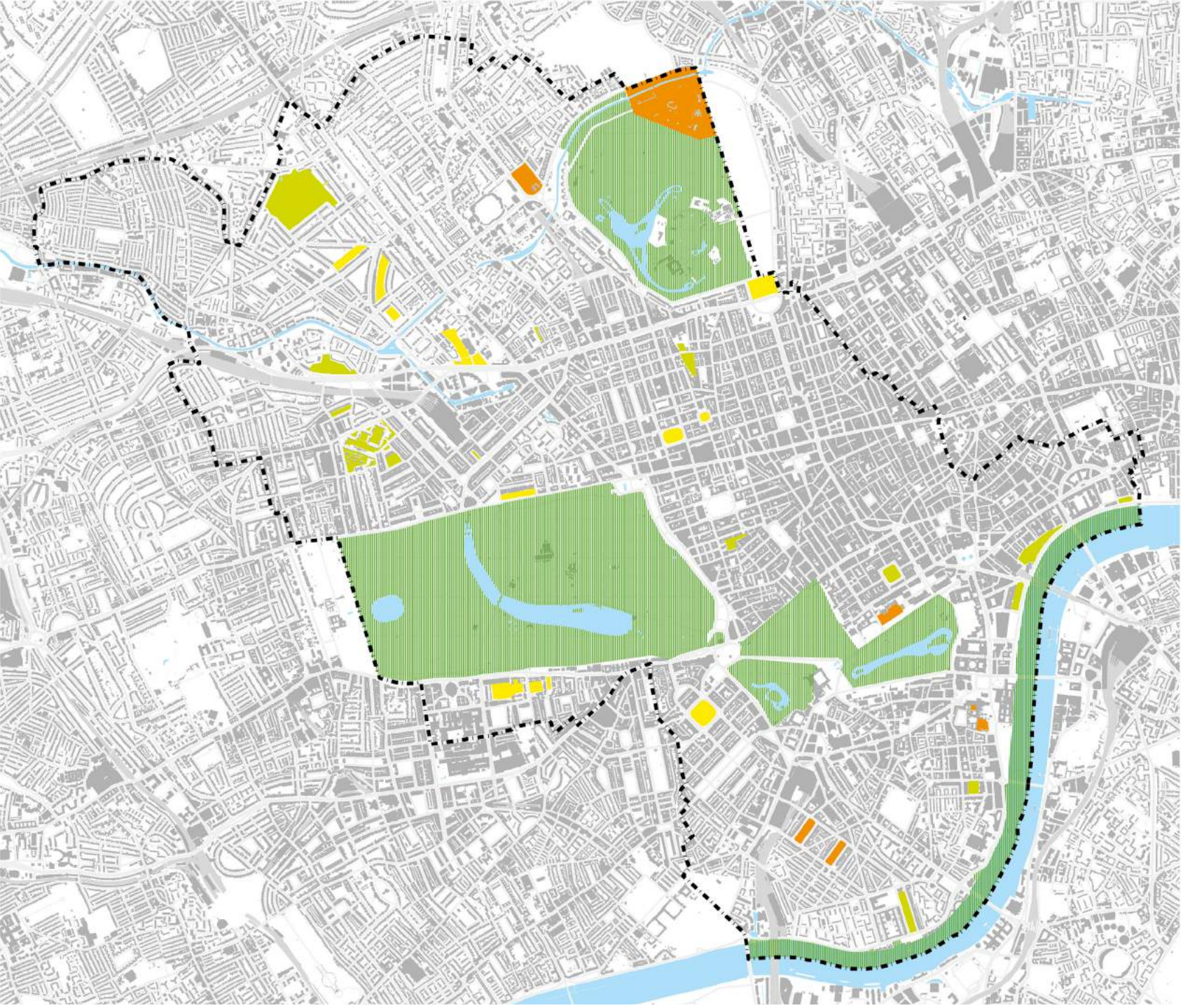


Figure 5.11: Westminster's nature conservation designation

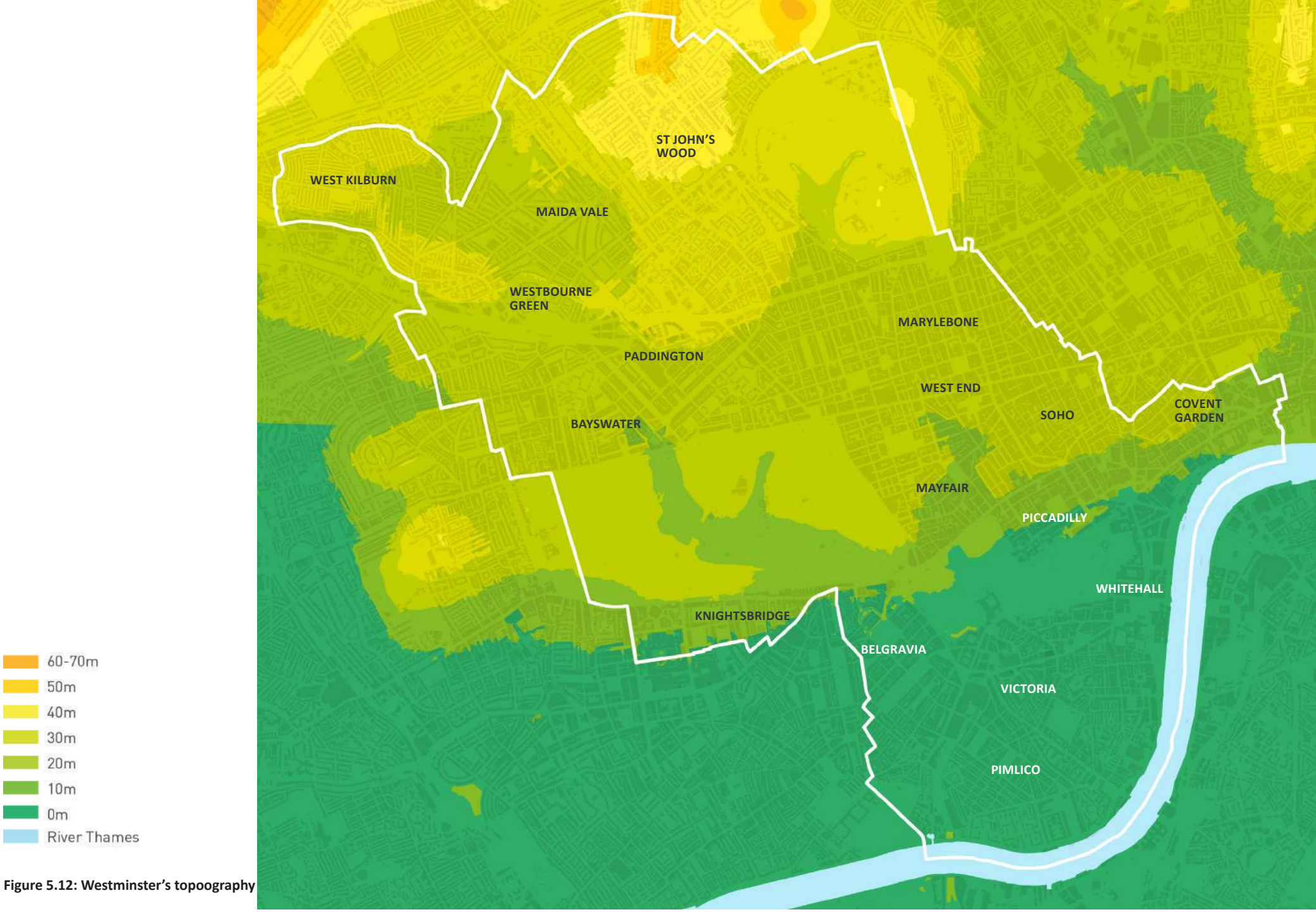


Figure 5.12: Westminster's topoography

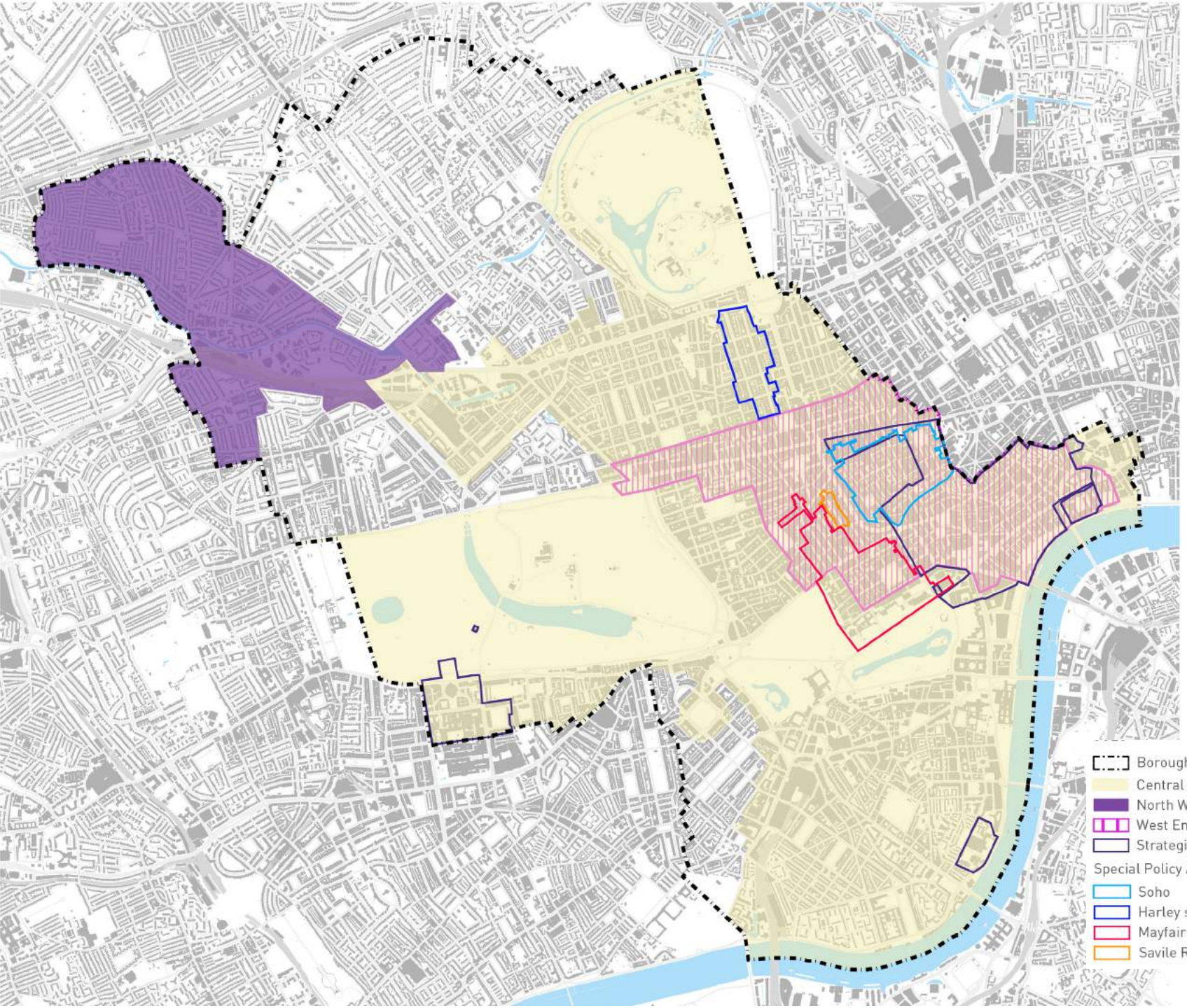


Figure 5.13: Employment uses

USES

As Westminster has evolved it has become one of the most exciting and mixed places in the world. This activity is centred around the West End and includes the nation's largest entertainment centre, London's theatre district and the West End cinemas, and internationally important shopping offer focused along Oxford Street, Regent's Street, New Bond Street and part of Knightsbridge (The International Centre). The West End is a focus for business and provides a rich mix of commercial uses that contribute to central London's wide appeal. It is also home to a substantial residential population.

The Central Activities Zone (CAZ) extends across the southern portion of Westminster encompassing the West End and including Marylebone and Fitzrovia, Knightsbridge, Victoria, Paddington, the Royal Parks and parts of Pimlico. The CAZ is designated through the London Plan, and includes more land in Westminster than any other London borough.

In addition to the CAZ designation there are a number of other policy designations that promote employment based growth or aim to protect distinct places and uses:

- The North West Economic Development Area which promotes the provision of additional employment and commercial floorspace that is suitable for small and medium enterprises;
- The West End Retail and Leisure Special Policy Area which promotes commercial development that secures significant jobs growth, an improved retail and leisure experience and diversification of the evening and night-time economy;
- Special policy areas protecting the special character and uses within the following areas:
  - Soho - small scale mixed use including specialist retail, creative industries, cultural and entertainment uses;
  - Harley Street - medical uses;
  - Mayfair and St James's - art galleries and luxury / niche retail; and
  - Savile Row - bespoke tailoring cluster.
- Strategic Cultural Areas in Millbank, Knightsbridge and the West End

PUBLIC TRANSPORT NETWORK / PTAL

Westminster is well served by public transport with four mainline rail termini at Charing Cross, Victoria, Paddington and Marylebone and all London Underground lines serving the borough.

The Elizabeth Line will serve Westminster with stations at Paddington, Bond Street, and Tottenham Court Road.

The borough is also well served by buses.

The majority of the southern part of the borough has the highest Public Transport Accessibility Level (PTAL) although this reduces towards the north in St John's Wood, Maida vale and West Kilburn and towards the south in parts of Pimlico.

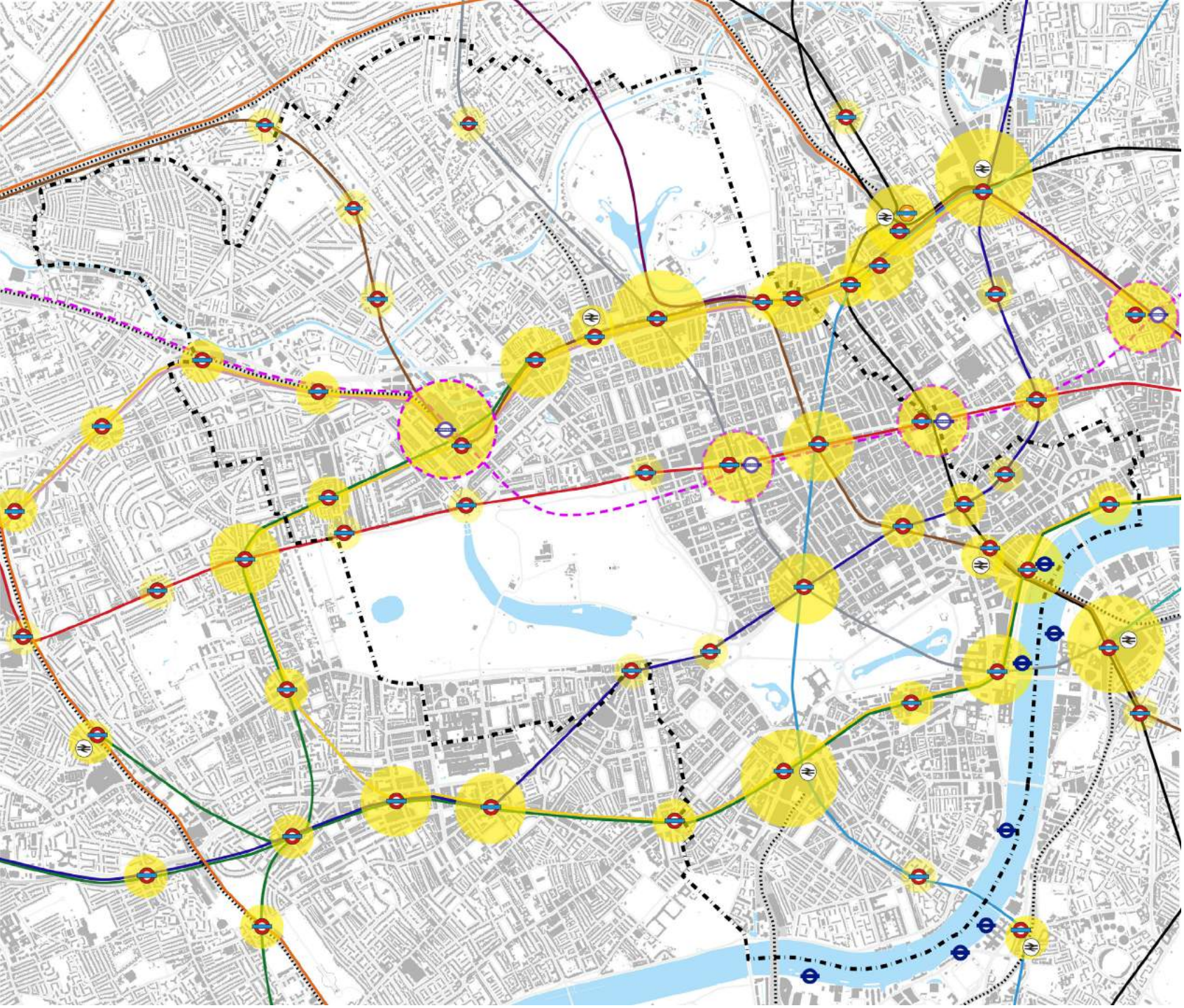


Figure 5.14: Rail services and access

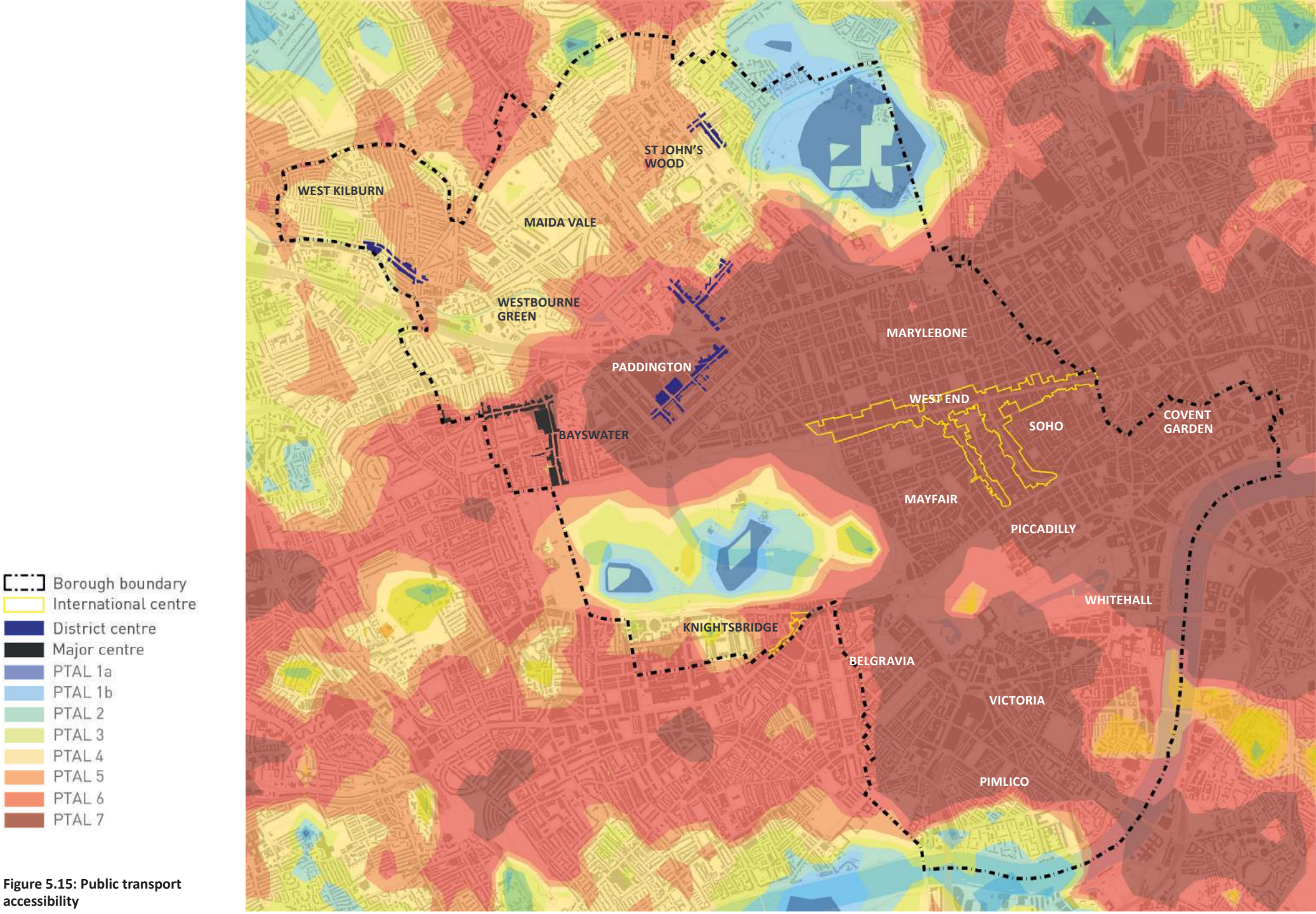


Figure 5.15: Public transport accessibility

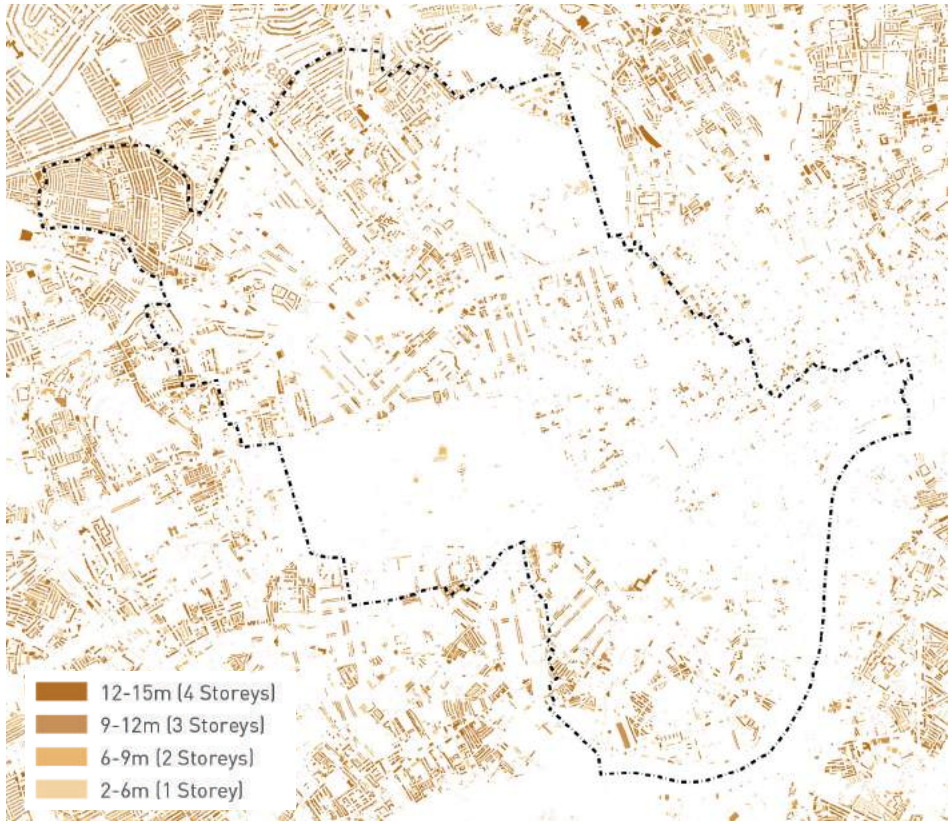


Figure 5.16: Existing low-rise buildings up to 15m / typically up to 4 storeys

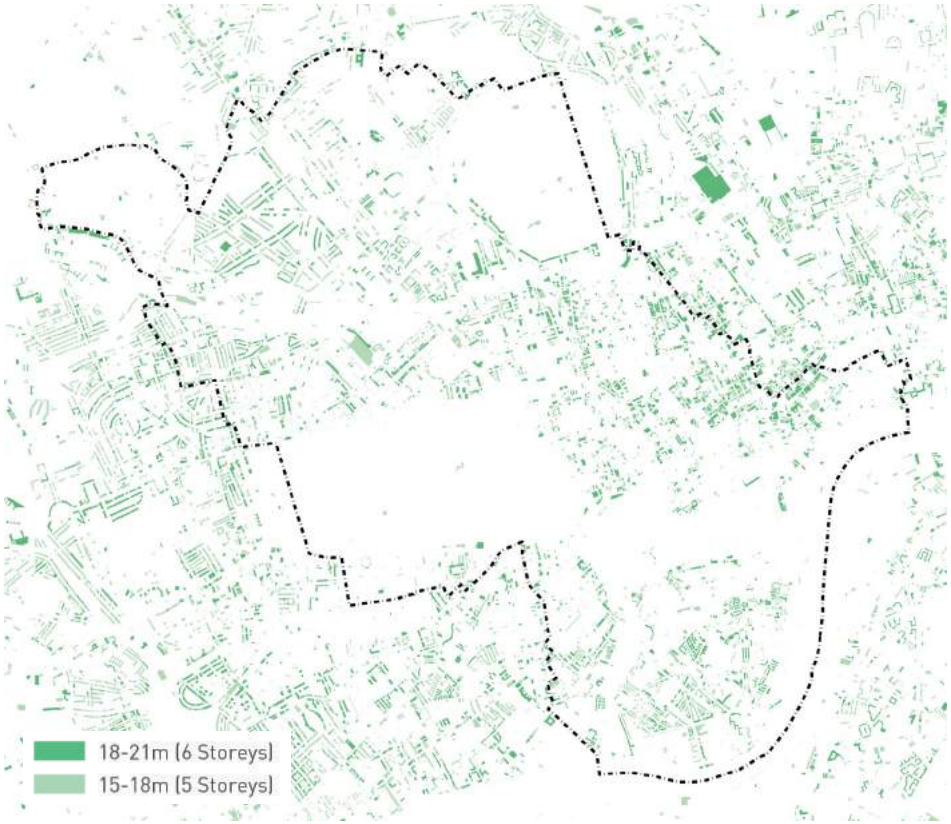


Figure 5.17: Existing buildings - 15 to 21m / typically 5 - 6 storeys

5.5 BUILDING HEIGHTS

The height of buildings in Westminster is strongly linked to the borough's history. In many areas there is uniformity that is derived from the prevailing building typologies that were promoted as an area was first developed.

This is particularly evident in the 18th and 19th century neighbourhoods characteristic of much of the Borough.

In Pimlico, Belgravia, Marylebone, Fitzrovia buildings are typically five and six (although sometimes seven or eight); in St John's Wood and West Kilburn buildings are more modest in scale at three and four storeys.

Building height increases towards the West End with many buildings in these areas rising to nine to twelve residential storeys.

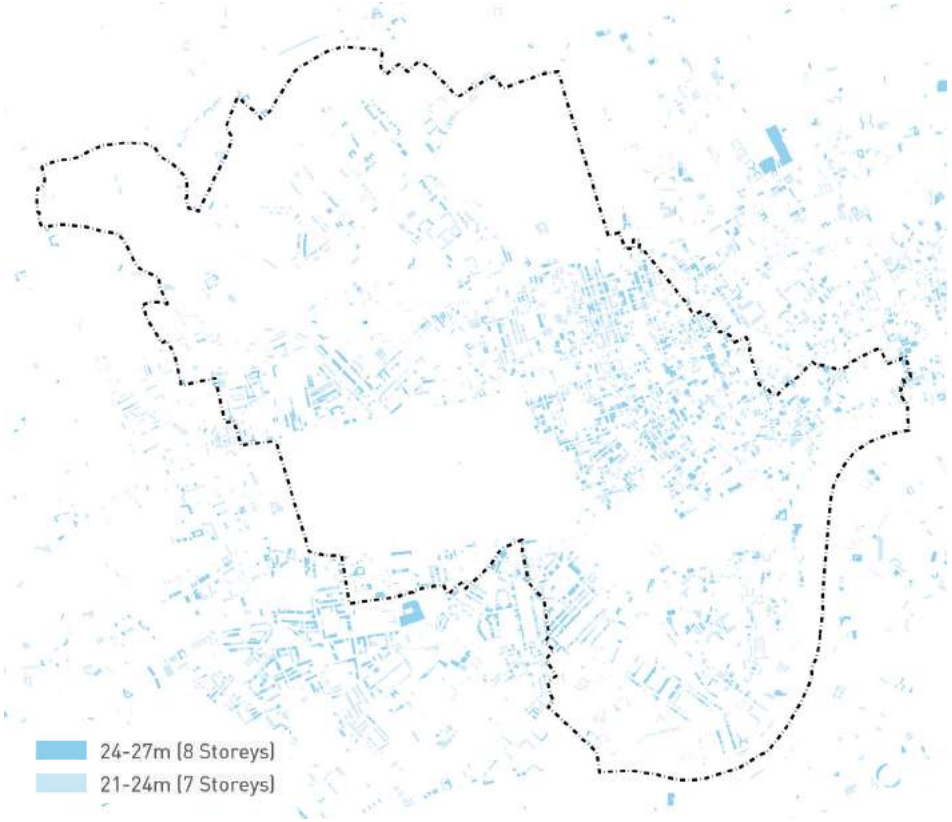


Figure 5.18: Existing buildings - 21 to 27m / typically 7 - 8 storeys

Figure 5.19: Existing buildings - 27 to 39m / typically 9 - 12 storeys

NOTE:

The height maps in the report have been prepared using highly accurate DTM and DSM data sets (based on lidar data), which respectively identify spot heights of the terrain and the surface height of objects. GIS software is then used to establish the difference between the two height sets to identify the height of buildings. Note that when a building polygon comprises both tall structures together with lower building parts, if the OS base does not have these parts as separate polygons, then the height of the tallest element is taken for the whole of the building.

The height diagrams provide a strategic understanding of the typical heights in the borough and do not represent the actual building heights in storeys, which could only be established by detailed site surveys.

Figure 5.20: Existing buildings - 39 to 63m / typically 13 - 20 storeys

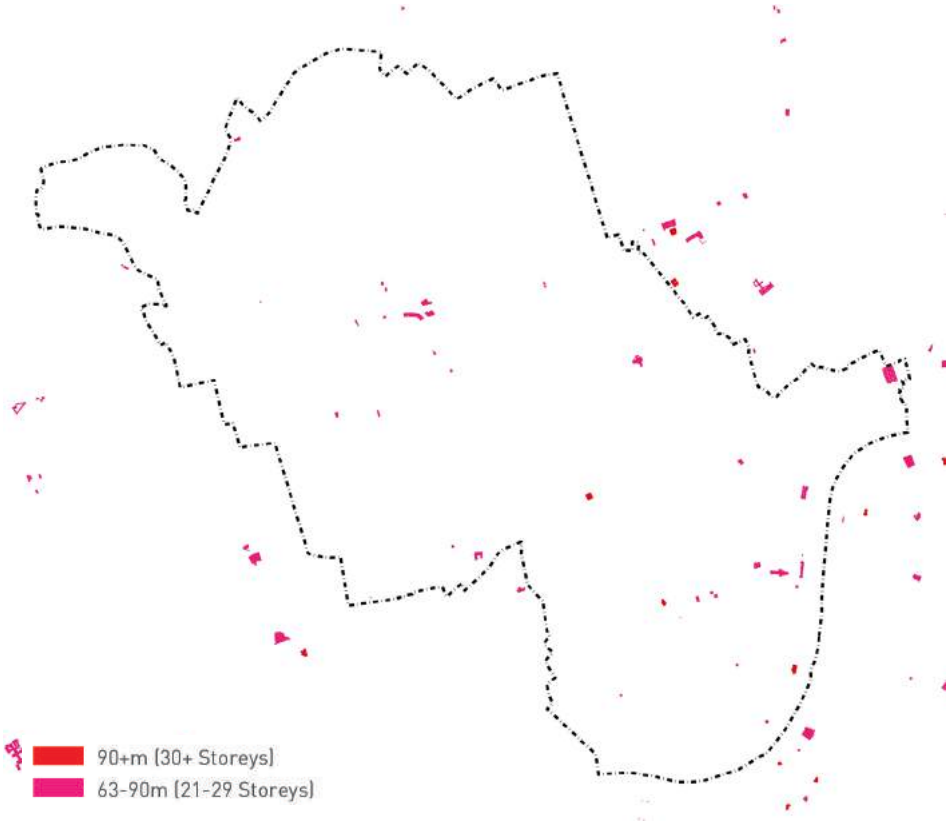


Figure 5.21: Existing buildings - 63m and above / typically 21 storeys and above

Figures 5.20 and 5.21 indicate the location of taller buildings (over 39m in height). On first review these Figures appear to show a fairly random scattering of taller elements across the borough however whilst there are some anomalies mostly dating from the 1960s and 70s when taller residential buildings were in vogue, closer analysis indicates that greater height is concentrated along main corridors (Oxford Street and Euston Road in particular), alongside the river Thames and around the edges of Hyde Park and Green Park. Greater height is also apparent at Paddington and Victoria.

Some of the tallest buildings within Westminster are historic. Victoria Tower on the Palace of Westminster at 102m remains the second tallest building in the City of Westminster. The only other buildings in Westminster that exceed 100m in height date from the 1960s; Millbank Tower (119m), Portland House in Victoria (101m) and the Park Lane Hilton (101m).

These 1960s towers were symbols of their time and not reflective of a more considered response to heritage assets within the borough that has been adopted since that period.

The height characteristics of buildings and neighbourhoods within Westminster are an important component of the character of the area with historic buildings, churches, institutions, and stations continuing to play an important role in marking notable places within the townscape through their massing and height.

Figure 5.22: Existing building heights

5.6 SENSITIVITIES

Westminster's history and heritage are a defining characteristic of the city and make it particularly sensitive to tall buildings. There are a number of statutory designations that cover aspects of Westminster's built fabric. These include:

- A World Heritage Site;
- Protected views;
- Listed buildings and conservation areas; and
- Registered Parks and gardens.

Topography can also lead to sensitivities. Views across Westminster from elevated land to the north of the Borough in particular, impact on the potential for tall buildings in some locations.

WORLD HERITAGE SITE

The Palace of Westminster and Westminster Abbey World Heritage Site which includes St. Margaret's Church is located alongside the River Thames to the south east of the borough.

Objective 1 within the WHS Management Plan is:

'To safeguard the Outstanding Universal Value for which the Westminster WHS was inscribed which are embodied in the buildings, spaces, monuments, artefacts and archaeological deposits within the site, the setting and views of and from it, its iconic status and the activities which take place within the WHS.'

The London View Management Framework protects views of the silhouette of the Palace of Westminster from a number of River Prospect views notably from Lambeth Bridge, Westminster Bridge, Hungerford Bridge and Waterloo Bridge stating in para 257, in relation to River Prospect views from Waterloo Bridge, that:

'Development should not cause adverse impact to the World Heritage Site and should not compromise a viewer's ability to appreciate its Outstanding Universal Value. The Protected Silhouette should not be altered by development appearing in its background'

Similar comments are made in relation to other River Prospect views.

This establishes a backdrop to the World Heritage Site where there is sensitivity to tall buildings (refer to Figure 5.24).

It also sets height restrictions on tall buildings in certain areas so nothing can appear above the protected silhouette.

This is of particular importance given the World Heritage Committee concerns and UNESCO mission visit to the site in 2017.

As part of the management plan review the council is working with adjoining boroughs on 3D modelling to better understand the potential impacts of tall building development around the site both within and outside Westminster.

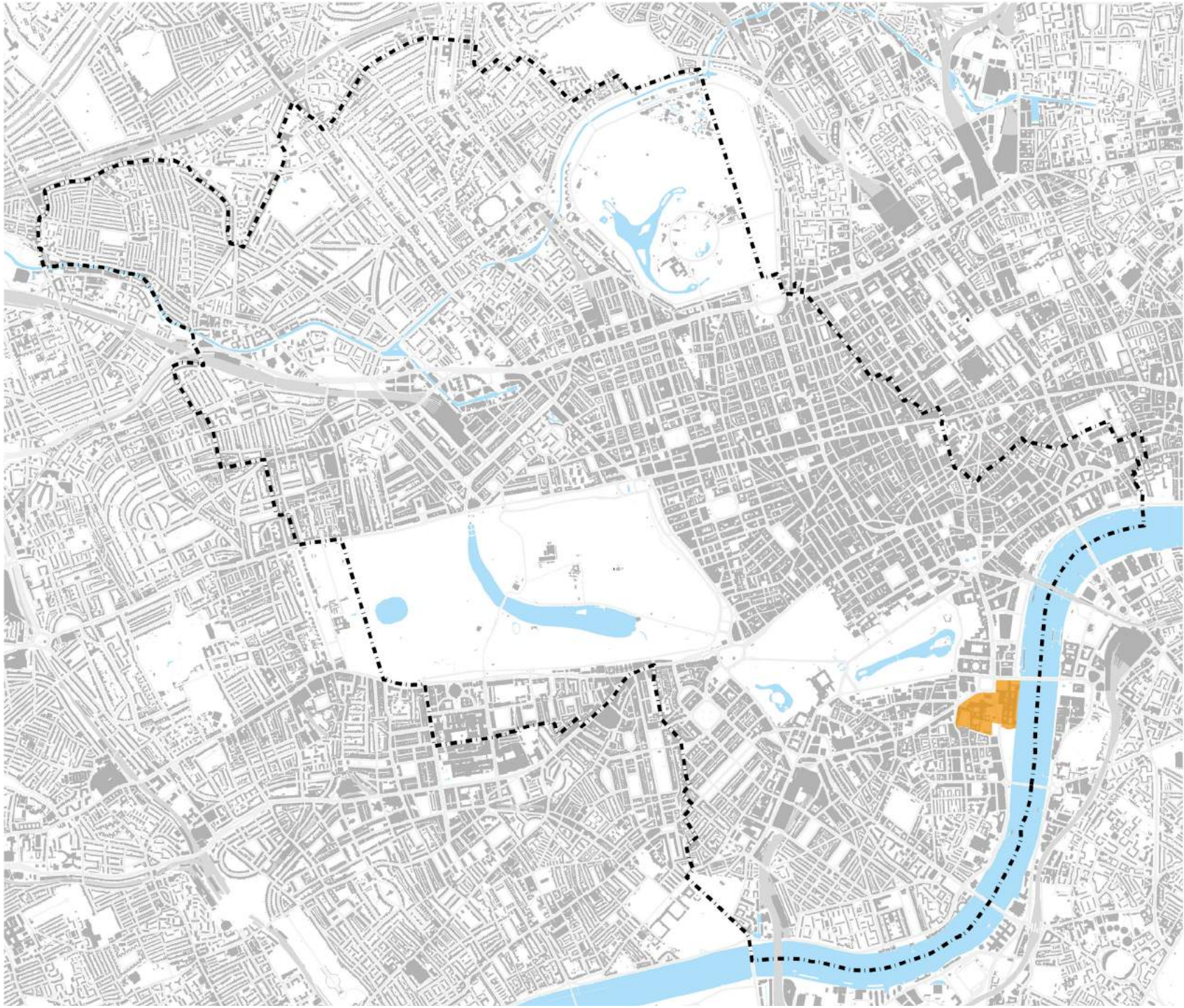


Figure 5.23: World Heritage Site

VIEWS

The London View Management Framework (LVMF) (March 2012) designates and protects a number of views that either originate or extend across Westminster.

Of the 27 views identified in the LVMF, 17 protect views to or from Westminster and the city is crossed by five designated viewing corridors set out in the London Plan (refer to Figure 5.24).

Protected views include:

London Panorama views

- View 2: From Parliament Hill to central London including:
  - View 2A.2: From the summit of Parliament Hill towards the Palace of Westminster; and
  - View 2B.1: From east of the summit of Parliament Hill to the Palace of Westminster.
- View 4: From Primrose Hill to central London including:
  - View 4A.1: From the summit of Primrose Hill to St Pauls (only briefly crosses Westminster in Regents Park); and
  - View 4A.2: From the summit of Primrose Hill to the Palace of Westminster.

Linear Views

- View 7: From the Mall to Buckingham Palace;
- View 8: Westminster Pier to St Paul's Cathedral; and
- View 9: From King Henry VIII's Mound, Richmond to St Paul's Cathedral.

River Prospect Views

- River Prospect 14: Blackfriars Bridge;
- River Prospect 15: Waterloo Bridge;
- River Prospect 16: The South Bank;
- River Prospect 17: Golden Jubilee / Hungerford footbridges;
- River Prospect 18: Westminster Bridge;
- River Prospect 19: Lambeth Bridge;
- River Prospect 20: Victoria Embankment;
- River Prospect 21: Jubilee Gardens and Thames side in front of County Hall; and
- River Prospect 22: Albert Embankment.

Townscape Views

- View 23: Bridge over the Serpentine, Hyde Park to Westminster;
- View 26: St James's Park to Horse Guards Road; and
- View 27: Parliament Square to Palace of Westminster.

These views are sensitive to tall buildings and restrict the potential locations for tall buildings across the borough. In particular there are viewing corridors that extend across the West End including the Tottenham Court Road Opportunity Area and across Victoria and the Victoria Opportunity Area.

There are also a number of locally identified views that are of metropolitan, national and international importance.

LISTED BUILDINGS, CONSERVATION AREAS AND REGISTERED PARKS AND GARDENS

Westminster's rich heritage is reflected in the number of listed buildings conservation areas and registered parks and gardens.

There are 56 Conservation Area designations in Westminster covering 78% of the borough's land. Westminster has in excess of 11,000 listed buildings (one of the highest concentrations of any local authority in the country). Over 200 are Grade I listed and nearly 400 are Grade II* listed; the remainder being Grade II.

There are also 23 registered historic parks and gardens, which include the Royal Parks and there are three scheduled ancient monuments and 16 areas of archaeological priority.

Figure 5.24: Strategic Views

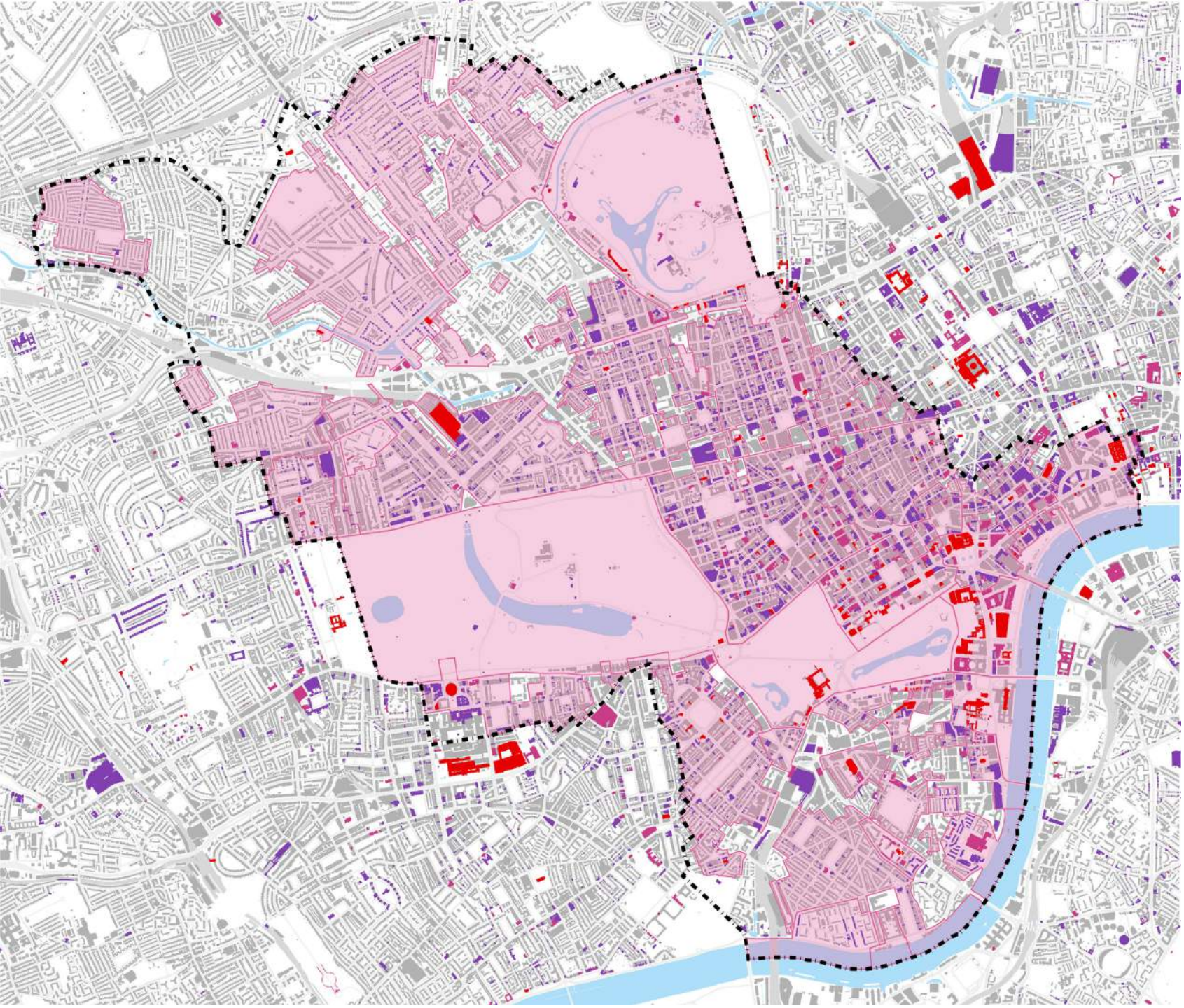


Figure 5.25: Conservation Areas and Listed Buildings

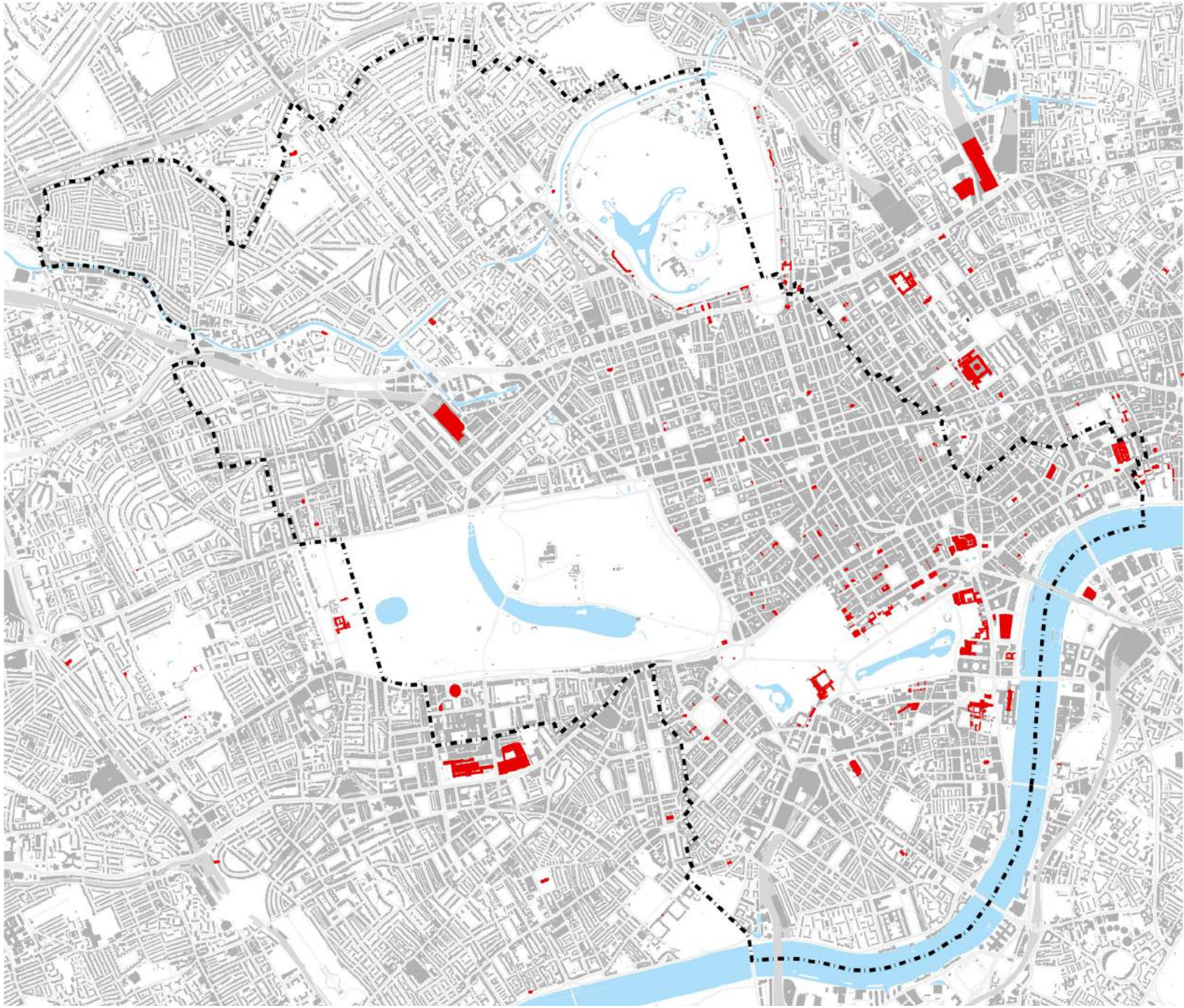


Figure 5.26: Grade 1 Listed Buildings

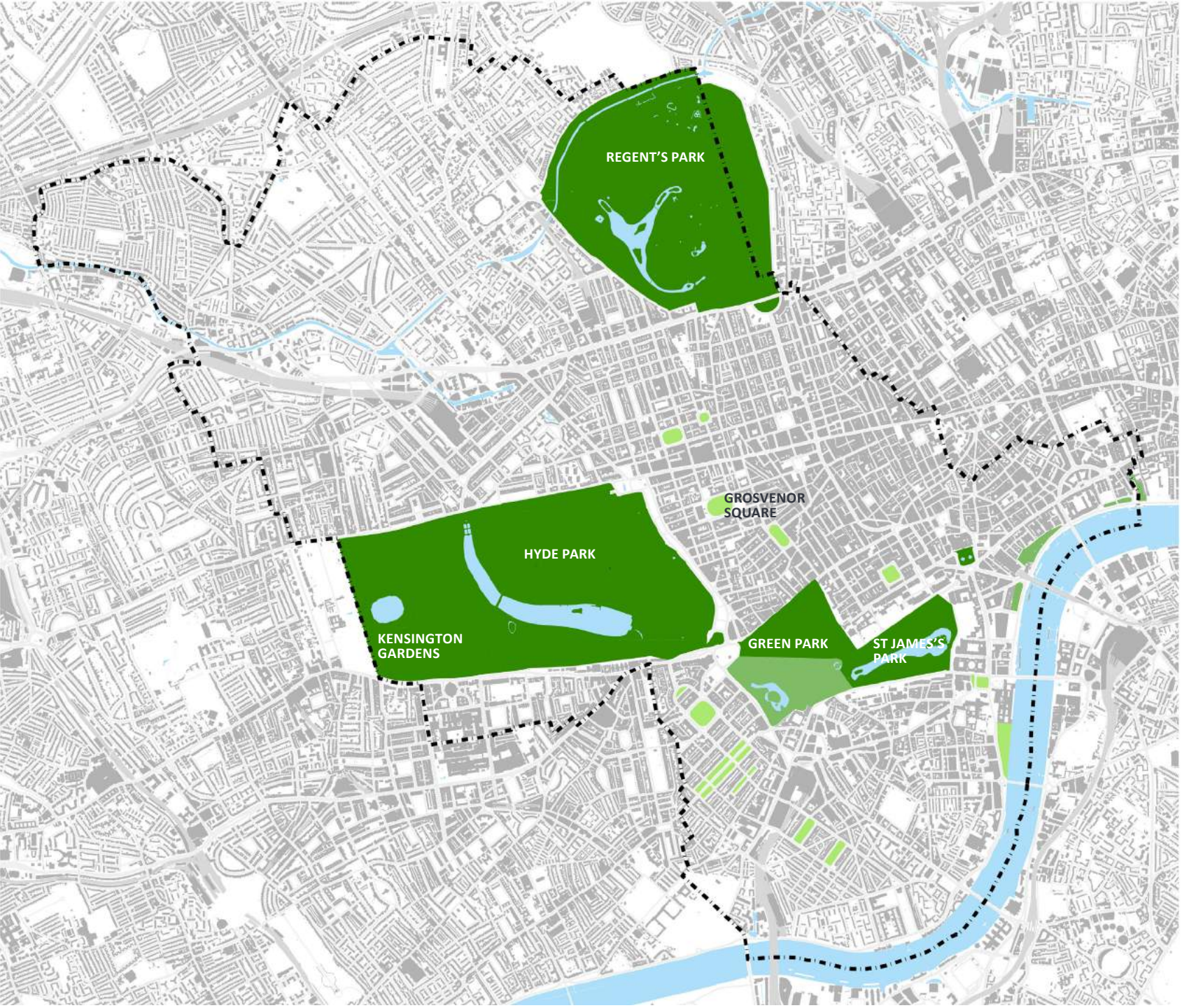


Figure 5.27: Registered Parks and Gardens

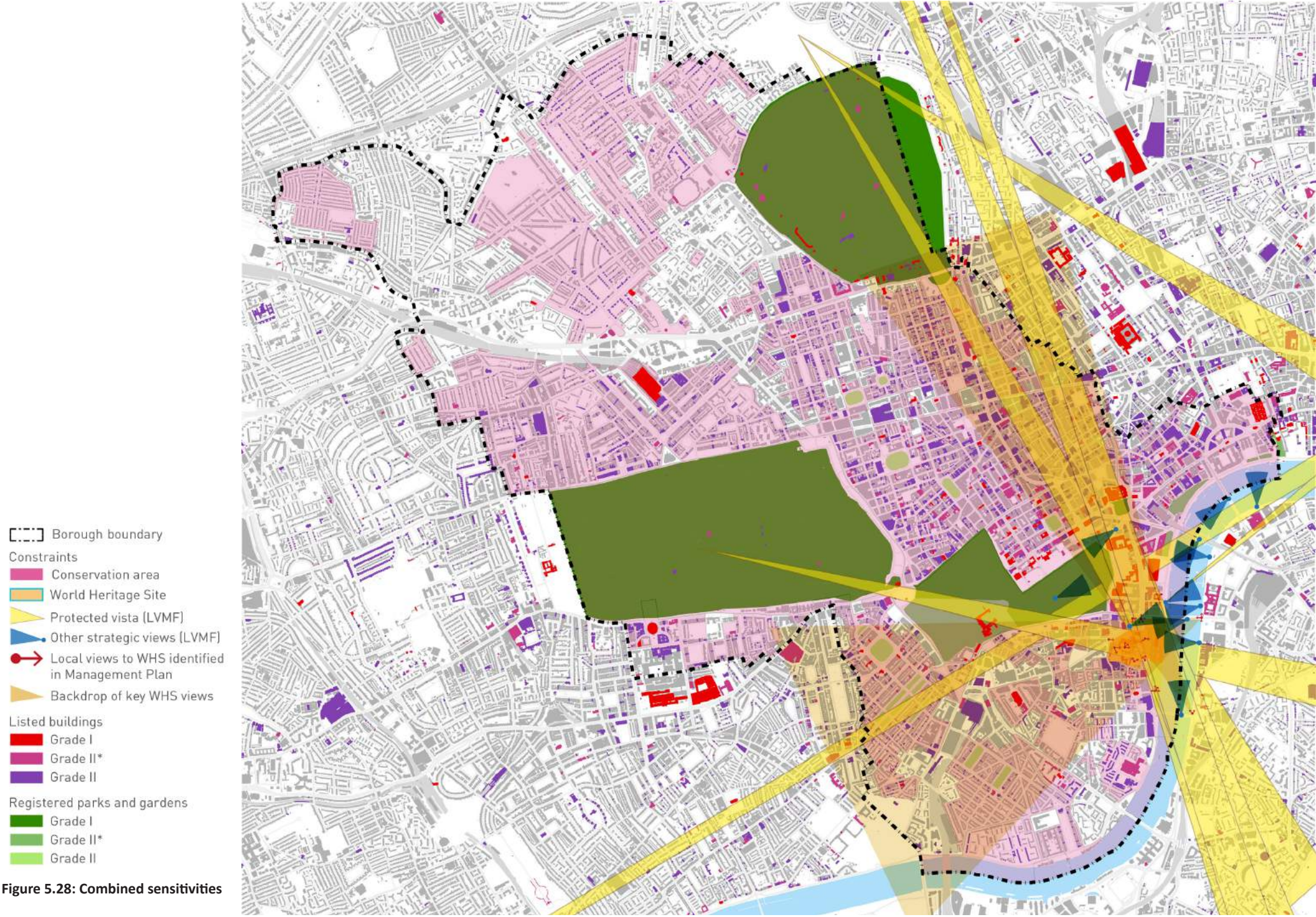


Figure 5.28: Combined sensitivities

Tall buildings under construction on Victoria Street

6 WESTMINSTER DEVELOPMENT PRESSURE AND CHANGE

6.1 DEVELOPMENT PRESSURE

The character and heritage sensitivities within Westminster has restricted opportunity for tall buildings however in recent years the City has seen a number of proposals for higher or tall buildings.

Tall buildings have been primarily focused in the Paddington and Victoria Opportunity Areas but applications for large and tall buildings, have also been approved in Bayswater, St John's Wood and the West End.

Significant recent applications are documented on the following pages. This list may not be comprehensive but nevertheless provides a good indication of the pressure within different parts of the borough.

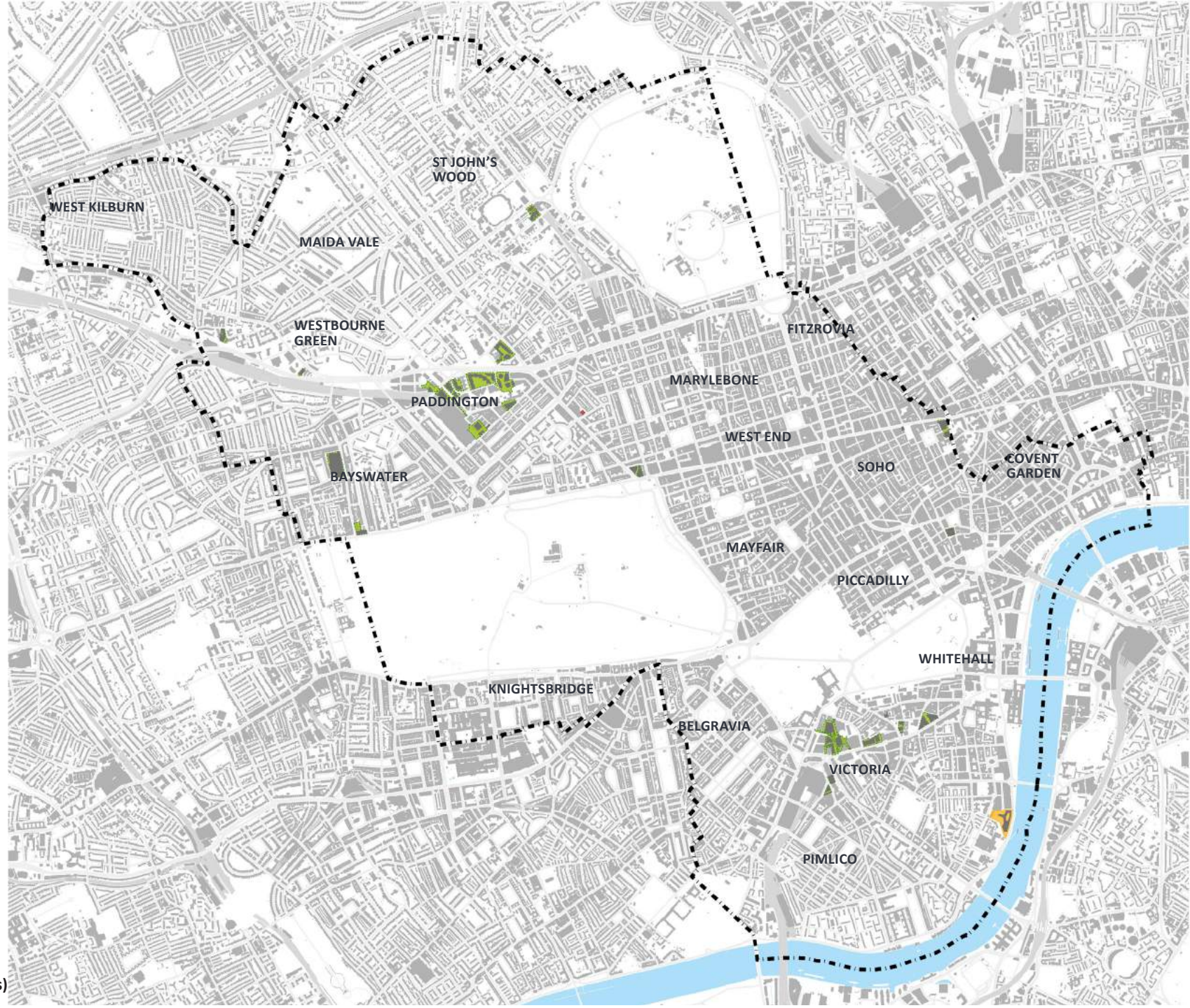


Figure 6.1: Significant planning applications (including taller buildings)

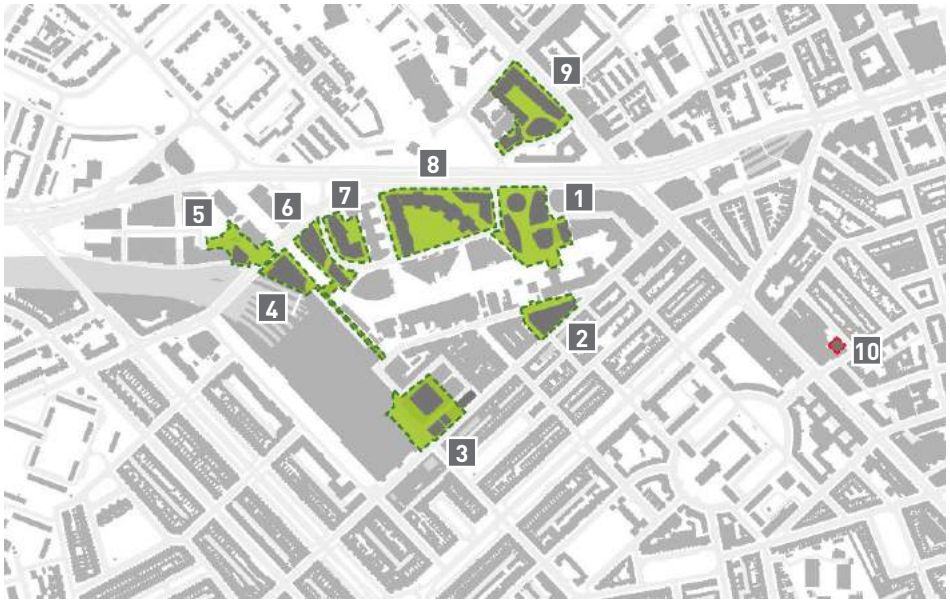


Figure 6.2: Paddington - significant planning applications (including taller buildings)

Figure 6.3: Paddington - significant planning applications (indicating proposed heights)

PADDINGTON

The following proposals have been approved within the wider Paddington area:

1 **Merchant Square** - a number of buildings including 43 storey residential tower 'The Cucumber' (150m); a 21 storey residential building (completed) and 14 storey residential (48.1m / 78.5m AOD)

2 **St Mary's Hospital, 'Triangle Site'** - 9 storey hospital (39.6m / 69.2m AOD)

3 **Paddington Cube** - 17 storey office with retail / cafe / restaurant use at ground and top levels (74.2m high / 102.7m AOD)

4 **Paddington Triangle** - 19 storey office (75.5m)

5 **1, Sheldon Square** - 20 storey hotel (78.3m / 112.5m AOD)

6 **55-65 North Wharf - residential led mixed use**

7 **Dudley House** - 8 storey school and 22 storey residential tower (71.6m / 101.8m AOD)

8 **North Wharf Gardens - residential led mixed use with buildings ranging from 11 to 19 storey (43 - 65m)**

9 **West End Gateway** - 30 storey residential tower (103.8m / 136.3m AOD). Proposal also includes a 19 storey building and 11 storey frontage to Edgware Road

The following scheme has been refused within the wider Paddington area:

10 **Landward Court** - addition of two storeys on top of existing 13 storey point block

Figure 6.4: Paddington - significant planning applications (indicated within existing context)

1 Sheldon Square

'The Cube'

Paddington Basin / Merchant Square

West End Green

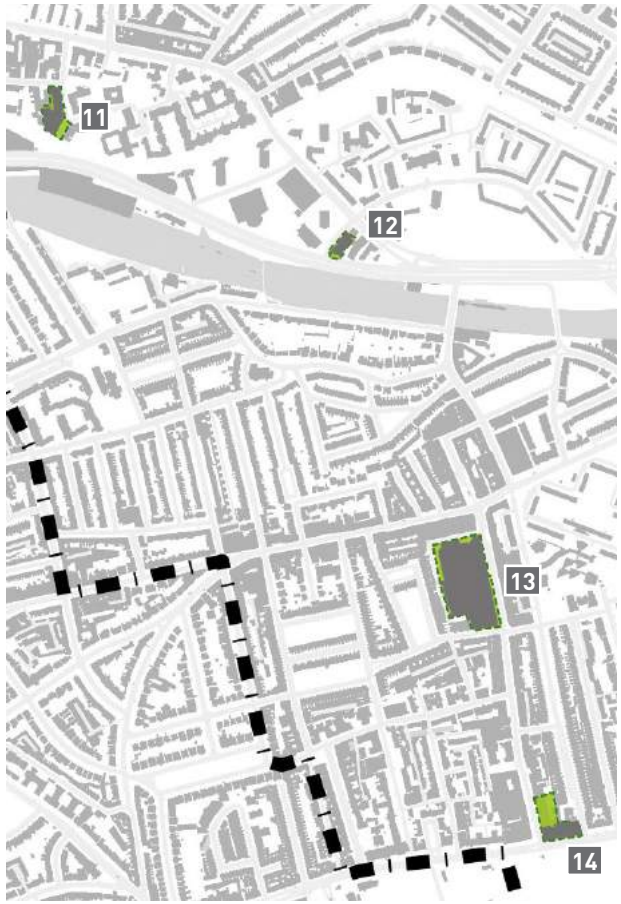


Figure 6.5: Bayswater / Westbourne Green - significant planning applications (including taller buildings)

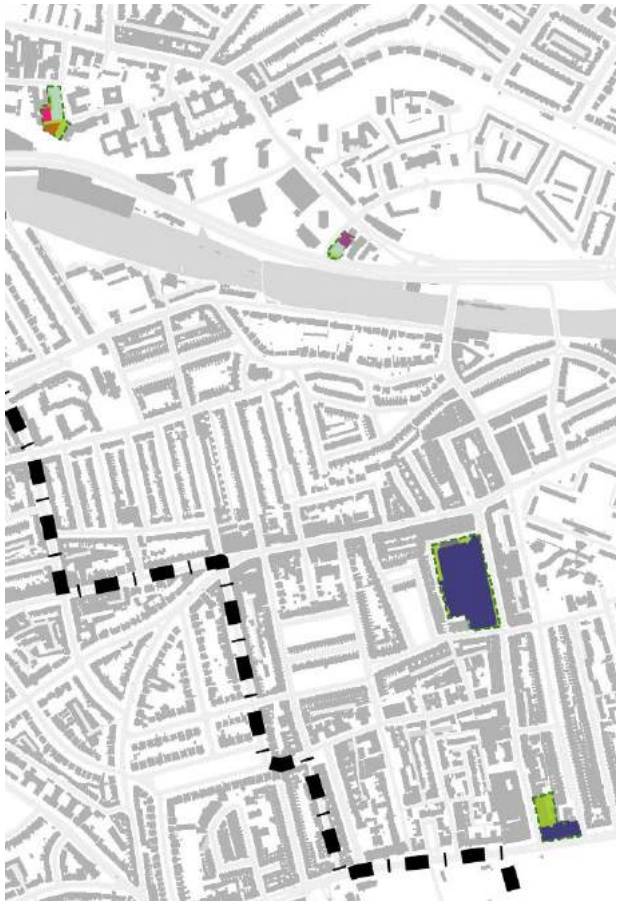


Figure 6.6: Bayswater / Westbourne Green - significant planning applications (indicating proposed heights)

BAYSWATER / WESTBOURNE GREEN

The following proposals have been approved within the Bayswater / Westbourne Green area:

11 **Hathaway House, Woodfield Road -** 14 storey tower, office ground floor with 13 residential storeys above (51.75m / 85.85 AOD)

12 **1, Torquay Street** - 13 storey building, providing hostel accommodation

13 **Whiteleys, Queens Road** - mixed use development with residential over retail and D-class uses, up to 10 storey. Scheme also includes a hotel (up to 40m height)

14 **117-125, Bayswater Road** - retail ground floor with 9 storey residential building above.

Figure 6.7: Bayswater / Westbourne Green - significant planning applications (indicated within existing context)

117-125 Bayswater Road

Hathaway House, Woodfield Road, Westbourne Green

Whiteleys, Queens Road (Foster and Partners)

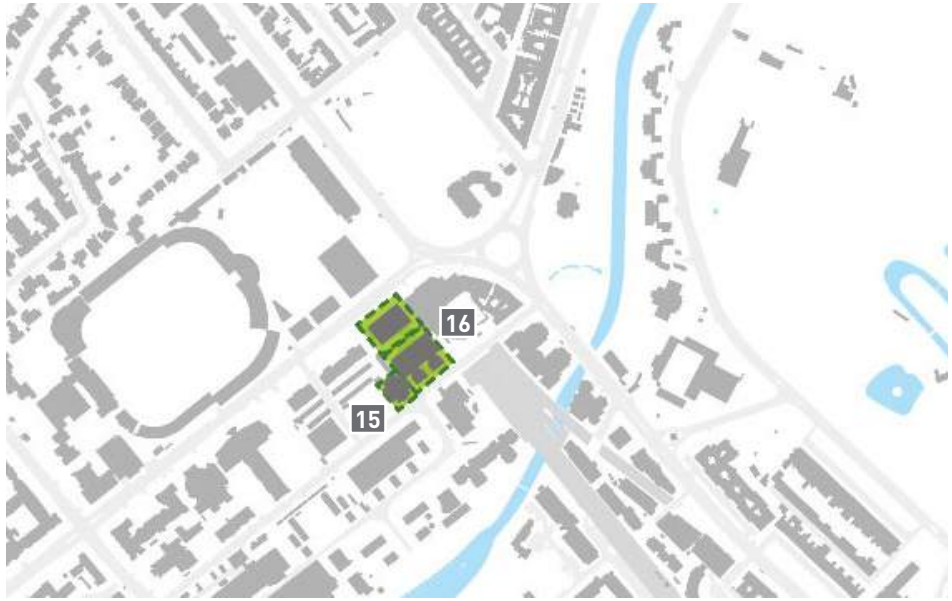


Figure 6.8: St John's Wood - significant planning applications (including taller buildings)

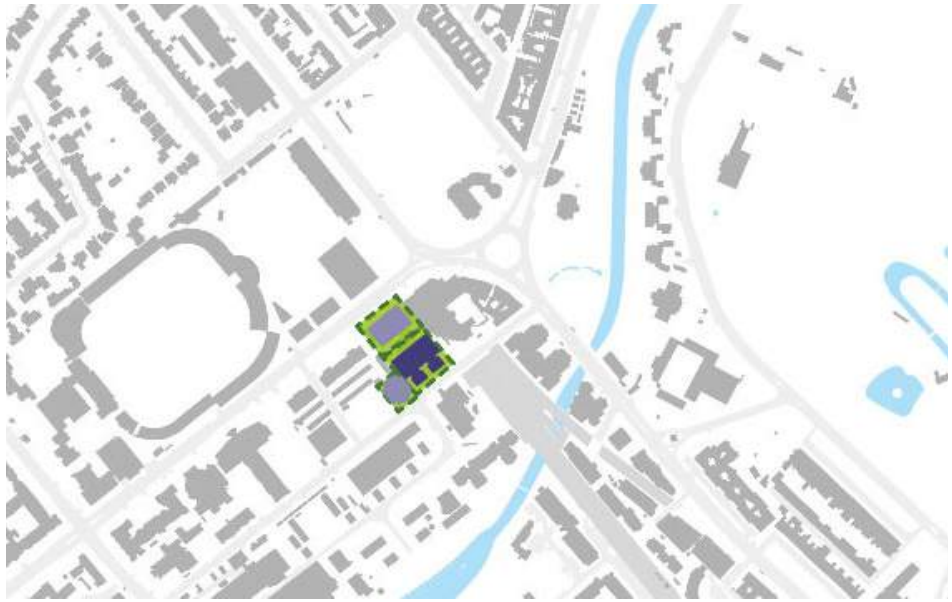


Figure 6.9: St John's Wood - significant planning applications (indicating proposed heights)

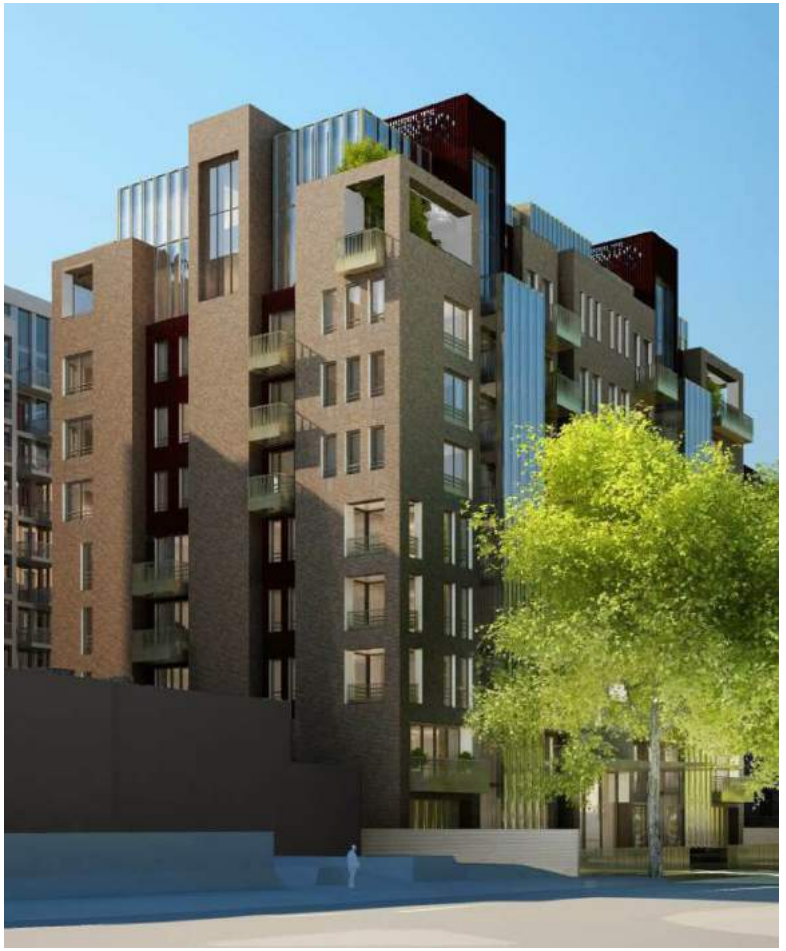
ST JOHN'S WOOD

The following proposals have been approved within the Bayswater / St John's Wood area:

15 **30 Lodge Road** - 10 storey residential point block (36m / AOD 72.78m)

16 **Dora House, 60 Lodge Road / St John's Wood Road** - 13 storey residential block (43.25m / AOD 80.75m) and 10 storey residential building

Figure 6.10: St John's Wood - significant planning applications (indicated within existing context)



Dora House, St John's Wood Road

Figure 6.11: West End / Oxford Street - significant planning applications (including taller buildings)

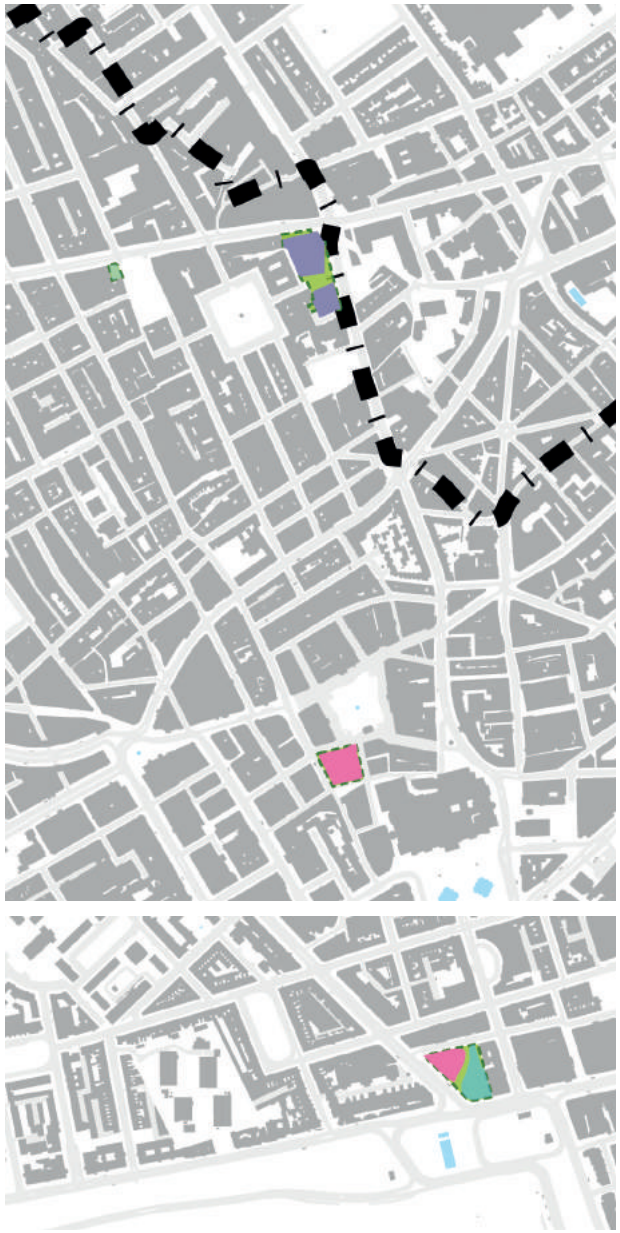


Figure 6.12: West End / Oxford Street - significant planning applications (indicating proposed heights)

WEST END / OXFORD STREET

The following proposals have been approved within the West End / Oxford Street area:

17 **1 Oxford Street / Tottenham Court Road station** - two buildings - a 9 storey office plus plant level (41.5m / 166.74 AOD) and 9 storey theatre / office plus plant level (39.5m / 164.73 AOD)

18 **103 Oxford Street** - Additional storey added to existing 5 storey building

19 **Whitcomb Street, Leicester Square** - 10 storey hotel and cinema (approx 35.7m / 51.4m AOD)

20 **5-9 Marble Arch** - mixed use scheme including 19 storey residential tower (65.7m / 92.35 AOD)

Figure 6.13: West End / Oxford Street - significant planning applications (indicated within existing context))

1-23, Oxford Street (Alford Hall Monaghan Morris Architects)

Whitcomb Street, Leicester Square (Woods Bagot)

1 Marble Arch (Rafael Vinoly)

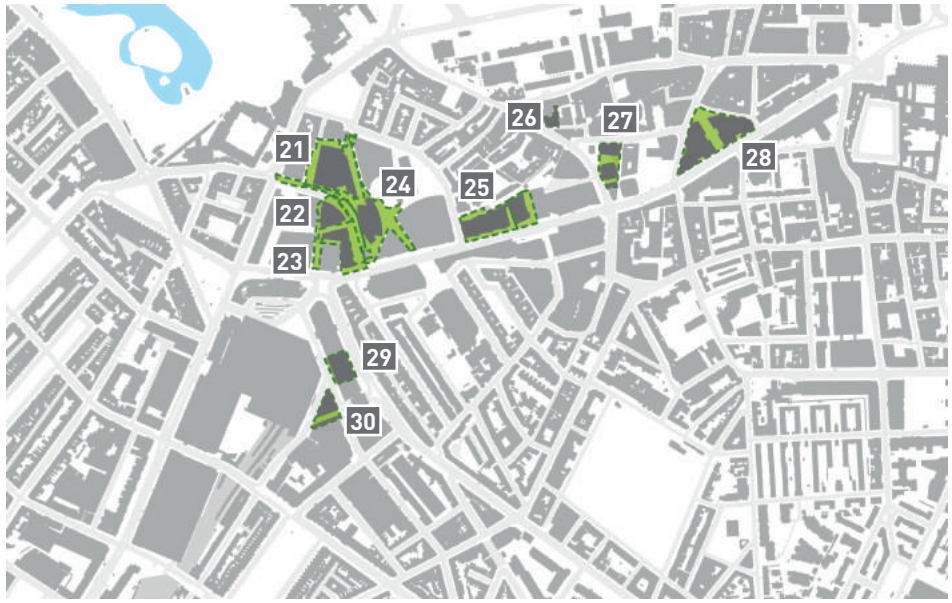


Figure 6.14: Victoria - significant planning applications (including taller buildings)

Figure 6.15: Victoria - significant planning applications (indicated within existing context)

VICTORIA

The following proposals have been approved within the Victoria area:

21 **Eland House -** 13 storey office building (48.15m / 53.65m AOD)

22 **Nova East** - 15 storey office (68.6m / 73.4m AOD)

23 **Nova building 7b/c** - mixed use building providing library, retail and office use over six storeys (31.1m /36.6m AOD)

24 **Portland House** - refurbishment of office building to residential (100.91m / 106.14AOD)

25 **Kingsgate -** two office buildings, stepping up from 13 storey office building (52.1m / 57.3m AOD)

26 **Vandon House** - replace existing four storey property with 7 storey boutique hotel

27 **Buckingham Green** - refurbishment of existing 17 storey point block to provide office / retail use at ground level 15 residential levels and plant level at top (66.0m / 69.83 AOD)

28 **New Scotland Yard, 8-10 Broadway** - mixed use development with office and retail within podium and six residential buildings rising above to a height from 14 to 20 storey (52.75 to 72.4m / 57.55 to 77.2m AOD)

29 **Parnell House** - refurbishment and addition of three storeys

30 **Stockley House, Wilton Road** - 14 storey residential building over retail ground floor (56.3m)

Figure 6.16: Victoria - significant planning applications (indicating proposed heights)

Eland House

New Scotland Yard (Squire and Partners)

Portland House refurbishment / change of use

Nova building at Victoria

7 A PLAN LED APPROACH

7.1 TALL BUILDING OBJECTIVES AND FOCUS AREAS

OBJECTIVES

The NPPF, London Plan and Historic England Advice Note all advocate a plan led approach to tall buildings. In that context it is important to establish a number of objectives in relation to tall buildings and to then consider whether there are any locations within the borough where tall buildings may be acceptable or appropriate. Drawing on the opportunities that tall buildings offer as identified in Chapter 3 and theoretical principles in Chapter 4 and in consideration of sensitivities the following objectives are promoted:

1. To take a planned and coordinated approach to Tall Buildings
2. To protect and enhance heritage assets, their setting and views to and from them
3. To respond sensitively to existing character, townscape and valued landscapes
4. To deliver economic growth, regeneration and intensification where appropriate
5. To enhance city image and strengthen the sense of place
6. To strengthen legibility and be proportionate to the role and importance of place
7. To promote a sustainable settlement pattern by concentrating development in areas well served by infrastructure
8. To deliver comprehensiveness
9. To promote outstanding urban and architectural design
10. To deliver tangible and wider benefits for the city

POTENTIAL FOR TALL BUILDINGS IN WESTMINSTER

Having evaluated the spatial structure of the borough, its historic development and evolution and its sensitivities in respect of heritage assets and views, this study concludes that **the majority of Westminster is not suitable for tall buildings**.

FOCUS AREAS

However the City Plan advocates growth within three opportunity areas at Victoria, Paddington and Tottenham Court Road and within two Housing Renewal Areas at Church Street / Edgware Road and Ebury Bridge Estate.

The greatest pressure for taller buildings is also within these areas, as evidenced in Chapter 6, and therefore, taking a plan led approach, these locations have been evaluated further to establish the potential for, and the height of tall buildings within these areas.

Three focus areas that encompass the opportunity and housing renewal areas and also capture adjacent site allocations have been identified. These are identified in Figure 7.1 as:

- Focus Area 1: Paddington / Church Street / Westbourne Green;
- Focus Area 2: Tottenham Court Road; and
- Focus Area 3: Victoria / Ebury Bridge.

The focus areas purposely extend beyond the established opportunity / housing renewal areas but only to provide context and in order to identify a study area, not to imply suitability for tall buildings. Indeed all three focus areas are sensitive to development with each focus area including listed buildings, conservation area designations and with protected views extending across the Tottenham Court Road and Victoria / Ebury Bridge focus areas.

The three areas are evaluated in further detail below with conclusions provided on the suitability of tall buildings and their potential scale.

TESTING THROUGH MODELLING

This evaluation has been supported by initial modelling of sites that were considered to have the potential to accommodate tall buildings based on their location and development opportunity.

For these selected sites view shed analysis was used to test the locations from which buildings at a range of heights would be visible. The impacts from particular sensitive viewpoints was then tested in the VuCity model. This is compared to street views taken from google maps. Views are not verified and should not be treated as accurate depictions of where buildings may be visible from but rather as an initial guide that has helped to inform the initial evaluation. The modelling of trees within VuCity cannot be taken to be accurate but again gives an indication of the winter scenario when trees are not in leaf. Modelled images are provided within the appendix to this report.

TALL BUILDINGS IN WESTMINSTER

As referenced in Chapter 4 and in response to planning policy the term tall building is a relative term and relates to both context height and the characteristics of an area, either as a place with consistent / homogenous height (coherent context) or varied height (varied context).

In Westminster a tall building is considered to be a building that is either 30m or greater in height or two times the context height, whichever is the lesser. Areas with a coherent context are generally more sensitive to additional height.

CONTEXT HEIGHT

Context height should be considered in respect of the role of a tall building. For a tall building promoted as a local landmark (marking a strategic street corner, public space or a particular function such as a station) the building will have a local significance and visibility and therefore the context height should be taken as the prevailing height within the neighbourhood (i.e. an area extending to approximately 500m from the site). For a tall building promoted to have district wide significance and marking a strategic infrastructure node or public institution (e.g. a hospital) where the visibility is likely to be greater the context height should be taken as the prevailing height within a more extensive area (i.e. an area extending to approximately 1,000m from the site).

Context height should be taken as the typical or prevailing height within an area, and high and tall buildings are considered to an exception to the context rather than defining the context itself.

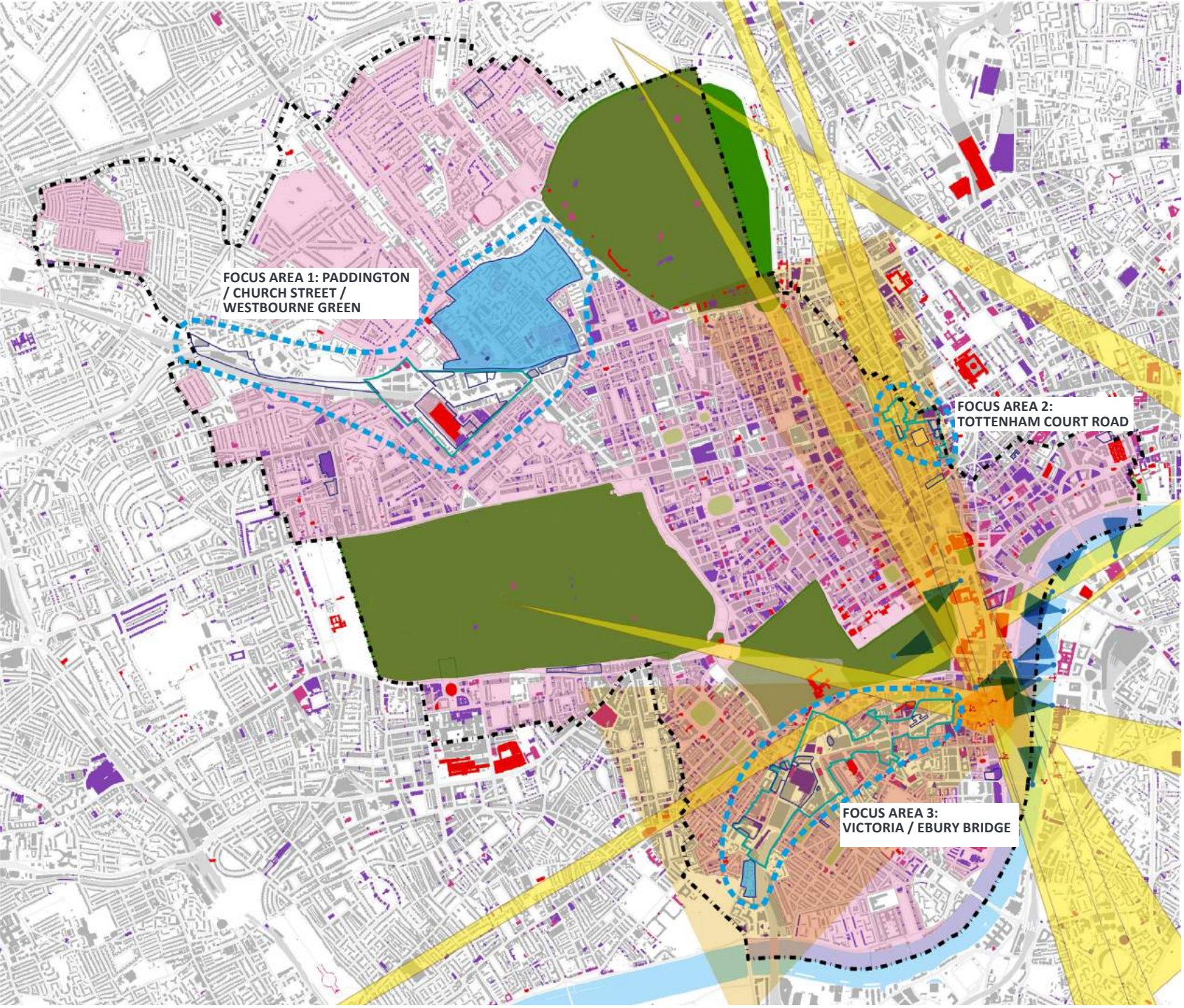


Figure 7.1: Focus areas

7.2 FOCUS AREA 1: PADDINGTON / CHURCH STREET / WESTBOURNE GREEN

OVERVIEW

This area encompasses the Paddington Opportunity Area, Church Street / Edgware Road Housing Renewal Area and several site allocations both within the opportunity area and to the west between the rail corridor and elevated Westway.

Paddington Basin has developed into a mixed-use quarter adjacent to the railway station with large floorplate office buildings adjacent to the basin and a number of residential and hotel buildings being brought forward. Land to the south of the basin is laid out as a grid of urban street blocks and a similar pattern extends to the north of the Westway within the Church Street area.

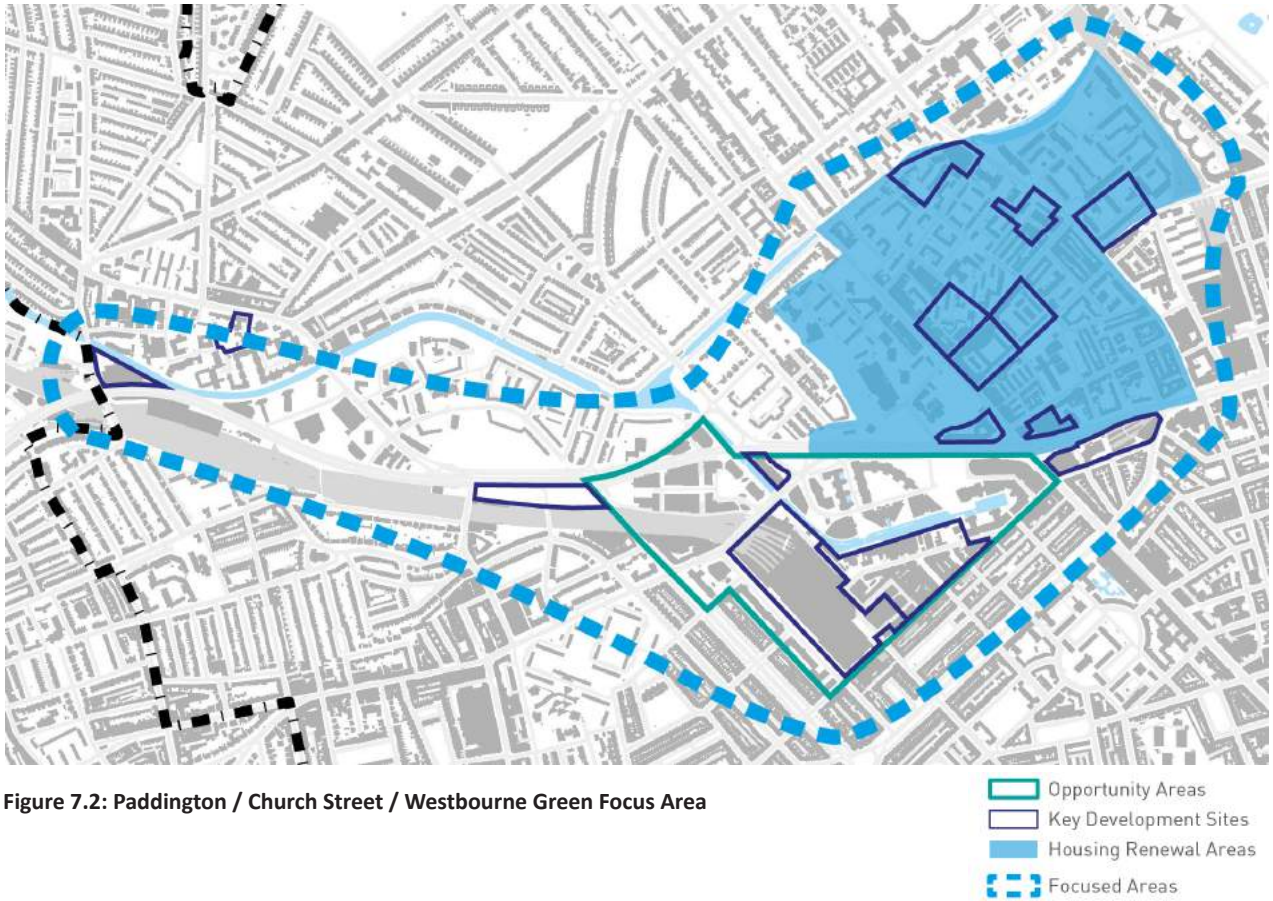


Figure 7.2: Paddington / Church Street / Westbourne Green Focus Area

EXISTING BUILDING HEIGHTS

Figure 7.3: Paddington / Church Street / Westbourne Green existing building heights

The prevailing context of the area is between 4 and 6 residential storeys however the height of buildings within Paddington Basin is significantly greater with many buildings between 40 and 60m (equivalent to 13-20 residential storeys). These are arranged in a formal manner around the basin and establish a cluster of greater height in this location.

EMERGING BUILDING HEIGHTS

Figure 7.4: Paddington / Church Street / Westbourne Green emerging building heights

A number of tall buildings have been consented within the area including a 43 storey residential tower at Merchants Square, that, at 150m in height, will, if built, be significantly taller than any other building in the area and the tallest building in Westminster.

A further 30 storey residential tower is under construction on Edgware Road – the West End Gateway.

CONSTRAINTS AND SENSITIVITIES

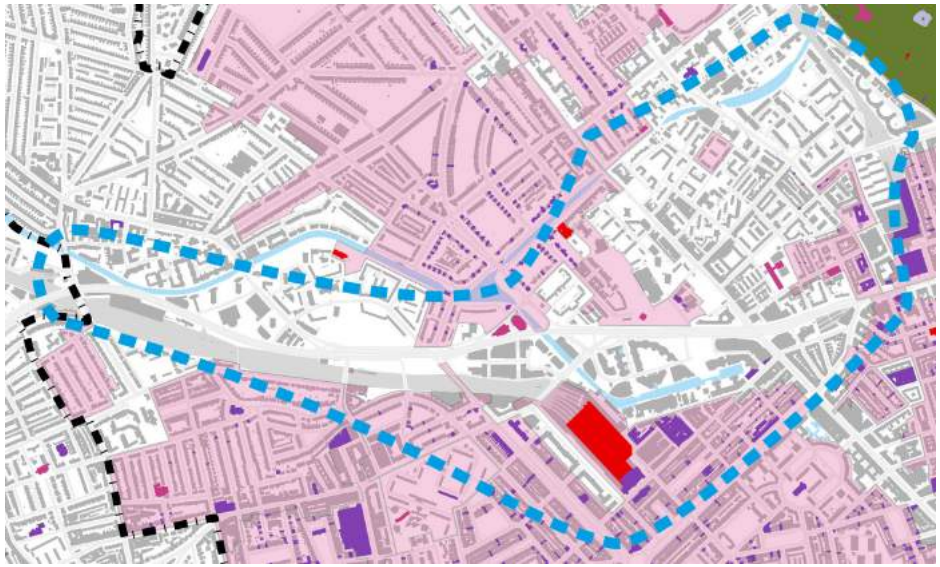


Figure 7.5: Paddington / Church Street / Westbourne Green constraints and sensitivities

Several Conservation areas are located within the Focus Area and extend to the southern edge of the railway line and incorporate land to the south of the basin including the Grade I listed Paddington station. To the north of the Westway the area around Little Venice and Paddington Green is also designated as conservation area.

The Westway and rail lines are sources of noise and air pollution and impact on the development potential of the land sandwiched between these corridors.

Borough boundary
Constraints
Conservation area
Listed buildings
Grade I
Grade II*
Grade II
Registered parks and gardens
Grade I
Focused area

PUBLIC TRANSPORT ACCESSIBILITY

Figure 7.6: Paddington / Church Street / Westbourne Green PTAL

The area immediately adjacent to Paddington station has the highest level of public transport accessibility although the accessibility level reduces to the north east of the Church Street HRA and to the west in Westbourne Green.

PTAL 1a
PTAL 1b
PTAL 2
PTAL 3
PTAL 4
PTAL 5
PTAL 6
PTAL 7

OPPORTUNITIES

A number of opportunities for tall buildings have been considered in the area. Our recommendations are set out below:

Paddington Basin

A cluster of taller buildings is already establishing within Paddington Basin with the proposed Merchant Square development providing the highest point.

The majority of sites around the basin have already been developed however there may be opportunity for redevelopment of the hospital sites located immediately to the south of the basin and these could be developed as mid-rise buildings forming an extension of the existing cluster. Proposals on these sites must respect and respond to the conservation area and listed buildings immediately to the south.

The prevailing context height for the wider Paddington area is identified as 6 residential storeys (20m) with a varied context. Tall buildings within this area of 2 to 3 times this context height may be appropriate (ie 40-60m).

Marylebone Flyover / Edgware Road junction

There may be opportunity to establish a cluster of tall buildings marking the important junction of the Westway / Marylebone Flyover with Edgware Road.

We recommend that the height of any tall building in this location step down significantly from, and be subordinate to, those in the Paddington Basin cluster. We also recommend that any tall building be slender and elegant in its form.

The prevailing context height in this area is 6 storeys (approx 20m) but as it sits within a varied context a local landmark building of 2 to 3 times the context height may be appropriate (ie 40-60m). The acceptability of a tall building proposed in this area would depend on the quality of its design reflecting its role as a local landmark.

Paddington / Royal Oak Station

The strip of land sandwiched between the railway lines and the Westway, adjacent Royal Oak station has been considered as a potential location for taller buildings offering the opportunity to create a more positive approach to the Paddington cluster when approaching from the west on the Westway.

The context height in this area is considered to be 5 storeys (18m) with a varied context. A local landmark building of 2 to 3 times the context height would therefore be 36 to 54m in height.

The proposition has been tested and modelled with buildings of 36, 45 or 54m. This modelling reveals significant impacts on the townscape of the surrounding conservation areas with buildings of 45m or 54m height and some impact with buildings of 36m in height (2 times the context height). Given the constrained nature of the site in terms of access, noise and air pollution delivering buildings at this more modest height may not prove viable.

Church Street area

The Church Street masterplan identifies areas for intensification as part of the housing renewal in the area. As part of this intensification there may be opportunity for tall buildings serving as local landmarks and marking Church Street, the main east-west route and the commercial focus for the area. We recommend that any tall buildings are delivered in the heart of the regeneration scheme as part of a comprehensive approach and where they don't impact on the residential amenity of the wider area.

Whilst there are some taller buildings within the area the prevailing context height for the Church Street area is considered to be 5 storeys (18m) with a varied context.

A tall building acting as a local landmark could be 2 to 3 times the context height and must contribute to the creation of a place with a strong and enhanced character.

The opportunities for the Marylebone Flyover / Edgware Road junction and Paddington / Royal Oak Station area are informed by modelling which is provided within the appendix to this document.

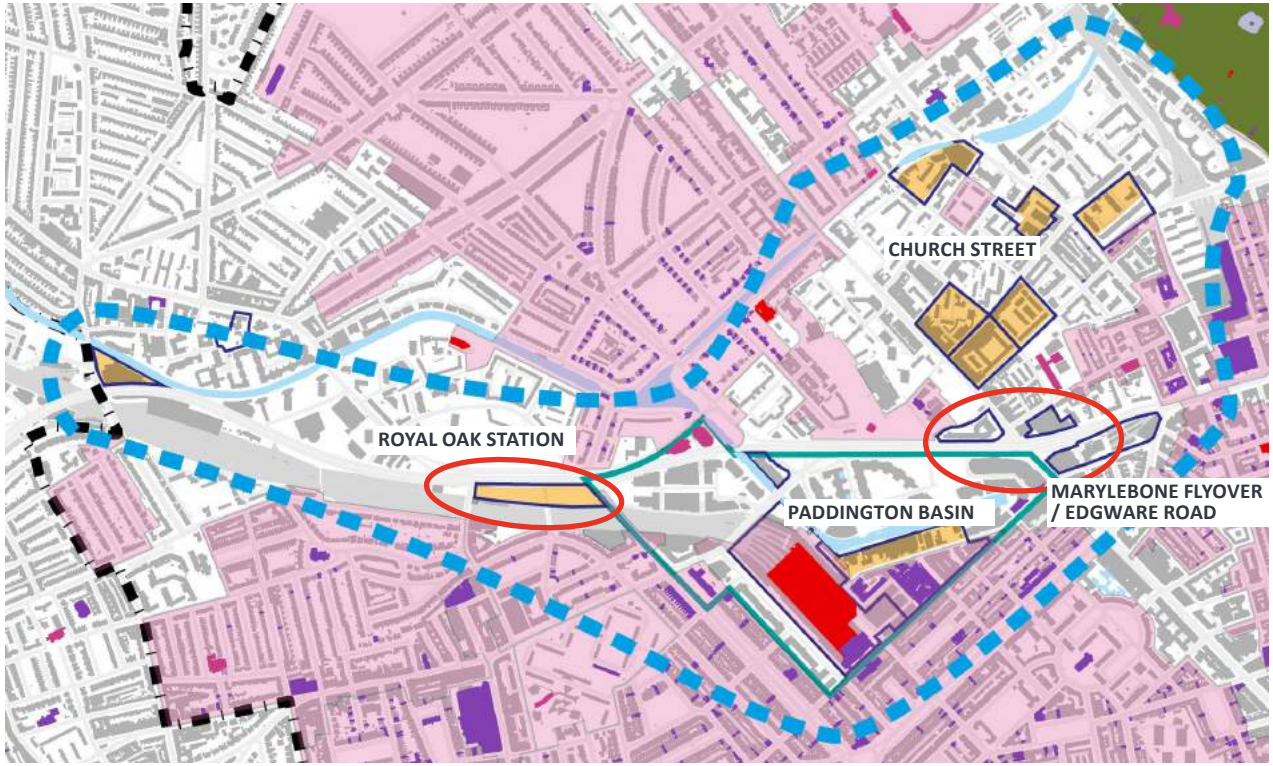


Figure 7.7: Paddington / Church Street / Westbourne Green opportunities

7.3 FOCUS AREA 2: TOTTENHAM COURT ROAD

OVERVIEW

Figure 7.8: Tottenham Court Road Focus Area

This area encompasses the Tottenham Court Road Opportunity Area, and is located on the eastern edge of the borough adjacent to LB Camden. The area includes a number of site allocations.

EXISTING BUILDING HEIGHTS

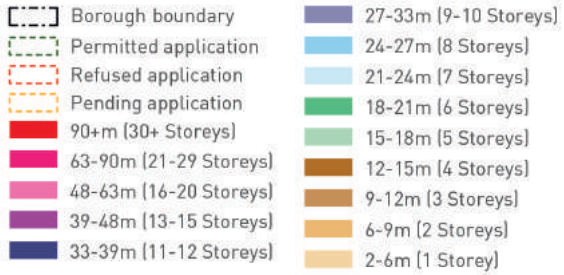
Figure 7.9: Tottenham Court Road existing building heights

The prevailing context of the area is between 6 and 9 residential storeys with greater height along the main streets Oxford Street and Tottenham Court Road and reduced height on minor streets to the south.

New development within the area is being brought forward in response to the existing context.

EMERGING BUILDING HEIGHTS

Figure 7.10: Tottenham Court Road emerging building heights



CONSTRAINTS AND SENSITIVITIES

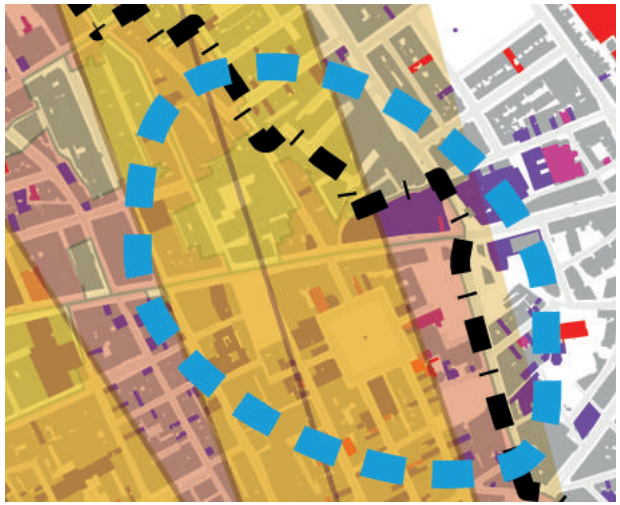


Figure 7.11: Tottenham Court Road existing building heights

The area is designated as conservation area, includes several listed buildings and LVMF view corridors 2A.2 and 2B.1 from the summit, and east of the summit, of Parliament Hill towards the Palace of Westminster extend across the area.

PUBLIC TRANSPORT ACCESSIBILITY

Figure 7.12: Tottenham Court Road emerging building heights

The area has the highest level of public transport accessibility and will also benefit from proximity to a new Elizabeth Line station at Tottenham Court Road.

OPPORTUNITIES

Our recommendation is that this area is not appropriate for tall buildings due to the consistent scale of the built fabric and heritage sensitivities. Planning consent has been granted on the site allocations within the area with the scale of development consistent with the existing context.

7.4 FOCUS AREA 3: VICTORIA / EBURY BRIDGE

OVERVIEW

This area encompasses the Victoria Opportunity Area, and Ebury Bridge Housing Renewal Area. A number of site allocations are identified within the area.

The area has been subject to intensification with both office, and more recently applications for residential development. Office development is focused on the western end of Victoria Street close to the railway station.

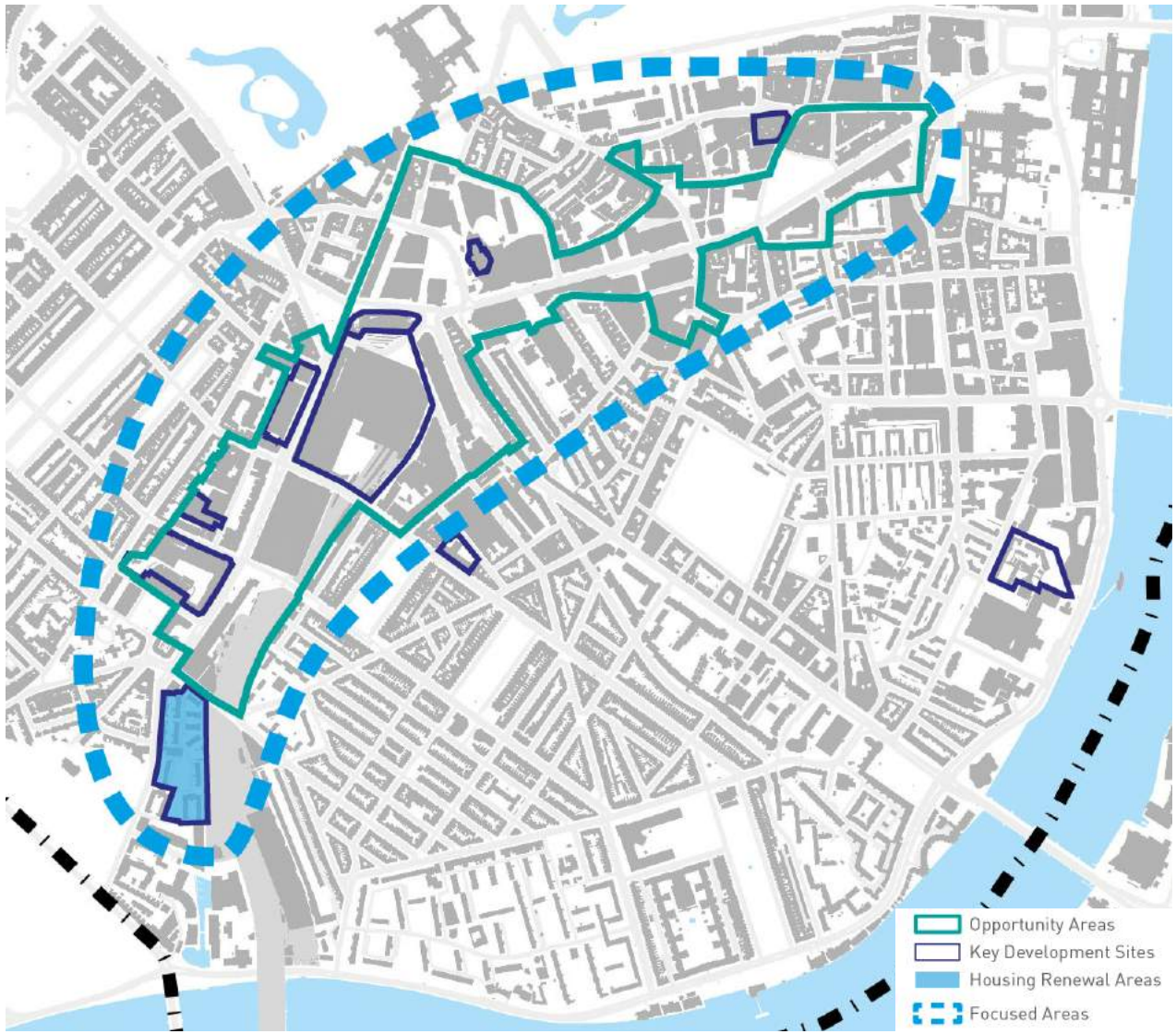


Figure 7.13: Victoria / Ebury Bridge Focus Area

EXISTING BUILDING HEIGHTS

Figure 7.14: Victoria / Ebury Bridge existing building heights

Building heights within the wider area, including Pimlico to the south, are 4 to 6 residential storeys although height increases along Victoria Street and around the station with many buildings in the range 11-15 residential storeys (33-48m) and several of significantly greater height, notably Portland House, the tallest building in the area at 101m.

EMERGING BUILDING HEIGHTS

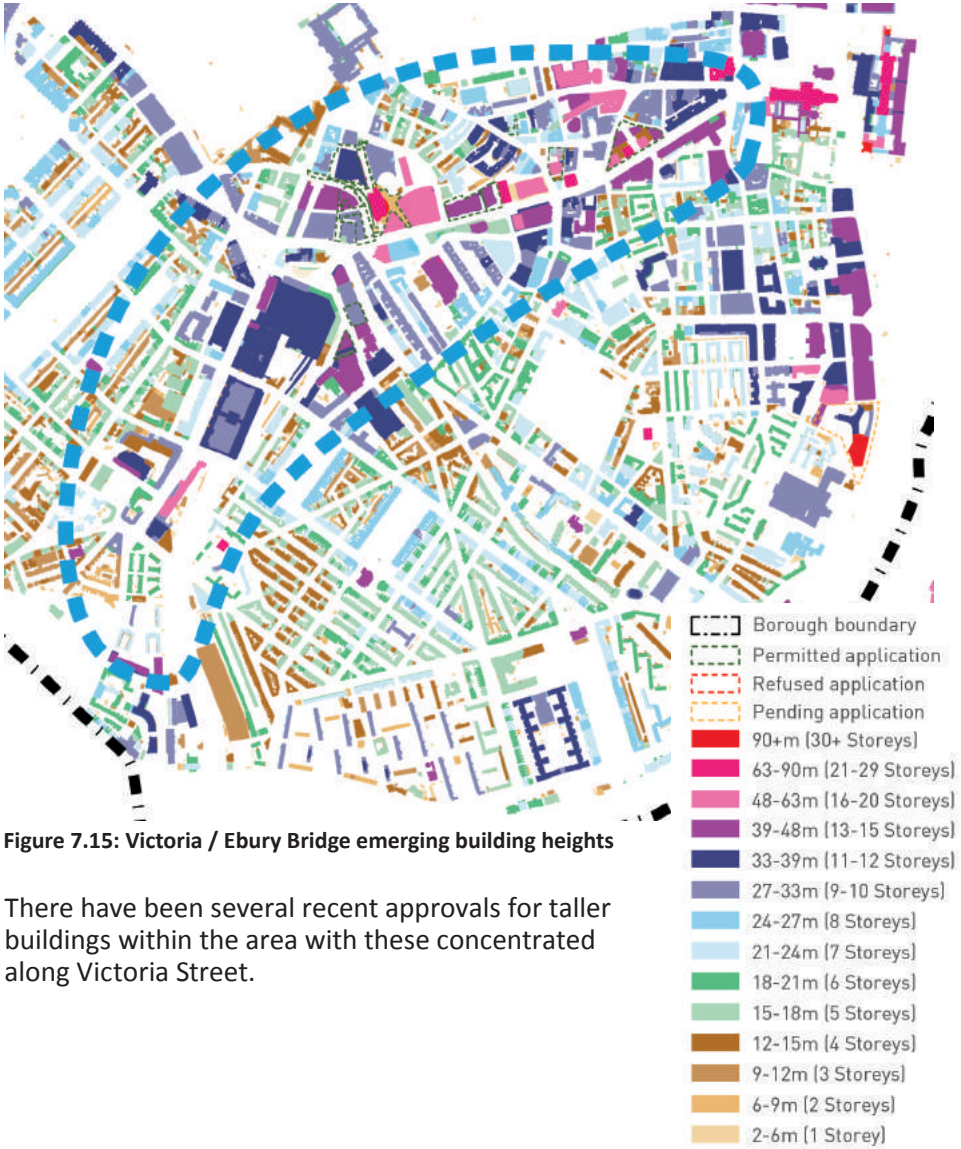


Figure 7.15: Victoria / Ebury Bridge emerging building heights

There have been several recent approvals for taller buildings within the area with these concentrated along Victoria Street.

CONSTRAINTS AND SENSITIVITIES

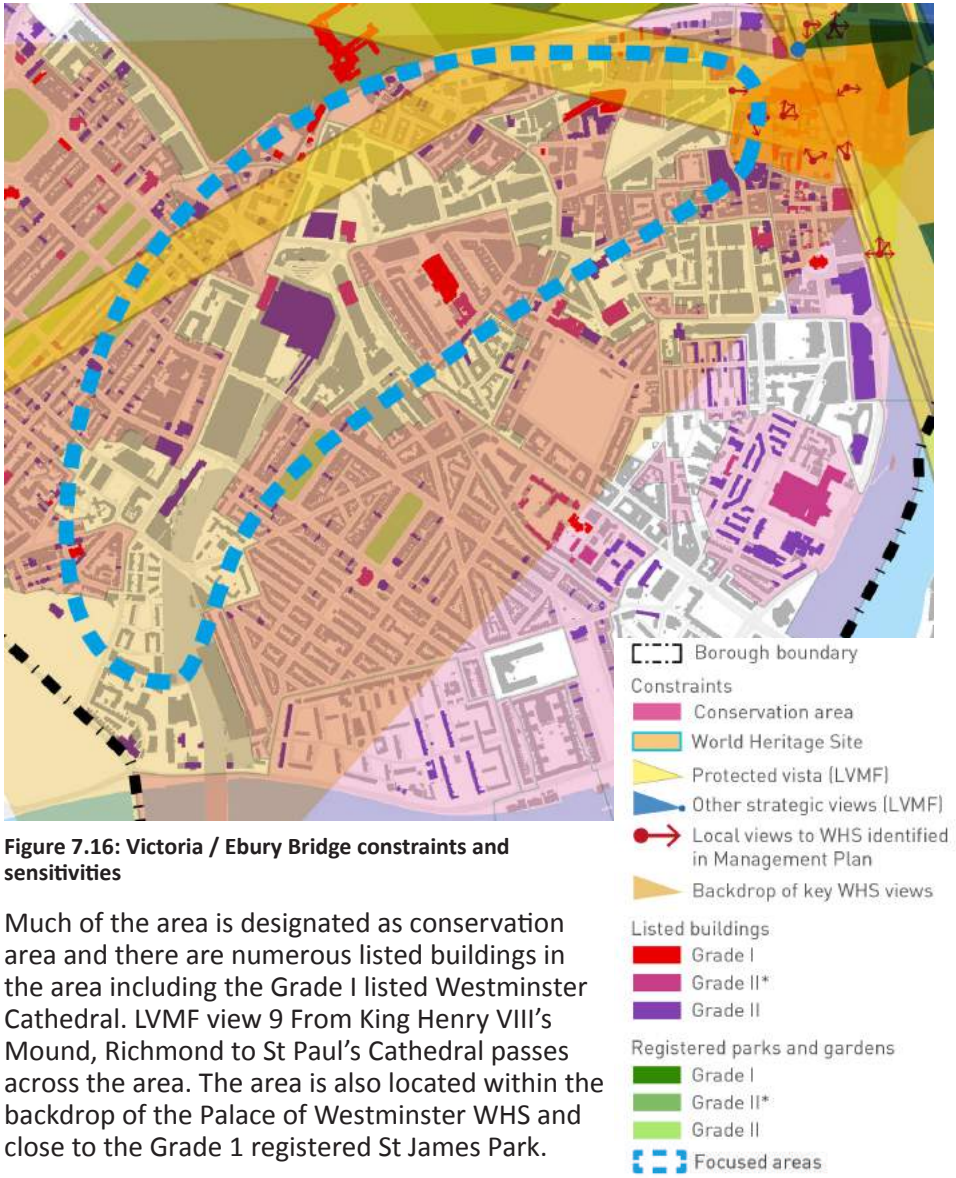


Figure 7.16: Victoria / Ebury Bridge constraints and sensitivities

Much of the area is designated as conservation area and there are numerous listed buildings in the area including the Grade I listed Westminster Cathedral. LVMF view 9 From King Henry VIII's Mound, Richmond to St Paul's Cathedral passes across the area. The area is also located within the backdrop of the Palace of Westminster WHS and close to the Grade 1 registered St James Park.

PUBLIC TRANSPORT ACCESSIBILITY

Figure 7.17: Victoria / Ebury Bridge PTAL

The area has the highest level of public transport accessibility.

OPPORTUNITIES

A number of opportunities for tall buildings have been considered in the area. Our recommendations are set out below:

Terminus Place

This site is located at the western end of Victoria Street, immediately to the north of the plaza in front of the station and is identified as a site allocation. The site could offer a marker for the station and contribute to the quality and character of the existing cluster.

The prevailing context height in Victoria is considered to be 6 residential storeys (20m) with a varied context. As a local landmark a tall building in this area could be 2 to 3 times the context height.

Any tall buildings in this area must not cause harm to the Outstanding Universal Value of the World Heritage Site and must be sensitive to the other listed buildings, conservation areas, registered parks and gardens within the wider area.

Ebury Bridge Housing Renewal Area

Consideration is being given to intensification of the existing estate and this may offer the opportunity to promote a number of tall buildings provided that they respect the setting and views from the surrounding Georgian and Victorian terraces within the adjacent conservation areas.

Any tall building within this area should be part of a comprehensive proposal that responds to the wider context, establishes an appropriate relationship with the railway line, buffering noise but avoiding delivering a 'wall of development' against the rail line.

The prevailing context height for this area is identified as 5 storeys (18m) as part of a varied context. Tall buildings of 2 to 3 times the context height may be appropriate.

We recommend that the tallest element should be at the northern end of the area marking Ebury Bridge and the crossing of the railway line, with building heights recommended to step down significantly from this location

The opportunities at Terminus Place is informed by modelling which is provided within the appendix to this document.

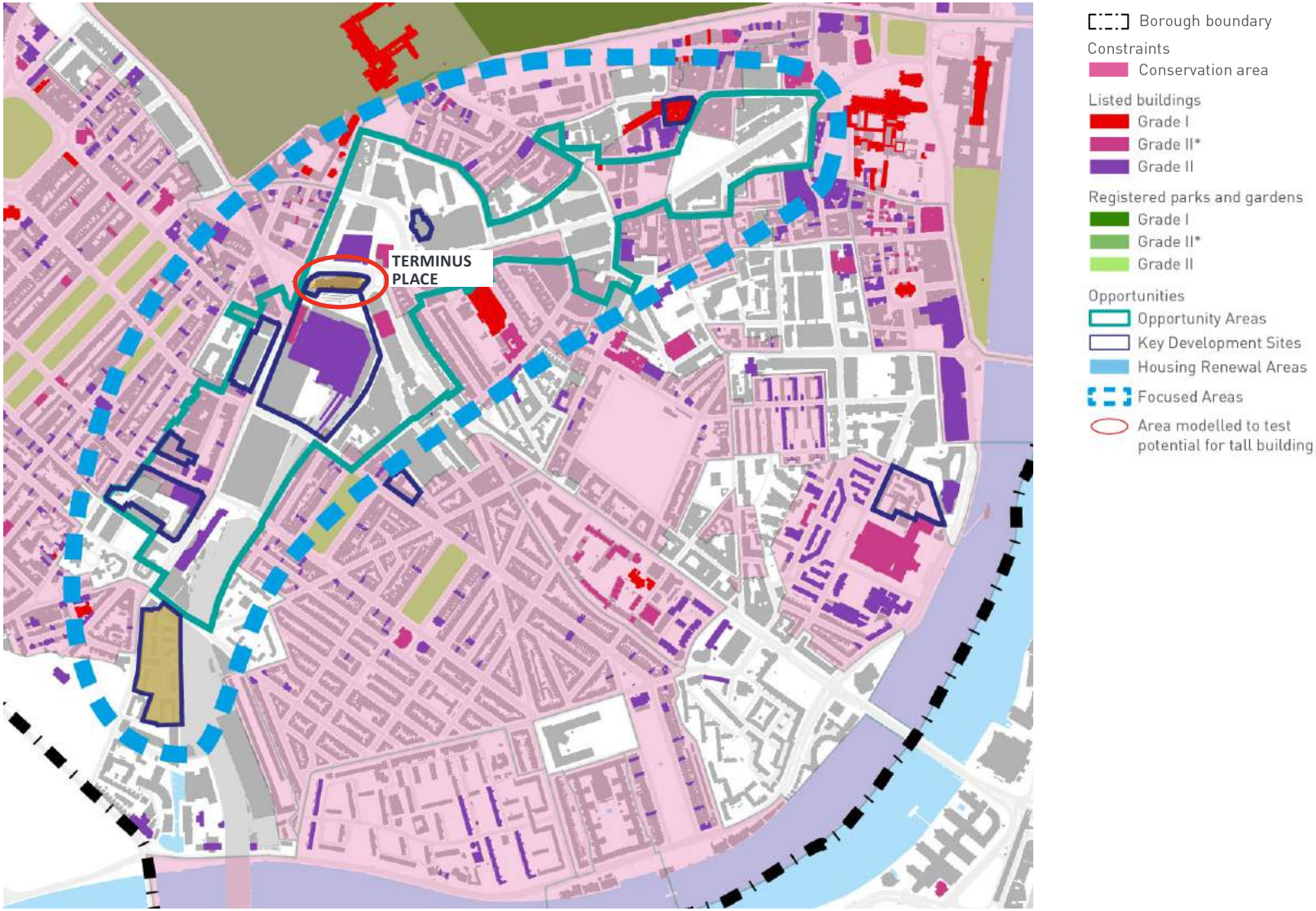


Figure 7.18: Victoria / Ebury Bridge opportunities

7.5 CONCLUSION

OVERVIEW

Westminster is a place with a long and rich history and with heritage assets that make it particularly sensitive to tall buildings.

Having evaluated the spatial structure of the borough, its historic development and evolution and its sensitivities in respect of heritage assets and views, this study concludes that **the majority of Westminster is not suitable for tall buildings**.

However the City Plan advocates growth within three opportunity areas at Victoria, Paddington and Tottenham Court Road and within two Housing Renewal Areas at Church Street / Edgware Road and Ebury Bridge Estate.

The greatest pressure for taller buildings is also within these areas as evidenced in Chapter 6 and therefore, taking a plan led approach, these locations have been evaluated further to establish the potential for, and the height of tall buildings within these areas.

The study concludes that tall buildings may be appropriate on a number of discrete sites in the Paddington / Church Street area and within the Victoria / Ebury Bridge area provided that they are of the highest architectural quality, are of a height that is proportionate to their location and their role within the wider townscape and that they respond sensitively to their context, the character and landscape value of their setting and views towards them.