

Heritage Statement

31 Great Queen Street, London

For:

Studio XM

February 2024

Ref: 4151

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Appendix A Planning Policy

1 Introduction

- 1.1 This Heritage Statement has been prepared by Smith Jenkins Planning & Heritage on behalf of Studio XM in support of the listed building consent application for the proposed retail unit renovation of 30 Great Queen Street, WC2B 5AE in the London Borough of Camden (hereafter referred to as 'the Site').
- 1.2 The Site comprises the ground floor retail unit at 30 Great Queen Street which is part of the Grade II listed 30 and 31 Great Queen Street which is located in the Seven Dials Conservation Area. The proposals comprise the internal refurbishment of the restaurant, bathrooms and kitchen in the ground floor retail unit and the replacement of an existing awning covering to the front of the building, changing only the fabric rather than the mechanism itself.
- 1.3 The conservation officer from Camden Borough Council visited the site on the 14th December 2023 to assess the site and the acceptability of the proposals. They concluded that there was little historic fabric remaining in the interior of the space and that the proposals are acceptable and would not cause any harm dependent on the detailed design. Furthermore, he concluded that the proposed awning cover replacement would not require advert of planning consent due to it being an almost like for like replacement.
- 1.4 Nevertheless, paragraph 200 of the National Planning Policy Framework (NPPF) 2023 sets out the information requirements for determining applications and states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made to their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance' (NPPF, 2023).
- 1.5 As such this this Heritage Statement has been prepared as a standalone document to satisfy paragraph 200 of the NPPF. In response to these policy requirements, Section 2 of this report identifies the heritage assets which may be affected by the application proposals. Section 3 sets out the historic development of the application site and the surrounding area, whilst Section 4 provides statements of significance for the heritage assets identified within Section 2. These are relative to the scale, nature and effect of the proposed development.
- 1.6 Section 5 provides an assessment of the application proposals on the significance of the identified heritage assets, based on national, regional and local policy and guidance. The heritage planning policy context for the consideration of these proposals is set out in Appendix A. This includes the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, regional and local planning policy.

2 The Heritage Assets

2.1 A heritage asset is defined by the NPPF as:

'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)' (NPPF, 2023).

Designated Heritage Assets

2.2 A designated heritage asset is described by the NPPF as:

'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation' (NPPF, 2023).

2.3 Such assets are statutorily identified as having a level of heritage (architectural and/or historic) interest to justify designation. There are then particular procedures in planning decisions to ensure that their special interest is preserved or enhanced.

Listed buildings

2.4 The Site forms part of the Grade II listed 30 and 31 Great Queen Street which was designated on the 15th January 1973 (NHLE: 1113214).

2.5 There are a number of listed buildings in the surrounding area but due to the minor nature of the proposed external works, as confirmed by the conservation officer, they will have no impact on the significance of these listed buildings and so have been taken out of the scope of further assessment.

2.6 The Site is the only relevant heritage asset for the purposes of a proportionate assessment, the significance of which and the potential impact on is assessed in Section 4 below.

Conservation Areas

2.7 The Site is wholly located in the Seven Dials Conservation Area which was designated in November 1971 and extended in 1974, 1991 and 1998. An Area Statement for the Seven Dials Conservation Area was adopted in 1998.

2.8 Due to the majority of the works taking place to the interior and the only external works comprising replacement of the external awning (which is confirmed to not require advertising consent or planning permission by the conservation officer), further assessment of the Seven Dials Conservation Area has also been taken out of the scope of further assessment.

3 Historic development

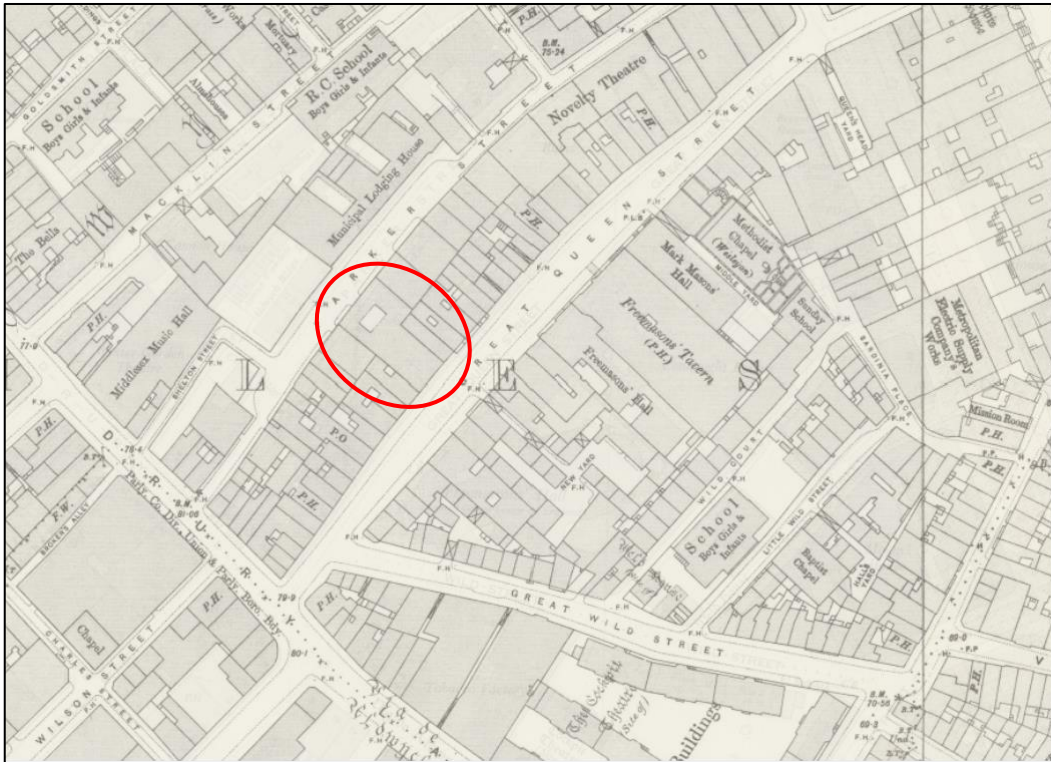
- 3.1 The Site is located on Great Queen Street in the London Borough of Camden, a historic thoroughfare running from Long Acre in the west to Kingsway in the east crossing several notable historic streets such as Drury Lane and High Holborn.
- 3.2 Great Queen Street has its origins in the medieval period and was named after Queen Ann of Denmark, King James I's wife, and used to form a royal private route to James I's favourite residence in Hertfordshire. The road was known as 'Queen Street' from the beginning of the 17th century later becoming 'Great Queen Street' from 1670 onwards. The street was first laid out from the middle of the 17th by William Newton, one of the most prominent speculative builders of the period, who was given permission to build fourteen large houses on the south side of the street.



3.1 - William Morgan's Map of London, 1682. Approximate location of the site in red.

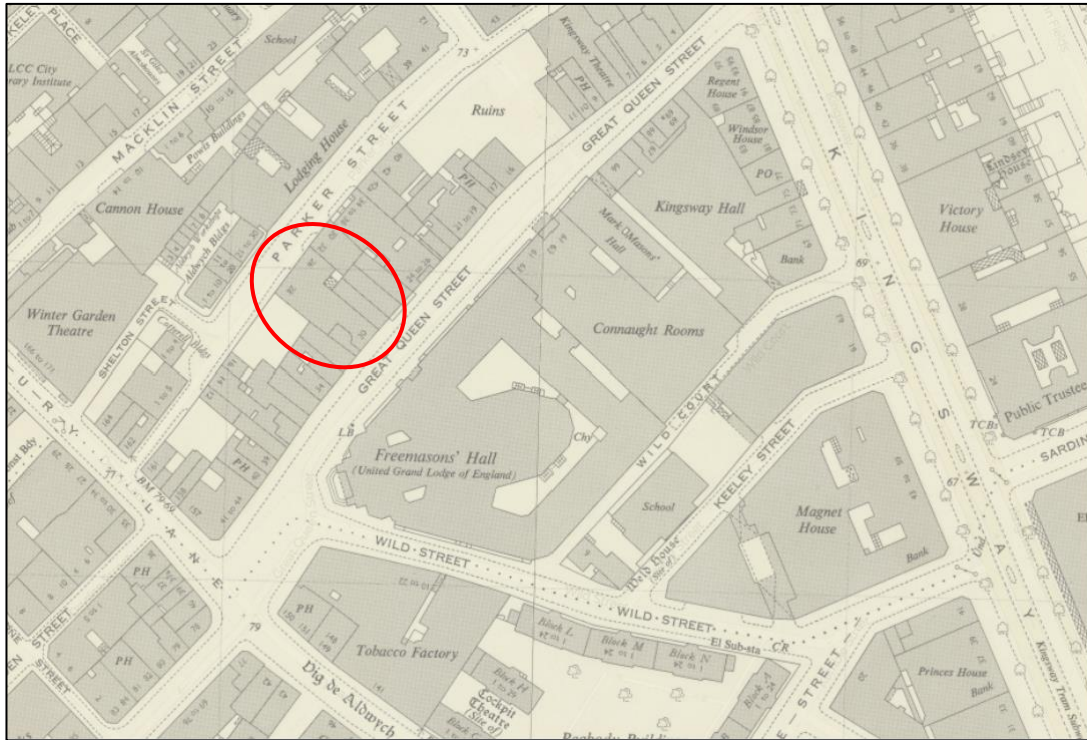
- 3.3 From the mid-18th century the character and architecture of the street became closely associated with Freemasonry. In 1774 the Moderns' Grand Lodge bought a house on the southern side of Great Queen Street and subsequently built Freemasons Hall, the headquarters of the organisation which was completed in 1775. They additionally built the Freemason's Tavern, several additional premises and schools for both boys and girls along the street. The original hall was rebuilt twice, first replaced in 1863 and then again in 1933 which is the present building on the Site. The street remains an important location for Freemasonry in London with several Masonic institutions located along Great Queen Street shaping its development as well as character and appearance.
- 3.4 In the 19th century, Great Queen Street underwent significant changes due to rapid industrialisation and urban expansion. The arrival of the railway and the opening of nearby stations, such as at Holborn Viaduct in 1874, saw a huge increase in the number of visitors to the area and subsequently further development. This rapid expansion led to a number of Victorian and later Edwardian style buildings

being built resulting in a mixture of architectural styles as well as building types. During this period a number of Georgian buildings were either rebuilt or re-fronted as well.



3.2 - Ordnance Survey Map of 1893-96 with the location of the site in red.

- 3.5 In the 1930s, much of the southern side of Great Queen Street was demolished to make way for the Freemasons Hall and other buildings including the Grand Connaught Rooms. The Freemasons Hall was completed in 1933 standing on the corner of Great Queen Street and Wild Street forming an iconic Art Deco style landmark in the area.
- 3.6 Like much of central London, Great Queen Street suffered damage from enemy bombing in World War II. However, unlike many other areas, after the war the rebuilding effort focused on the restoration of many of the buildings to ensure the character of the historic streetscape survived. Subsequently areas of Great Queen Street were rebuilt and other modern developments were constructed in line with the rising commercial activity and increasing demand for offices, retail space and businesses. These are prevalent along the northern portion of the street. Today, Great Queen Street is a bustling thoroughfare featuring a mix of residential buildings, commercial premises and cultural institutions.



3.3 – Ordnance Survey Map 1940-60s with site circled in red.

4 Significance

4.1 The significance of a heritage asset is defined within the glossary of the NPPF as:

'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting' (NPPF, 2023).

4.2 Listed buildings are statutorily designated and, for the purposes of the NPPF, are designated heritage assets. Recognising this statutory designation, buildings must hold special architectural or historic interest. The Department of Culture, Media and Sport publish the 'Principles of Selection for Listed Buildings (2010)' which is supported by thematic papers, 'Listing Selection Guides', based on building type, which give more detailed guidance.

4.3 Conservation Areas are identified if they are of special architectural or historic interest, the character or appearance of which should be preserved or enhanced. Historic England has published guidance on the designation of Conservation Areas which provides a framework for the identification of those features that form the character and appearance.

Assessment

4.4 The following statement of significance for the Site as a Grade II listed building is proportionate to the importance of the asset and the potential impact of the proposals.

30 and 31 Great Queen Street

- 4.6 The Site comprises 30 Great Queen Street which is the ground floor retail unit as part of the Grade II listed 30 and 31 Great Queen Street (NHLE: 1113214). The building was designated in January 1973 and is also located in the Seven Dials Conservation Area.

Historic interest

- 4.7 The historic interest of 30 and 31 Great Queen Street is derived from its association with the history of freemasonry and in particular the development and importance of freemasonry along Great Queen Street.
- 4.8 30 and 31 Great Queen Street was constructed in 1923 as the Royal Masonic Institute for Girls as one of the facilities run for the education and care of the daughters of Freemasons who were struggling financially. The original school (located elsewhere) was opened in 1789 and is believed to be the first school for girls to open in England. Due to increasing demand the school has relocated a number of times, several within London until finishing a permanent school large enough in Rickmansworth in 1934.
- 4.9 It is unknown when the institute on Great Queen Street closed, possibly when the new school was built, but after its closure it was converted into offices with a retail unit on the ground floor which continues as the composition today.



4.1 - 30 and 31 Great Queen Street in 1966 (London Metropolitan Archives)

Architectural and Historic Interest

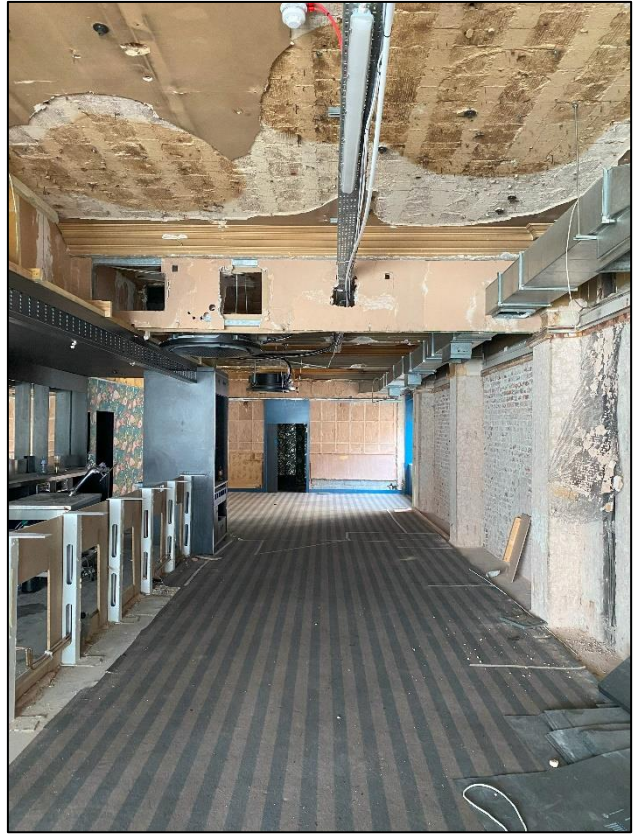
- 4.10 The architectural interest of 30 to 31 Great Queen Street is derived from its interest as an early-20th century institutional building built between 1923-4 in the Classical style which was designed by the architect Ernest R. Barrow.

Exterior

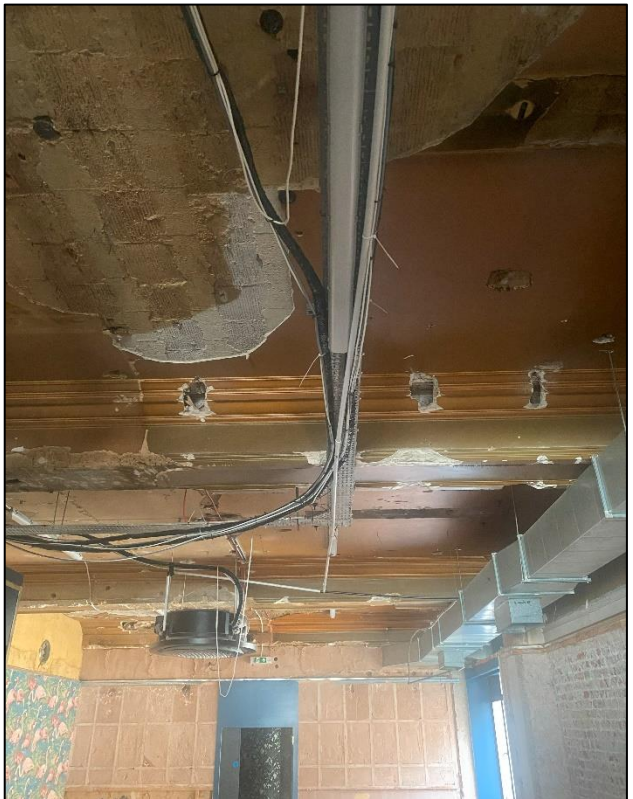
- 4.11 30 and 31 Great Queen Street is three storeys, plus attic and is constructed of Bath stone with a steep slated roof. The front facade exhibits a grand appearance featuring Classical motifs and features of interest. At ground floor level there is a 20th century shopfront extending across 3 bays and two recessed entrance bays to the ends with decorative console bracketed cornices and recessed balcony to the right side bay with a coat of arms to the left side.
- 4.12 To the upper storeys the central 3 bays are separated with Corinthian attached columns and pilasters which rise through first and second floors supporting an entablature topped by 4 allegorical figures constructed of Portland stone. The frieze has a modern inscription with 'Royal Masonic Trust for Girls and Boys'. Of particular note is the central dormer with broken pediment flanked by Portland stone allegorical figures. Other architectural features of interest include a deep dentilled cornice to third floor, rustication, carving, and architrave.

Interior

- 4.13 For the purposes of this assessment only the interior of the ground floor retail unit will be described as it is the only part of the building undergoing works.
- 4.14 Originally part of the educational institute, the ground floor shop unit was created around the middle of the 20th century. Historic photographs indicate that numerous businesses have occupied the space over the years, and most recently the space was used as a restaurant. Although it retains the original 20th century shopfront, the role of the space as a retail unit does not contribute particularly to the buildings overall significance as it has been adapted from its original intended use.
- 4.15 The retail unit is accessed through the right hand entrance of the building. The internal floorplan consists of the main customer area which takes up the majority of the space with staff and customer toilets to the rear and several smaller service areas including the kitchen, stores and offices. The unit is currently empty but has most recently been used as a bar/restaurant.
- 4.16 The retail unit has undergone a preliminary interior strip out which has removed the modern soft fixtures and fittings allowing for an analysis of the interior. The conservation officer from Camden Borough Council visited site on the 14th December 2023 and confirmed that only modern fittings had been removed and that there is little surviving historic fabric in this part of the building. The only surviving feature is the extensively damaged decorative ceiling and cornicing which is present throughout the retail unit, as shown in Figures 4.2 and 4.3 below. This was previously located above a suspended ceiling.



4.2 – Interior photographs of the customer area of the retail unit showing the existing fittings and areas of the damaged historic ceiling and cornicing.



4.3 – Kitchen (left) and areas of damaged ceiling (right)

Setting

- 4.17 The setting of 30 and 31 Great Queen Street makes a contribution to its significance through its association and visual relationship to nearby historic buildings forming part of the historic streetscape of Great Queen Street. The building also has a particularly strong historic and architectural connection to the adjacent Freemasons Hall. As a result, 30 and 31 Great Queen Street stands out on the historic streetscape and is prominent in views up and down Great Queen Street.

Summary of significance

- 4.18 30 and 31 Great Queen Street is of special architectural and historic importance as an early 20th century building designed in Classical style with highly decorative architectural features on the exterior including Corinthian columns, motifs and broken pedimented dormer. Further significance is drawn from its historic association to freemasonry and a former Royal Masonic Institute for Girls. Its setting is defined by the historic streetscape of Great Queen Street as well as associative value to nearby assets such as the Freemasons Hall.

5 Assessment of proposals

- 5.1 The heritage, legal and planning policy relevant to the consideration of the application proposals is set out in Appendix A of this report. This legal and policy context includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF as well as regional and local policy for the historic environment.
- 5.2 In accordance with paragraph 200 of the NPPF, the significance of the designated and non-designated heritage assets that may be affected by the application proposals have been set out in Section 3 of this report.
- 5.3 The NPPF requires local planning authorities to identify and assess significance of a heritage asset that may be affected by the proposals (paragraph 201). They should take the assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.
- 5.4 Account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability, and the desirability of the new development making a positive contribution to local character and distinctiveness (paragraph 196).
- 5.5 When considering the impact of proposals on the significance of designated heritage assets, the NPPF requires (paragraph 205) that great weight should be given to their conservation and the more important the asset, the greater the weight should be. This is consistent with recent high court judgements (Barnwell Manor, Forge Fields) where great weight should be attached to the statutory duty.
- 5.6 Where a development proposal causes harm to the significance of designated heritage assets, this should either be treated as less than substantial (paragraph 208), or substantial (paragraph 207). In determining the level of harm, the relative significance of the element affected should be taken into account. Furthermore, local planning authorities are also encouraged to look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance. According to paragraph 212, proposals that preserve those elements of setting the make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

The proposals

- 5.7 The Proposals comprise the full internal refurbishment of the interior of the ground floor retail unit to provide a new restaurant. The refurbishment will take place throughout the ground floor unit including the main customer area, bathrooms, kitchens, stores and office.
- 5.8 The proposals also include the replacement of the front awning covering, changing only the fabric rather than the mechanism itself. The assessment of this aspect of the scheme has been scoped out as per the conservation officer comments which state *'provided that the size and area of fabric remain the same, the signage is a comparable size to the existing and the method of illumination is unchanged, then these works would not require advert consent or planning permission'*. (email dated Jan 18th).

Impact of application proposals

30 and 31 Great Queen Street

- 5.9 30 and 31 Great Queen Street is Grade II listed, it is of special architectural and historic importance as an early 20th century building designed in Classical style with highly decorative external architectural features including Corinthian columns, motifs and broken pedimented dormer. Further significance is drawn from its historic association to freemasonry and a former Royal Masonic Institute for Girls. Its setting is defined by the historic streetscape of Great Queen Street as well as associative value to nearby assets such as the Freemasons Hall.
- 5.10 The proposed works will involve a complete refurbishment of the ground floor retail unit involving a complete upgrade of the space to create a new restaurant. The conservation officer has visited site and provided their comments on the interior significance of the space confirming that *'there is little surviving historic fabric within this part of the building, with the exception of a somewhat damaged decorative ceiling with structural down stands...'* (email dated Jan 18th).
- 5.11 As shown in the proposed plans, a new suspended ceiling will be installed as part of the works in the same position as the one that was previously within the building. As advised by the conservation officer, this new suspended ceiling will protect the remains of the historic ceiling and any new services will also utilise existing openings and not cause any further damage.
- 5.12 The rest of the proposed works would refurbish all modern interventions to the space. The conservation officer also advised that *'works to the kitchen area and bathrooms simply refurbish modern alterations and raise no concerns.'*
- 5.13 Overall, the proposed works would preserve the significance of 30 and 31 Great Queen Street.

Considerations against legislation and policy

Statutory Duties

- 5.14 The Planning (Listed Buildings and Conservation Areas) Act 1990 place a duty upon the decision maker in determining applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.
- 5.15 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the character and appearance of conservation areas.
- 5.16 The proposed works would preserve the significance of 30 and 31 Great Queen Street and the wider Seven Dials Conservation Area.

NPPF (2023)

- 5.17 The significance of the designated heritage assets, as required by paragraph 200 of the NPPF, has been set out in Section 3 of this report. The application proposals would preserve the significance of 30 and 1 Great Queen Street and the Seven Dials Conservation Area.

5.18 Accordingly, the application proposals are in accordance with the NPPF.

Local Policy

5.19 As per Policy D2 of the Camden Local Plan, this report has outlined the special significance of the designated heritage assets which have the potential to be affected by the proposals and concluded that they preserve their significance. The proposals are therefore in accordance with the Camden Local Plan 2017.

6 Conclusion

- 6.1 This Heritage Statement has been prepared to assess the impact of the proposed development comprising the internal refurbishment of the ground floor retail unit of the Grade II listed 30 and 31 Great Queen Street.
- 6.2 In accordance with paragraph 200 of the NPPF, the significance of the designated heritage assets which have the potential to be affected by the application proposals have been described in this statement. A clear understanding and appreciation of the significance of the heritage assets has informed the evolution of the proposals.
- 6.3 This report has concluded that the application proposals preserve the significance of 30 and 31 Great Queen Street and the Seven Dials Conservation Area.
- 6.4 The application proposals are in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2023) and relevant regional and local policy and guidance, including the Central Bedfordshire Local Plan (July 2021).

Appendix A: Planning Policy

Legislation

Planning (Listed Building and Conservation Areas) Act 1990

Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

According to Section 69 of the Act a Conservation Area is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

Section 69 further states that it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. Adding, The Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character and appearance of Conservation Areas. Further provisions are detailed in Section 74 of the Act.

Recent case law¹ has confirmed that Parliament’s intention in enacting Section 66 (1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means “to do no harm”. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. This can also logically be applied to the statutory tests in respect of conservation areas.

National Planning Policy

National Planning Policy Framework (NPPF) February 2021

The National Planning Policy Framework (NPPF) was published on 20th of July 2021 and sets out the Government’s planning policies for England and how these are expected to be applied. It has purposefully been created to provide

¹ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) Historic England (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the 'golden thread' which is expected to run through the plan-making and decision-taking activities. It should be noted however, that this is expected to apply except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets², as set out in paragraph 11 of the NPPF.

Within section 12 of the NPPF, 'Achieving well-designed places', Paragraphs 126 to 136, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.

Section 16, 'Conserving and Enhancing the Historic Environment', Paragraphs 189-208, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance³.

The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment. These considerations should be taken into account when determining planning applications:

The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;

- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness;
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 191 of the NPPF states that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

In order to determine applications for development, Paragraph 194 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting⁴.

² **Designated heritage asset** – A World Heritage Site, Scheduled Ancient Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation designated under the relevant legislation.

³ **Significance** – The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described with each site's Statement of Outstanding Universal Value forms part of its significance.

⁴ **Setting of a heritage asset** - The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. (NPPF Annex 2: Glossary)

Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to Paragraph 195, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraph 196 adds that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.

Paragraphs 197 to 201 consider the impact of a proposed development upon the significance of a heritage asset⁵. Paragraph 199 emphasises that when a new development is proposed, great weight should be given to the asset's conservation⁶ and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

Paragraph 202 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Paragraph 203 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Adding, that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 204 stipulates that local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

In addition, Paragraph 206 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Paragraph 207 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The NPPF therefore continues the philosophy of that upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. English Heritage (now Historic England) defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places,

⁵ **Heritage asset** – A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated and assets identified by the local planning authority (including local listing).

⁶ **Conservation** – The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances the significance. (NPPF Annex 2: Glossary)

while accommodating the changes necessary to ensure their continued use and enjoyment.' (Constructive Conservation in Practice, English Heritage, 2009).

National Guidance

Planning Practice Guidance (PPG) 2019

Planning Practice Guidance (PPG) was introduced by the Government as a web-based resource on 6th March 2014 and is updated regularly, with the most recent update on 23rd July 2019. The PPG is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Adding, it is the degree of harm, rather than the scale of development that is to be assessed. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset.

Finally, the PPG provides in depth guidance on the importance of World Heritage Sites, why they are important and the contribution setting makes to their Outstanding Universal Value. The PPG also provides guidance on the approaches that should be taken to assess the impact of development on the Outstanding Universal Value of World Heritage Sites.

Historic England Guidance - Overview

On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (December 2017).

- 1.1. The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

In addition to these documents, Historic England has published several core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include;

'HEAN1: Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)', 'HEAN2: Making Changes to Heritage Assets' (25th February 2016) and 'HEAN3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015). In addition to these 'HEAN4: Tall Buildings' (March 2022), 'HEAN7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021), 'HEAN10: Listed Buildings and Curtilage' (21st February 2018), 'HEAN12: Statements of Heritage Significance' (October 2019), and HEAN13. Collectively, these Advice Notes provide further information and guidance in respect of managing the historic environment and development within it.

Historic England Good Practice Advice Note 1 (GPA1): The Historic Environment in Local Plans (March 2015)

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to 'inform the nature of allocations so development responds and reflects local character'.

Further information is given relating to cumulative impact, 106 agreements, stating 'to support the delivery of the Plan's heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.' It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

Historic England Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that 'development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.'

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and

6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

Historic England Good Practice Advice Note (GPA3): The Setting of Heritage Assets (December 2017)

This is used to understand the surroundings of a heritage asset which may contribute to its significance. It aids practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG, once again advocating a stepped approach to assessment.

It amalgamates 'Seeing the History in the View' (2011) and 'Setting of Heritage Assets' (2015) forming one succinct document which focuses on the management of change within the setting of heritage assets.

The guidance is largely a continuation of the philosophy and approach of the previous documents, albeit now with a greater emphasis on the contribution that views to and from heritage assets make to their significance. It reaffirms that setting should be understood as the way in which an asset is experienced.

The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise, vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset's surroundings.

This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It identifies that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, as well as further weighing up the potential public benefits associated with the proposals. It clarifies that changes within the setting of a heritage asset may have positive or neutral effects.

It highlights that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using a '5-step process' in order to assess the potential impact of a

proposed development on the setting and significance of a heritage asset, with this 5-step process similar to that utilised in earlier guidance:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England Advice Note 1 (HEAN1): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)

First published by English Heritage March 2011 as: *Understanding Place: Conservation Area Designation, Appraisal and Management* and republished as *Conservation Area Appraisal, Designation and Management*, Historic England Advice Note 1 2016, Historic England Advice Note 1 (HEA): *Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)* continues to support the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management.

This second edition updates the advice in light of the publication of the 2018 National Planning Policy Framework and gives more information on the relationship with local and neighbourhood plans and policies. It is also re-ordered, to underline the staged approach to the appraisal, designation and management of conservation areas, while continuing to offer advice on managing conservation areas so that the potential of historic areas worthy of protection is fully realised. It has also been updated to give more information on innovative ways of handling conservation appraisals, particularly community involvement beyond consultation, character assessment and digital presentation.

This document identifies different types of special architectural and historic interest which contribute to the significance and character of a conservation area, leading to its designation. These include:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
- Those linked to a particular industry or individual with a particular local interest;
- Where an earlier, historically significant, layout is visible in the modern street pattern; Where a particular style of architecture or traditional building materials predominate; and
- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest.

Change is inevitable, and often beneficial, and this document provides guidance in respect of managing change in a way that conserves and enhances conservation areas. It also identifies ways in which suitable areas can be identified

for designation as new conservation areas or extensions to conservation areas through historic characterisation studies, production of neighbourhood plans, confirmation of special interest and setting out of recommendations.

Historic England Advice Note 2 (HEAN2): Making Changes to Heritage Assets (February 2016)

The purpose of this document is to provide information in respect of the repair, restoration and alterations to heritage assets. It promotes guidance for both LPAs, consultants, owners, applicants and other interested parties in order to promote well-informed and collaborative conservation.

The best way to conserve a building is to keep it in use, or to find an appropriate new use. This document states that 'an unreasonable, inflexible approach will prevent action that could give a building new life...A reasonable proportionate approach to owners' needs is therefore essential'. Whilst this is the case, the limits imposed by the significance of individual elements are an important consideration, especially when considering an asset's compatibility with Building Regulations and the Equality Act. As such, it is good practice for LPAs to consider imaginative ways of avoiding such conflict.

This document provides information relating to proposed change to a heritage asset, which are characterised as:

- Repair;
- Restoration;
- Addition and alteration, either singly or in combination; and
- Works for research alone.

Historic England Advice Note 12 (HEAN12): Statements of Heritage Significance (October 2019)

HEA12: Statements of Heritage Significance covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

The document states that understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Historic England Advice Note 16 (HEAN 16): Listed Building Consent (June 2021)

HE16: Listed Building Consent provides advice on how to judge whether proposals require listed building consent and how to make informed applications for this. It also advises on what works are likely to need listed building consent or not, and provides guidance on submitting successful applications.

The note emphasises the importance of understanding the significance of a listed building and where it gains its special interest, and recommends the assistance of heritage professionals to increase the likelihood of a successful listed building consent application, as well as utilising contractors who have experience with historic buildings to carry out works.

It provides a reminder of the relevant policies that are laid out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular sections 7,8 and 9), the NPPF and the PPG. The note's 'Annex 1' provides examples of common scenarios involving proposals of works to a listed building, and advises as to whether or not these would

require listed building consent. Additionally, a table of potential proposed works is laid out with guidance as to what would not require an application for listed building consent and what exceptions there are likely to be.

Conservation Principles, Policies and Guidance (English Heritage, 2008)

Conservation Principles outlines English Heritage's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in English Heritage's own advice and guidance through the planning process, the document is commended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

This document was published in line with the philosophy of PPS5 and is currently in the process of being updated. Nevertheless, it remains relevant to the current policy regime in that emphasis is placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being: evidential, historical, aesthetic and communal. The Principles emphasise that 'considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment' (paragraph 25).

Strategic Policy

The London Plan 2021

The new London Plan was adopted in March 2021. The Plan forms part of the strategic Development Plan and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It replaces all previous versions of the London Plan.

The concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, underpins the new London Plan 2021, ensuring that it is focused on 'sustainable development' for future generations.

Policy D1 'London's form, character and capacity for growth' places a duty on the London Boroughs to define an area's character at a local level in order to understand its capacity for growth. Policy D1 states that a Borough's area assessment should cover the urban form and structure the area (for example the existing townscape qualities including building height and density), as well as the historical evolution and the identification of heritage assets, including an assessment of their significance and contribution to local character. Assessments should also identify important views and landmarks.

Policy D3 'Optimising site capacity through the design-led approach' seeks every new development to make the most efficient use of land by optimising its capacity, through a 'design-led approach'. A design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that specific site. Good design and good planning are intrinsically linked, with the form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive and make the best use of the finite supply of land. Development should be designed to respond to the special characteristics of its locality, which could include a predominant architectural styles/building material; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. In specific regard to heritage, Policy D3 states development should 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'.

Policy D9 'Tall Buildings' states that Development Plans at a local level should define what is considered a tall building for specific localities, though it is noted that this should not be less than 6 storeys, or 18 metres measured from ground to the floor level of the uppermost storey. It states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development. This process should include engagement

with neighbouring boroughs that may be affected by such developments. Additionally, any future development proposal for a tall building should address its potential visual impacts, including long-range, mid-range and immediate views from the surrounding streets. The Plan requires tall buildings to reinforce hierarchy of the local and wider context, aiding legibility and wayfinding with the locality, whilst the materials and architectural quality should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. Proposals should take account of and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The cumulative impacts of proposed, consented and planned tall buildings within an area must also be considered when assessing a tall building proposal.

Chapter 7 of the Plan sets out the relevant policies concerning development within the historic environment, stating that the built environment, combined with its historic landscapes, provides a unique sense of place within the city, whilst layers of architectural history provide an environment that is of local, national and international value. The Plan seeks to identify and promote sensitive management of London's heritage assets, in tandem with the promotion of the highest standards of architecture, maintaining the blend of old and new that contributes to the city's unique character. Policy HC1: 'Heritage conservation and growth' states:

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
 - 1. setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2. utilising the heritage significance of a site or area in the planning and design process
 - 3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies

for their repair and re-use.

London is home to four UNESCO World Heritage Sites, being among the most important cultural heritage sites in the world, standing as key features of London's identity as a 'world city'. The Plan seeks to protect, conserve World Heritage Sites to promote and transmit their Outstanding Universal Value on to future generations. Policy HC2 'World Heritage Sites' states:

- A. Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.
- B. Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.
- C. Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.
- D. Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

Policy HC3 'Strategic and Local Views' concerns the protection of viewpoints within the city, recognising the significant contribution views make to the image and character of London at the strategic level, with the Mayor seeking to protect the composition and character of these views. Policy HC3 specifically states:

- A. Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- B. Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.
- C. The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.
- D. The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.
- E. The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will,

when necessary, review this guidance.

- F. Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.
- G. Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

Policy HC4 'London View Management Framework' seeks to preserve London's Protected Vistas, requiring development to make a positive contribution and where possible enhance the viewer's ability to recognise Strategically-Important Landmarks. Policy HC4 states:

- A. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.
- B. Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.
- C. Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.
- D. Development proposals in designated views should comply with the following:
 - 1. London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate
 - 2. River Prospects should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context
 - 3. Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.

Essentially the London Plan 2021 seeks to celebrate London's rich history, ensuring the character of an area underpins how it will grow and develop in the future. The Plan encourages the enhancement of the historic environment and looks favourably upon proposals which seek to maintain the significance and setting of the city's heritage assets.