

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M47 STRATEGIC AND LOCAL VIEWS

**M47. Would policies HC3 and HC4 provide an effective and justified approach to protect and enhance the composition and character of strategic views and their landmark elements in London? In particular:**

**a) Would Policy HC3 be an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to the protection of those views?**

1. London First raises no objection to the approach set out in HC3 in respect of the preparation of local plans and neighbourhood plans.

**b) Policy HC3G and para 7.3.6 refer to local views. Are 'local views' a strategic matter? If so, what is the justification for giving such views the same degree of protection as strategic views? In this regard, would the policy be effective?**

1. Local views are, by their very definition, a local rather than a strategic matter. The level of protection for any local view should be relative to its location and quality and a matter for the relevant local planning authority to determine (or authorities, should the view be in close proximity to an administrative boundary).
2. London First therefore objects to the second sentence of supporting paragraph 7.3.6 of the draft Plan and believes this should be deleted:

*7.3.6 Clearly identifying important local views in Local Plans and strategies enables the effective management of development in and around the views. ~~Where this has been done, these local views should be given the same degree of protection as Strategic Views.~~*

3. Local views may vary significantly in terms of distance and the extent of townscape covered. There is no justification for a sweeping statement in the

draft Plan as above, suggesting that all local views should be afforded the same degree of protection as Strategic Views. Indeed, if any local views are worthy of that level of protection, then they should have been given Strategic View status in Table 7.1 of the draft Plan.

4. On this basis, London First believes that HC3 is not effective in respect of the relative protection of local views and delivery of the Good Growth objectives.

**c) Would the criteria in policy HC4 provide an effective and justified basis for development management? Would they provide sufficient clarity to enable a decision maker to reconcile competing considerations?**

1. During the consultation process, London First did not raise any objection to Policy HC4 as originally worded in the December 2017 version of the draft Plan. However, London's First's position on this policy has changed since the publication of the GLA's Minor Suggested Changes in August 2018. The proposed revisions to the explanatory text supporting Draft Policy HC4 (new paragraphs 7.4.1A and 7.4.1B) go beyond the remit of 'minor' by introducing the new concept of reinstating Landmark Viewing Corridors.
2. The new insertions suggest that building heights and massing should be reduced on sites which are deemed currently to detract from Landmark Viewing Corridors, regardless of the age or quality of the existing built form on the site. As a result, London First now objects to the supporting text for Policy HC4 on the grounds of the potential implications for delivering the Good Growth objectives. This is not a legitimate Minor Change. It represents the introduction of a new policy principle, through supporting text, which has not followed due process or been properly tested.
3. In the decision-making process, precedent and the existing conditions of a site generally represent a significant material consideration in the assessment of any proposal for redevelopment. Yet paragraphs 7.4.1A and 7.4.1B will blight certain existing sites within Landmark Viewing Corridors. Due to the impact on site value and the viability surrounding their redevelopment, older buildings will never come forward for redevelopment.
4. The insertions therefore have the potential to stifle economic growth in certain locations, including those within areas as designated by the Mayor for growth, and it is considered that further work should be undertaken to assess Landmark Viewing Corridors and the sites that might be affected before the principle is introduced.