

Development in Historic Contexts: Establishing Objective Criteria for Visual Assessments

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Introduction

An assessment of any development must be based on evidence. The three principal evidence-based resources are:

- The Place: its geography, geometry and history;
- The Proposal: its origin, appropriateness and quality;
- The Planning Context: its intention, management, aspiration and exception.

All these require thorough analysis:

- The Place can be known through the exploration of its physical form, the understanding of its historic linkages, the experience of its seasonal change, its visual appearance, its attributes and deficiencies and how it is regarded by people past, present and future.
- The Proposal is an imagination; something difficult to know. We do so through drawings, models and the designer's descriptions. But it must also be interrogated, put on trial and understood from a multitude of standpoints.
- The Planning Context requires understanding through: research; discovering the policy motivations be they social, political and economic; the challenges it sets; the opportunities it provides; the aspirations it embodies and the opportunities for it to support the exceptional, are all important aspects which when applied creatively to any development, can be its making.

Tools of the trade

It is necessary to arm oneself with:

- Documentation; National policy and guidance; visual assessment guidance; urban design advice and heritage guidance.
- One needs historic research, photographic surveys, the study of current and historic maps, mapping and fieldwork to understand the geometry of effects, experimentation using physical models and use of computer models in views, leading to accurate visual representations (AVRs) and the exercise of iterative design development.
- Personal skills are also important—visual memory, three-dimensional imagination, professional experience, ability to encourage development and refinement and understanding the art of limitation.

Methodology

Each practitioner needs to acknowledge their own skills and evolve their own methodology through experience. While benefiting from laid down criteria in written guidance, it is desirable to develop an instinct for the task. It is no coincidence that three of the top London townscape assessors all worked for either the Royal Fine Art Commission (RFAC) or the Commission for Architecture and the Built Environment (CABE). It is possible to be swamped by regulation, recommendation and guidance without

first understanding one's own approach and methodology for both "quantitative" and "qualitative" assessments in the visual field. The experienced practitioner, whose approach and methodology is again and again understood and respected for its efficacy and good judgement by local authorities and planning inspectors, can be confident that what is often described as a subjective approach is to a great extent objectified.

High quality

If a development is not of high design quality, when proposed for an historic environment, or one which has a direct effect on heritage assets either physically, or on its setting or on important views to or from it, there is little point in taking the assessment further. Even if the intervention is small, quality is the mark of acceptability and can be represented in an understated design just as much as it can be overtly apparent in a large scale development. It is the quality of thinking behind the design which is paramount. Poor quality design should never be accepted in relation to the heritage, if anywhere, and only when it is in any case not visible! High quality design is demanded in most policy and much guidance. In a recent public inquiry, where I presented evidence for the appellant, I was criticised for including the term "High Quality" in my evidence over 24 times. In rebuttal I was able to quote no less than five times where PPS 1 refers to high quality and the term exists in other national and regional policy and guidance. A precursor to my methodology, therefore, is the establishment of high design quality.

Defining high quality is not a fruitful exercise here, but identifying whether it exists in a given design is. While I accept that artistic interpretation and compositional detail can be subjective and indeed I support the freedom of the designer to take creativity to its conclusion, there is a baseline of quality which is measurable and objective and indeed proven by consensus.

There is of course also a point about appropriate quality. Each project requires a response which is appropriate to the circumstances of sensitivity or prominence. Different architects have varying levels of skill and I believe in "horses for courses", when it comes to advising clients on their choice. But superficial thinking and a shallow understanding of the consequences of a design can be identified swiftly by the expert and are not acceptable anywhere and certainly not in historic environments.

Policy and guidance

Certain policy must be aligned, such as PPSs 1 and 5, together with certain local planning policies. Much of the guidance, however, which it is essential to know and understand, should be either tempered to the circumstances or exceeded in its aspirations. There is no shortage of it!

The following are the principal documents:

- **European**

- Environmental Impact Assessment (EIA) Directive 1997 art.3 in accordance with arts 4 and 11.¹

- **National**

- The Planning Acts;
- EIA Regulations sch.4,² Preparation of Environment Standards (ES)—Good Practice Guide;
- By Design;

¹ Directive 97/11 amending Directive 85/337 on the assessment of the effects of certain public and private projects on the environment [1997] OJ L73/5.

² The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI 1999/293).

- Guidance for Landscape and Visual Impact Assessment;
 - Buildings in Context;
 - Conservation Practice;
 - Understanding Place;
 - Seeing the History in the View (draft);
 - The Setting of Heritage Assets (draft);
 - Tall Building Guidance;
 - What Makes a Good Building.
- **London**
 - London View Management Guidance 2010: Greater London Authority (GLA);
 - Metropolitan View Study: Westminster (draft).

To draw out some of the important but less obvious strands from these documents I will take them in turn.

- *EIA Directive*, emanating from the European Union, requires us to:
 - “identify, describe and assess in an APPROPRIATE MANNER, in the light of each individual case, the direct and indirect effects of a project on (edited) human beings and their interaction with material assets and cultural heritage.”
- *The Planning Acts*, prescribe the process for the designation of heritage assets, the presumption for their retention and the preservation or enhancement of their character or appearance, their setting and views affecting them. Development in heritage areas must therefore enhance either by better revealing the asset or by high quality sensitive design.
- *EIA Regulation sch.4* is transposed from the EU Directive and includes an Environment Statement (ES) Good Practice Guide. The relevant category is Cultural Heritage and Material Assets which:
 - “embraces history, archaeology, architecture and urban design and includes aspects not limited to material and economic value but extends them to human activities, ideas and spiritual and intellectual attitudes.”

It can legitimately be seen, therefore, as a subject area which among others includes—human perception, emotional response and the deep meaning which people attach to the visual and built environment around them.

- *By Design*, written by CABI for central government, provides very useful criteria for accessing quality but importantly declares that high quality design can, in certain circumstances, trump policy standards which are otherwise set down quantitatively.
- *Guidance for Landscape and Visual Impact Assessment*, written by the Landscape Institute suggests certain approaches and is open to others. While it considers urban situations, its emphasis is from a landscape point of view which assumes that the appearance of a project gives rise generally to an adverse effect. In an urban situation, a prominent or sensitively positioned building should always be designed to enhance heritage assets, their settings and the townscape to which they relate. Tall buildings must be of high design quality and in the hands of a designer capable of achieving such quality, will add fabric to the urban scene in a positive way. This would generally give rise, therefore, to a beneficial effect.

- *Buildings in Context* provide case studies of sensitive modern design which enhances the historic context. It shows that new designs can often appear in contrast to their context yet their high quality design approach is shown to provide a level of relationship and harmony such that both the old and the new enhance each other's appearance.
- *Conservation Practice* is a seminal document by English Heritage which in a simple way has provided a fundamentally important approach to analysing cultural values. This approach is as valid for the analysis of proposed new environments as it is for existing historic ones. The "values" section introduces the idea of a four-fold approach, separating out—evidential, historic, aesthetic and communal qualities. These qualities can be interpreted to effect a broader understanding of analysis, i.e.:
 - Evidential: physicality, materiality, purpose, size, origin etc.
 - Historical: relationship to time, seasonal, variety of use, pattern of use etc.
 - Aesthetic: design, appreciation, emotional response, raising of the spirit etc.
 - Communal: a shared emblem, sense of place, meaning, identification, ego etc.These value systems can assist in setting criteria for design performance and analysis.
- *Understanding Place* is a recent document from English Heritage for historic area assessments. It has a companion document for the planning and development context. It provides the researcher with a methodology for identifying historical and architectural developments and assigns values by identifying character areas as: exceptional, high, moderate, low or negative. It provides a check list of six research questions and a set of five criteria to establish relative significance.
- *Seeing History in the View* was a draft document by English Heritage which received a good deal of adverse comment. While the intention was worthy the suggested methodology was impractical. Its aim was to identify the heritage assets in any particular view, to assess the degree of relationship and continuity between them and where appropriate establish a sensitivity classification in relation to change. English Heritage has been working closely with the Greater London Authority (GLA) in developing this guidance in harmony with the London View Management Framework, hence its long delay.
- *The Setting of Heritage Assets* is a consultation draft only just out at the time of writing.
- *Tall Building Guidance* was produced jointly by CABE and English Heritage. It sets out 11 planning, design and heritage criteria against which proposals for tall buildings are to be tested. In summary it states that:

“any new tall building should be in an appropriate location, should be a first class design quality in its own right and should enhance the qualities of its immediate location and wider setting.”
- *London View Management Guidance* was first instigated by the Livingstone GLA administration as a result of the examination in public of the first London Plan. It was published in 2007 and gave a good deal of freedom for the then Mayor to support many schemes which, it is commonly thought, now threaten the London skyline. The new revised document is the result of the Johnson administration and it strengthens protection of views to major monuments and in particular World Heritage Sites which will receive silhouette protection. It identifies 26 places from where there are 53 views towards and across London within the categories: panoramas; linear views; townscape views and river prospects. Each view has a written management plan which identifies the important features in the view and which affords it a degree of protection while encouraging projects which further its enhancement. Other cities such as Edinburgh and Oxford are preparing their own versions.

- *The Metropolitan View Study* draft written by Westminster City Council is a borough based version of the LVMF which lists a number of additional townscape views. It includes a set of guidelines which aim to protect and/or manage certain views, mainly from inappropriate background intrusion. The draft will be amended now that the LVMF has been issued.
- *What Makes a Good Building* was written at the request of central government in 1994 by the Royal Fine Art Commission and represents the first acknowledgement from that level of governance, that design quality should be central to planning decisions. It proved to ministers that it was possible to develop criteria by which a design could be judged for its quality. It was material in dispelling the belief that architectural quality was merely subjective. Its thorough criteria for “integration” remain a useful tool.

Conclusion on guidance

This constitutes a considerable body of work, amount of advice and formulation of criteria for assessing change in the built environment and in relation to heritage assets. It is, however, uncoordinated in large part and leaves the practitioner to identify the appropriate criteria to suit the nature of the particular project. This is why I have already said that it is best to develop one’s own criteria for assessment in the first instance. To attempt to develop a “box ticking” exercise based on all, or a selection of the above would be to provide a confused and over wordy document in the same way that the draft of *Seeing History in the View* was in danger of doing.

PPS 5

A word or two about PPS 5 Planning for the Historic Environment. While the new policy broadens the base of consideration by the introduction of designated heritage assets on the one hand and non-designated assets on the other, it stresses the importance in decision-making that the level of significance of heritage assets generally, must be measured first so that the effect of intervention through development can be considered proportionately to that level. The definition of a heritage asset is one with “a degree of significance meriting consideration in planning decisions”. The practice guide defines it as one which “holds meaning for society over and above its functional utility”.

The definition of setting remains ambiguous, though simply put it is “the surroundings in which a heritage asset is experienced”. The practice guide assists in stating that:

“any development or change capable of affecting the significance of a heritage asset or people’s experience of it can be considered as falling within its setting.”

While it is influenced by more factors than just the visual, such as noise, dust and vibration, the setting “may change as an asset and its surroundings evolve or as understanding of the asset improves” (PPS 5 Practice Guide para.115). The recently issued draft document on “setting”, mentioned above, takes this further though it does so in a very general sense, through case studies, rather than providing a clear approach for decision makers. I will deal with my analysis of setting later. The pertinent clauses in the new policy relate to harm and loss of designated assets or elements of them and whether or not an intervention affects the designated asset “as a whole”. This is an important concept, though the wording of the policy could be tighter to provide absolute clarity on what is meant. In relation to visual assessment this concept is helpful. It helps to clarify how to consider effects on settings in regard to those designated assets which are areas, such as World Heritage Sites or Conservation Areas. For instance there may be an impact on a setting, but key for the decision maker to consider is, to what extent does it impact on the area. Does it affect it “as a whole”, or does it affect it in part, or momentarily or just in one particular view of, from or through the asset. Whether or not the impact on the asset is in part or “as a whole”, will not necessarily

constitute harm but considering the impact in this way can inform the decision maker whether the impact is fundamental to the setting as a whole or just an element of it. This will be informative about whether an intervention, making some impact, actually changes the setting of an asset as is intimated in the guide to the PPS and which is quoted above. On the whole the new PPS does push the science of visual impact assessment a little further forward through its emerging concepts.

Planning the assessment

While it is easy to identify the immediate context of a development proposal, and assess its effects, larger scale development will of course have an impact on a much wider area. Studying from where a development might be visible, either in glimpsed townscape views, focussed vistas, from broad open spaces or in relation to the views of designated heritage assets, is an important exercise from the start of the project. There is absolutely no good use in assessing a proposal only at the point when its form has been decided. It is necessary to carry out a continual assessment during the whole design development process.

What is required is a good map, knowledge of where there are heritage assets and public spaces, and a bicycle! The bicycle is the best way to experience and explore a particular built environment efficiently. Visual assessment cannot solely be a desktop exercise with a few computer generated images. It is exploratory and there are usually lots of surprises in such ventures. It is possible to place a light, at the proposed height of a development, into a computer model of a city or urban area and allow it to cast shadows across a plane set at 1.6 meters (eye level). Where the shadow is not cast, is where a view is possible. This is often called a “zone of visual influence”. Usually, trees are inaccurately depicted in computer models, and often a visually influenced area might not have the calibre of an urban view of significance.

It is recommended that there is no substitute for actually doing the fieldwork to discover the appropriate view places. Once viewing places are established it is important to choose a relevant viewpoint position which both typifies the experience from an area and provides the maximum exposure or maximum conjunction which the development will have with it.

After assembling a catalogue of viewpoints and identifying the likely performance of a development in each of the views, the designer can progress the design knowing what qualities will make it enhancing and harmless separately from the degree of impact. Those circumstances where the sensitivity of the place limits the ambitions of the development by virtue of dominance, overbearing or an unacceptable change of focus, are usually the viewpoints which determine its maximum height.

One must understand what is there in the view, how it varies with the seasons and time of day, how it is used and enjoyed by people, and what the historic relevance of the individual objects are within it. Also what it is that makes it beautiful, well composed, consistent or diverse or what particular landmarks dominate and indeed what is not so good and warrants improvement. And finally what makes it meaningful to people, the value they give it and why. This study then represents a “baseline” consideration. It involves much more than can be captured in a photograph.

Photography and AVR's

The use of photography to construct accurate visual representations (AVRs) is common practice but has been refined through the work of the LVMF. Set out in the new LVMF is a clear methodology which, I assume, will be adopted nationally. While it represents state of the art technology, it remains with shortcomings. No photograph can represent the real thing. Assessments must never be based on the AVR or the photograph. They must result from the real life, “real-time” experience on site, where our eyes adjust, zoom-in and zoom-out at will and our heads, indeed our whole bodies move in fine adjustment. The natural measurements of distance between objects are subconscious but possible in real life because

we experience townscapes spatially and in movement and memory. The photograph has no depth, no movement and by virtue of its small size, usually bound into a document, cannot begin to compete with the real experience.

The Landscape Institute recommends a 50 degree field of view. While this is the optimum field of view in terms of open landscapes, it cuts out too much of the context in urban views. In such views it is the townscape context, i.e. setting, against which any development is assessed. It helps if what is part of the assessment is shown in the photograph, so that the associated words have some kind of meaning. A 68–72 degree field of view is, therefore, commonly used. Held at a prescribed distance from the eyes this does represent an accurate view. Held in another position it may make the subject appear further away than it is in reality. A cropped version of the image can return it to a 50 degree field of view without a loss of accuracy.

Visual phenomena

It has been rightly suggested that vertical elements in a view appear particularly prominent, even elongated, in the real world. Experiments with Renaissance paintings of landscapes, related to photographs of the real view, show that the painter sub-consciously extended the vertical elements. While this is a fact, however, actual height is not as important in views as relative heights. The AVR is highly accurate in relative height terms.

A further dilemma is the turning of individual photographic images into a “panorama”. There is a computer-aided facility to accurately join up any number of photographs to form a panorama. The result, however, is to portray a visual image in two dimensions which the eye cannot reconcile with the real view. Only if the image can be curved and the observer put within, does it bear upon reality. It has to be very large to achieve this. The LVMF method is to standardise the so called panoramas by using either three or four photographs, each with a 40° field of view, placed with a small gap between them, to provide a 120° or 165° field of view.

The limitations of AVRs are particularly acute in relation to the kinetic effect. I have already mentioned that we experience townscapes in movement and memory. To assess an impact, there is no substitute for being on site and using the AVRs as a tool with which to interpolate the effect of an impact in movement. Inspectors at inquiries are very good at doing this in a thorough manner, planning officers invariably have insufficient time to do this properly and planning committee members hardly ever bother. A weakness, therefore, in our methodology is the need to be both thorough and economical in producing AVRs, which can cost up to £2k each to produce. This means that we must show the “worst case” views, i.e. views of maximum exposure to the development, and in doing so cannot adequately illustrate the kinetic and sometimes fleeting glimpse of the impact. One must, therefore, emphasise the written word of the assessment.

Written assessments

The written word is the main means of providing the decision maker with sufficient information about the impact and qualities of a development. I believe the written word and the use of the AVRs on site are the only way of setting out the facts which a decision maker needs. We are forced in Environment Statements to give each view studied, an impact rating. These can be tabulated and used statistically, which is why I avoid them if I can. They arise from the written statements and are inadequate as shorthand. These are categorised in quantum and quality as advised by the Landscape Institute’s guidelines. The quantitative can be rated at substantial, moderate, slight or no change; the qualitative at beneficial, adverse or no change. These words are often “abused” by the uninitiated. For instance the phrase “substantially beneficial” is often used which, though adequate English, misses the subtleties of the assessment which

are best found in the written assessments. I find it necessary to introduce a “neutral” rating for the qualitative realm, just as neutral has become common practice in rating a contribution or effect on character and appearance. In large projects or tall buildings I have also sometimes used the term “adverse mitigated”, meaning that it is only the quality of design which makes an otherwise adverse impact acceptable. If you expand these categories further to be able more accurately to reflect a fair assessment, you end up with the written assessments in any case. In my view there is no adequate shorthand for longhand informative assessments.

Now should these assessments be solely objective? Well, they should certainly be objective, but in my view there is value in also exploring what most people consider to be subjective. This needs to be differentiated and explained in the methodology. Subjective commentary can provide a particular opinion with which commentators can freely take issue, the important point being that it can raise the very issues which will “colour” the opinion of the decision maker. It will only be of value, however, if it is a subjective opinion made by an experienced professional in the field.

In my assessments, I make a clear distinction between:

- a description of the existing view, drawing out its relevant features, composition and historic importance;
- a description of how the development will change the view;
- the effect of that change, which includes some subjective aspects and;
- a statement giving clear reasons why the impact of the development will give rise to a “substantial” or “slight” quantitative impact and why it may be beneficial or adverse.

As I have mentioned before, the judgements employed in reaching the impact assessment conclusions are based not only on the quality of the design or on the way the development may change a townscape scene, but also on the planning intentions and aspirations for the site which might be the subject of a core strategy or site-specific supplementary planning guidance. I do not believe visual assessments can be fairly and fruitfully undertaken in the abstract or absent from intentions derived from the democratic process and public consultation.

It is however, for the decision maker to make a judgement with access to all relevant factors, visual assessment being one of many.

Views of heritage assets and setting

The consideration of visual effects when a new development is proposed in direct relation with a designated heritage asset or as part of its immediate setting is a relatively simple matter. It will have been the designer’s prime consideration in formulating the design and many examples exist, where it has been achieved with skill and imagination.

Visual assessment is more complex, however, where a conjunction between a heritage asset and the development takes place, which is not direct and which may only affect a single view of the asset. This is not necessarily a setting issue but concerns the assessment of a singular circumstance in one view. Such a conjunction can be the determinant of the height of the development. There are, however, many precedents where a high quality design has been accepted as a backdrop to highly graded designated heritage assets. What is important here is that the conjunction between the two objects is visually stimulating and each complements the other.

Prominent examples approved following public inquiries:

- The Shard in Southwark, a 306 meter high tower designed by Renzo Piano,³ which has a definite visual impact on the Tower of London WHS and the Grade 1 listed St Paul's Cathedral from the protected vistas from Parliament Hill⁴ and from Kenwood.⁵
- The Vauxhall Tower in Lambeth, a 180 meter high tower designed by Broadway Malyan Architects,⁶ which was visible above the Lady Chapel of Westminster Abbey in views from Parliament Street.
- No.1 and 2 Blackfriars Road in Southwark, two towers designed by Ian Simpson and Wilkinson Eyre,⁷ which were prominent in views from the bridge in the Grade 1 registered Royal Park of St. James's toward Horse Guards⁸ above the trees on Duck Island.
- Montevetro, Battersea Reach, Wandsworth, a 20 storey development designed by the Richard Rogers Partnership⁹ directly affecting the setting of the Grade 1 listed 18th century Church of St Mary. The building provides an immediate backdrop to the Church in views across the river from Cheyne Walk in Chelsea.
- Brighton Marina Development which included a 28 storey tower designed by Allies and Morrison,¹⁰ which formed a modest backdrop to the Grade I listed Regency Lewes Crescent in certain restricted views.

It may be true that the examples exemplify the very special circumstances of London. It is also true, however, that there are principles here of good design overcoming what could become barriers to achieving an improved environment for the future. At this point it would seem helpful to explore a concrete proposition which embodies the formulation of assessments on setting and its conceptual basis.

Setting of heritage assets: Westminster World Heritage Site

I have for some while been involved in the study of three separate proposals for high buildings at Vauxhall Cross where both the regional and local planning authorities foresee a regenerative cluster of high buildings being built. It is useful, in the context of this paper, to examine my approach to these projects in relation to the Westminster World Heritage Site in order to illustrate my views on setting.

The WHS principally consists of:

- The Palace of Westminster;
- Westminster Abbey and ancillary buildings;
- St. Margaret's Church.

These buildings are grouped, under the WHS designation, into two distinct parts with Abingdon Street separating them.

In my assessment, the above mentioned buildings were first fully reviewed and interpreted in their capacity as individual designated heritage assets (instead of listed buildings). The policy considerations for the WHS were also interpreted, while the effect on views into and out of Westminster Abbey and Parliament Square Conservation Area were also considered. The visual impact of the developments at Vauxhall on the WHS was then considered.

³ APP/A5840/V/02/1095887.

⁴ LVMF-2A.1.

⁵ LVMF-3A.1.

⁶ APP/N5660/A/03/1129667.

⁷ APP/N5660/A/10/2123877/NWF.

⁸ LVMF 26A.1.

⁹ LRP219/H5960/03.

¹⁰ APP/Q1445/A/09/210248.

The essential setting of the WHS

In determining whether the developments at Vauxhall adversely affect the essential setting of the World Heritage Site (WHS) it is first necessary to analyse what that setting is. The dictionary definition of setting states that: “[setting is] the place or type of surroundings where something is positioned or an event takes place” (The New Oxford Dictionary of English—1998).

PPS 5 Planning for the Historic Environment refers to the setting as “the surroundings in which an asset is experienced”. The developments in Vauxhall do not affect the essential setting of the WHS, in my view, but do affect, to a marginal degree, the setting of certain views in close relation to it. In particular, views from Parliament Square. PPS5 allows for development which affects the setting to be weighed against the benefit of that development in a proportionate way. The proposed developments will be seen from the setting but will not change or harm that setting, being some distance away. The development does not constitute, therefore, change within the setting of a designated asset.

While a tall building can have an impact on certain aspects of the setting it does not mean that by being visible from within the setting, it becomes a part of it. It is possible, therefore, to agree a boundary to the essential setting of a heritage asset if one accepts that views from it, over it, through it, and alongside it, are a different matter compared to a direct change proposed to its essential setting.

In analysing the essential setting of the WHS one is concerned with its visible setting, i.e. that which can be seen and experienced in combination with it. It could of course be said that the Westminster WHS’s setting is London as a whole or central London or the governmental centre within London. These, however, are abstract concepts which do not assist in the resolution of planning matters. The definition of setting that this study is concerned with is that essential group of buildings and spaces which bear upon the human senses as experienced spatially, in movement and in memory, while in the presence of the subject element (in this case the Westminster WHS). I include, therefore, all those buildings, which form a group with it, enclose open spaces which are adjacent to it, and which form important approaches to it. Hungerford Bridge, to the north, and Lambeth Bridge, to the south, are natural boundaries to the river aspect of the setting notwithstanding the fact that views of the WHS are possible from a greater distance. Where a heritage asset can be seen from, however, is not necessarily part of its setting. For example, though the Palace of Westminster is visible from Parliament Hill on Hampstead Heath, no part of the Heath is considered to be part of its setting.

The proposals for the development at Vauxhall will, to some extent, be visible from within the WHS and from Westminster Bridge, alongside the WHS. They will also be visible from Whitehall, looking towards Parliament Square, and from Parliament Square when viewed between the two parts of the WHS. Where distant development is visible, it may affect the setting of a particular view while not affecting the essential setting itself. Even Millbank Tower, a Grade II listed 20th century building much closer to the WHS, does not, in my view, affect the essential setting but it does affect the setting of views which include it.

The current wording of the guidance on setting in PPS 5 leads me to the view that development at Vauxhall cannot be considered as part of the setting of the Westminster WHS but that high buildings there may affect the setting of particular views from it, through it, alongside it or over it. The immediate and definable setting, therefore, is not at risk because of high buildings proposed at Vauxhall. What needs to be assessed is not the effect on the essential setting but on the setting of views from various positions. This is what has informed the basis for my visual impact assessments for tall buildings at Vauxhall.

I look forward to seeing if the recent draft by English Heritage, *The Setting of Heritage Assets* enlightens us further on the definition and many levels of complexity when considering the issue of setting.

Conclusion

The paper is titled “Establishing Criteria for Visual Assessment” because it cannot yet be established. This is because no one set of criteria fits all circumstances. The paper aims to show that a general approach is needed on which each practitioner can base their individual assessment methodology for the particular circumstances they are given. The criteria are not, therefore, established here. What I have attempted to show is how criteria are used in a selective way to fit the particular circumstances. It is important that the methodology must be clearly laid out and every effort made to ensure that it is read. The assessment, after all, is there to draw out all the facts about a development so that they can be fully debated, understood and a balanced judgement made by the decision-maker.