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CONVENTION CONCERNING THE PROTECTION OF THE WORLD
CULTURAL AND NATURAL HERITAGE

CONVENTION CONCERNANT LA PROTECTION DU PATRIMOINE
MONDIAL, CULTUREL ET NATUREL

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23 June - 2 July 2007 / 23 juin - 2 juillet 2007

Item 7 of the Provisional Agenda: State of conservation of properties inscribed on the World Heritage List and/or on the List of World Heritage in Danger.

Point 7 de l'Ordre du jour provisoire: Etat de conservation de biens inscrits sur la Liste du patrimoine mondial et/ou sur la Liste du patrimoine mondial en péril

MISSION REPORT / RAPPORT DE MISSION

World Heritage properties
Tower of London (United Kingdom) (488) / Tour de Londres (Royaume-Uni) (488)
&
Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom)
(496) / Palais de Westminster, l'abbaye de Westminster et l'église Sainte-Marguerite
(Royaume-Uni) (496)

1-3 November 2006 / 1-3 Novembre 2006

This mission report should be read in conjunction with Document:
Ce rapport de mission doit être lu conjointement avec le document suivant:

WHC-07/31.COM/7A

WHC-07/31.COM/7A.Add

WHC-07/31.COM/7B

WHC-07/31.COM/7B.Add

**REPORT OF THE JOINT UNESCO-ICOMOS REACTIVE MONITORING MISSION
TO
THE TOWER OF LONDON & WESTMINSTER PALACE, WESTMINSTER ABBEY
AND SAINT MARGARET'S CHURCH , UNITED KINGDOM
1 – 3 NOVEMBER 2006**

Acknowledgements

The mission would like to thank foremost the Minister of Heritage, Hon. David Lammy, and the Minister of Planning, Baroness Andrews for welcoming and informing the mission in London, and Mr. Harry Reeves and Mr. Peter Marsden of the Department of Culture, Media and Sports (DCMS), in charge of the overall organisation of the mission. During the meetings and on-site visits, the mission greatly benefited from the information and kind cooperation provided by many experts and professionals, in particular the Head of Planning and Housing, Mr. Andrew Melville; the Chair, Chief Executive and Head of World Heritage and International Policy of English Heritage, Sir Neil Cossons, Mr. Simon Thurley and Dr. Christopher Young; Ms. Jane Carlsen of the Greater London Authority; Mr. Peter Rees, City Planning Officer at the Corporation of London; the Site Managers of the Tower of London and the elected Representatives of the City of Westminster, led by Governor H.E. Keith Cima; Prof. Robert Tavernor, Director of the Cities Program of the London School of Economics; Prof. Derek Keene, Director of the Institute of Historical Research, University of London, accompanied by colleagues Prof. Stephen Daniels, Dr. Jeremy Ashby, Dr. Vanessa Harding, Dr. Simon Bradley and Dr. Elizabeth Williams.

EXECUTIVE SUMMARY

Following the concerns expressed by the World Heritage Committee (**Decision 30 COM 7B.74**), key for the mission was to understand and reflect upon the weight given to protection policies in UK national legislation as regards World Heritage versus policies for development in The London Plan and adjacent boroughs of the City, Southwark and Tower Hamlets.

The mission met with all of the key stakeholders, at the most senior level, including professional heritage entities, urban managers from the City of London and adjacent boroughs, historians and economists, who all underlined the importance of understanding the dynamic relationship between the Tower and its context, with the ever-changing nature of the Tower environs over at least the last 150 years as a significant aspect.

- A key issue is the tall buildings development strategy, which is actively promoted by the City of London, in harmony with the policies of the Mayor of London and the Greater London Authority (GLA), the result of which has been the submission and approval of various applications for tall buildings of over 100m. The GLA's policy is to cluster these as much as possible in the financial district of the City, located in the north-western backdrop of the Tower of London, and at transport hubs such as Waterloo Station. In practice, however, tall buildings have been approved in a wider area surrounding both World Heritage sites, indicating a trend towards spreading out instead of clustering.
- Arguments, therefore, currently put forward in favour of high-rise urban development around the London World Heritage sites seem not always consistent and clear, resulting in confusion among stakeholders.
- New urban development carried out so far has had considerable impact on the visual integrity of both the Tower of London and Westminster World Heritage sites. The planned

construction of the “Minerva Tower” (Houndsditch, 216m), located in the far eastern side of the City with a significant impact on the Tower of London, was fortunately cancelled, thereby averting a major threat.

- There are some gaps in national legislation and local regulations relating to the protection of World Heritage sites in respect to the implementation of the World Heritage Convention. There are currently inadequate guidelines and no impact assessment tools for new urban development in Greater London.

In order for these issues to be properly addressed, there is a need to finalise the Management Plans for the Tower of London and Westminster and for them to be formally adopted by the Greater London Authority and taken into account when implementing the ‘London Plan’, the Spatial Development Strategy for Greater London.

The mission was informed of the following actions currently underway, which could improve the protection of the London World Heritage sites:

- The Secretary of State for Culture, Media and Sports (DCMS) is due to publish a White Paper on Heritage Protection in March 2007 that will set out proposals to clarify and possibly strengthen protection for World Heritage sites;
- English Heritage and the Commission for Architecture and the Built Environment (CABE), the Government’s statutory advisers on the historic environment and architecture, have updated their guidance on tall building developments, which is currently out for public consultation until 1 May 2007;
- Working Groups have been established, which are in the process of drafting management plans for the Tower of London and Westminster World Heritage sites;
- Proposals for revised view protection of the Tower of London have been put forward in the London Plan (‘The London View Management Framework’ – Draft SPG), which is currently out for consultation;
- For the Westminster World Heritage site a comprehensive skyline study is in preparation.

The mission considered *Operational Guidelines* paragraphs 178-186 (the List of World Heritage in Danger) and 192-198 (Procedure for the eventual deletion of properties from the World Heritage List), and established that:

- In terms of ‘threatening effects of town planning’ (§ 179 b. iv) the imminent or potential dangers to the Tower of London posed by the approved planning applications for the Minerva Tower (Houndsditch, 216m) and the London Bridge Tower (“Shard of Glass”, 303m) were partially averted, due to the cancellation of the Minerva Tower project, which was positioned in the iconic view from the South Bank towards the Tower of London. The “Shard of Glass”, however, remains a potential danger, the impact of which is difficult to assess due to an absence of a detailed skyline study of the Tower, its setting and views.
- As regards ‘modification of juridical status of the property diminishing the degree of its protection’ (§ 179 b. i) or ‘lack of conservation policy’ (§ 179 b. ii), improvements seem underway in policies to protect London World Heritage sites, in particular the foreseen publication of the DCMS Secretary of State’s White Paper on Heritage Protection, the proposal for view protection of the Tower of London, as put forward in the London Plan (‘The London View Management Framework’–Draft SPG), and the current drafting of the Management Plans for the Tower of London and Westminster.

In light of the above assessment, the mission concluded the following:

For the Tower of London World Heritage site:

- If either a statutory protection for the iconic view from the South Bank towards the Tower, which is key to the conservation of the visual integrity of the Tower, has not been established by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand);
- Or the Management Plan, including a protection of the immediate surroundings of the Tower through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand), **then the site would meet the criteria for Danger Listing** (according to paragraphs 178-182 of the *Operational Guidelines*).

For the Westminster World Heritage site:

- If either a dynamic visual impact study, to facilitate a thorough and rapid assessment of future planning applications, has not been developed by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand);
- Or the Management Plan, including a protection of the key views and immediate surroundings of the site through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand), **then the site would meet the criteria for Danger Listing** (according to paragraphs 178-182 of the *Operational Guidelines*).

1. Background to the Mission

At the invitation of the Government of the United Kingdom (by letter dated 27 June 2006), a joint UNESCO World Heritage Centre–ICOMOS mission took place to the *Tower of London* from 1 to 3 November 2006. It reviewed approved, as well as proposed development projects around the World Heritage property, in particular their possible impacts on significance, setting and views to and from the inscribed site, assessed if these were a threat to the Outstanding Universal Value and, as a consequence, if the property met the criteria for Danger listing.

Given the concern of the World Heritage Committee also for the visual integrity of the World Heritage site of “Westminster Palace, Westminster Abbey and St. Margaret’s Church” (inscribed in 1987 and in this report referred to as Westminster), relating to development schemes for tall buildings currently pursued by several of the London boroughs surrounding the site, the mission reviewed state of conservation and related issues of this site at the same time.

Decision 30 COM 7B.74 adopted by the World Heritage Committee at its 30th session, June/July 2006:

The World Heritage Committee,

1. Having examined Document *WHC-06/30.COM/7B*,
2. Recalling Decision **29 COM 7B.89**, adopted at its 29th session (Durban, 2005),
3. Notes with great concern that proposed new developments around the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church World Heritage properties, appear not to respect the significance of either World Heritage property, their settings and related vistas;
4. Regrets that the London Plan policies to protect the World Heritage property and its environment do not seem to be applied effectively, that statutory protection for views to and from the Tower could be diminished, and that the management plan has still not been finalised;
5. Deeply regrets that the requested in-depth study on the possible impact of development projects in the immediate vicinity of the World Heritage property has not been submitted and that no detailed skyline study of the Tower, its setting and views has yet been carried out and urges the State Party to carry out such a skyline survey as soon as possible to provide a qualitative framework for assessing the impact of new development on views and setting that contribute to the outstanding universal value of the Tower;
6. Requests the State Party to invite a joint World Heritage Centre/ICOMOS monitoring mission to assess the impact of current planning proposals and **to review the possibility of inclusion of the property in the List of World Heritage in Danger**, including benchmarks and timeframes for corrective action;
7. Also requests the State Party to provide the World Heritage Centre with an updated report, by **1 February 2007** on the progress of its undertakings in this area, and on the state of conservation of the property, for examination by the Committee at its 31st session in 2007.

2. Main Aspects for review and discussion as identified in the Terms of Reference

- Review the overall situation of the property of the Tower of London with regard to the state of conservation of the site in its widest urban context, its integrity and authenticity, and how current construction projects in its neighbourhood may affect the Outstanding Universal Value of the site;
- Discuss with national and local authorities how the existing high-rise buildings and any construction plans affect the Outstanding Universal Value of the site; and more specifically new developments around the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church World Heritage properties;
- Discuss with relevant authorities, local institutions and organisations the protection of the historic urban landscape and its visual integrity in relation to the "Declaration on the Conservation of Historic Urban Landscapes" as adopted by the General Assembly of States Parties to the *World Heritage Convention* in October 2005;
- Consider how London Plan policies to protect the World Heritage property and its environment could be applied more effectively regarding the development plans of Tower of London and if possible Westminster Palace, Westminster Abbey and Saint Margaret's Church, and in view of an integration into an overall concept for the protection and development of the World Heritage properties in London;
- Evaluate the city authorities' overall urban development scheme, with special emphasis on the high-rise developments, in terms of its possible impacts on the two World Heritage

properties in London, and review any elements available for the detailed skyline study of the Tower, its setting and views;

- Discuss opportunities for co-operation on conservation management and development and exchange of experiences with other World Heritage sites;
- Prepare a detailed report by 15 December 2006 for review by the World Heritage Committee considering Operational Guidelines paragraphs 178-186 (the List of World Heritage in Danger) and 192-198 (Procedure for the eventual deletion of properties from the World Heritage List), specifically reviewing the possibility of inclusion of the property in the List of World Heritage in Danger, including benchmarks and timeframes for corrective action, and submit the report to the World Heritage Centre in electronic form (not exceeding 10 pages).

3. Considerations by the World Heritage Committee, 30th session, Vilnius (Lithuania), July 2006

The State Party submitted a report for the site on 30 January 2006, which was reviewed by the World Heritage Centre and ICOMOS. Four main issues were identified (extract from the Working Document WHC-06/30.COM/19):

- a) Two tall buildings which impact on the Tower have been given planning permission and further high-rise buildings are being considered, which could impact adversely on critical views of and from the Tower;
- b) Policies to protect London World Heritage sites within the London Plan currently seem not to be applied effectively;
- c) Revised planning guidelines on London views, currently out for consultation, could limit the protection of views around the Tower;
- d) The management plan for the Tower of London, which should strengthen protection for this site, has not yet been finalised or approved by the relevant authorities.

4. Inscription History of the Tower of London

The Tower of London was inscribed in 1988 during the 12th session of the World Heritage Committee, based on Cultural criteria (ii) and (iv):

- Criterion (ii): A monument symbolic of royal power since the time of William the Conqueror, the Tower of London served as an outstanding model throughout the kingdom from the end of the 11th century;
- Criterion (iv): The White Tower is the example par excellence of the Norman castle in the late 11th century and the ensemble of the Tower of London is a major reference for the history of medieval military architecture.

The Statement of Significance as described in nomination file C 488 consists in principle of three aspects: a) The Tower of London was first built by William the Conqueror for the purpose of protecting and controlling the city (i.e. symbolic value); b) Of the present buildings the White Tower survives largely intact from the Norman period, and architecture of almost all the styles which have flourished in England since may now be found within the walls (i.e. scientific value); and c) The Tower has been, and still is, a fortress and a royal palace, and was for

centuries the arsenal for small arms, the predecessor of the existing Royal Armouries, and as one of the strongest fortresses in the land, has from early times guarded the Crown Jewels (i.e. historic value).

During the mission, the Tower's Statement of Significance was discussed with representatives of Historic Royal Palaces (HRP) in charge of the site's conservation and management. They stated that in fact since the 1960s its setting had been compromised, due to the construction of several tall buildings around the City of London, of which St. Guys Hospital (1974, 143 m) and the NatWest Tower (1980, 183 m) were perhaps the most controversial. While they argued that the wider surroundings of the Tower today are considered of importance in order to appreciate the monument to the fullest, it was also underlined that the site has always been a fort in an urban setting: "the interaction between the Fortress and the City has always been there, has always been complex, and will always be changing."

The Advisory Body's observations on the nomination clearly refer to issues outside the boundaries of the proposed site for inscription, which were affecting the property. ICOMOS "draws the Committee's attention to the inconsistent value of the surroundings of the Tower of London. Alongside certain remarkable and historically valuable elements, such as the Tower Bridge, outsized buildings have increasingly been built in the Docks area. The most regrettable one is the Tower Hotel, which seriously modifies the urban landscape in the St. Katherine's dock area and diminishes the monumental value of the Tower of London. ICOMOS expresses the wish that the Committee recommend that the United Kingdom authorities make strenuous efforts to protect the surroundings of the Tower of London in order to prevent any further abuse of this nature". (ICOMOS Recommendation on nomination C 488 'Tower of London', May 1988)

Subsequently, the Bureau of the World Heritage Committee at its session in 1988 recommended inscription of this property "on condition that assurances be given that the area surrounding the Tower of London is duly protected by the British authorities so that the site and its environment are safe-guarded without further damage". The World Heritage Committee at its 12th session in 1988 "expressed its regrets regarding the building of the Tower Hotel, which would have best been avoided, and took note of the assurances of the United Kingdom authorities as to protection henceforth to be granted to the environment of the Tower of London."

5. Inscription History of Westminster Palace, Westminster Abbey and St Margaret's Church

Westminster Palace, Westminster Abbey and St Margaret's Church were inscribed in 1987 during the 11th session of the World Heritage Committee, based on Cultural criteria (i), (ii) and (iv):

- Criterion (i): Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.
- Criterion (ii): Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin at Westminster Palace, in the "Gothic Revival" of the XIX century.
- Criterion (iv): The Abbey, the Palace and St. Margaret's illustrate in a concrete way the specificities of parliamentary monarchy over as long a period of time as nine centuries. Whether one looks at the royal tombs of the chapter house, the remarkable vastness of Westminster Hall, of the House of Lords or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

6. National Policy for the Preservation and Management of the World Heritage Property

Planning Policy Guidance 15 (PPG 15) on Planning and the Historic Environment lays out government policies for the identification and protection of historic buildings, conservation areas, and other elements of the historic environment. It explains the role of the planning system in the protection of the historic environment and provides guidance to local authorities on its management, including listed buildings and conservation areas, in relation to the national planning system.

For the moment, no additional statutory controls follow from the inclusion of a site in the World Heritage List although, in accordance with the guidance, the outstanding international importance of a World Heritage Site as a key material consideration must be taken into account by local planning authorities in determining planning and listed building consent applications. Local authorities should also formulate specific planning policies for protecting these sites and include these policies in their development plans.

The mission was informed that the Secretary of State for Culture, Media and Sports is due to publish a White Paper on Heritage Protection in March 2007 that will set out proposals to clarify and possibly strengthen protection for World Heritage sites. In any case, significant development proposals affecting World Heritage sites generally require a formal environmental assessment to ensure that their immediate impact and their implications for the longer term are fully evaluated (PPG 15, Paragraphs 2.22, 2.23, 6.35, 6.36 and 6.37).

More in particular, policies have been in place since a long time for the protection of the views to and from St. Paul's Cathedral, with substantial positive results, and the Greater London Authority has prepared a 'London Views Management Framework', a protection scheme for the main London landmarks (not yet in force), that identifies and protects the main views of Westminster Palace and the Tower of London. For the Tower, however, this will mean less protection than before as the mission noticed that the proposed protection for this property will only extend to an area directly surrounding the World Heritage site, but won't ensure full protection of the Tower's backdrop as seen from the South Bank of the River Thames in case of tall buildings; similar gaps existed for the protection of the views to and from the urban landscape of Westminster, especially on the South Bank. This London Views Management Framework is currently under review and the Government is about to receive proposals from the Greater London Authority for new directions. If approved, it will be important to establish exactly to what extent the view of the Tower of London will be protected under these new directions.

The City has actively promoted, in harmony with the policies of the Mayor of London (GLA), a tall buildings development strategy in the eastern section of its territory, coinciding with the financial district. This section in fact is the only one where high-rise development could take place, as the rest of the territory of the City is protected by different types of norms and policies. One existing tall building, Tower 42 (183m), has recently been refurbished and the Swiss Re building by Foster, dubbed "The Gherkin" (180m), was completed in 2004; another tower, 51 Lime Street (by Foster, 141m), is currently under construction. Several other tall buildings have received planning permission or are currently under study, the most important would certainly be the Bishopsgate Tower (by Kohn Pederson Fox Associates, 288m), which would also represent the visual focal point of the entire cluster of tall buildings in the City of London.

The main rationale for development of tall buildings is to increase density of office space to limit loss of fiscal revenues and jobs, due to the growth of the financial district of Canary Wharf in the Docklands area east of London. The result of these development policies has been the

submission and approval of various applications for tall buildings of over 100m, several of them around the Tower of London, including the approvals for the London Bridge Tower (“Shard of Glass”, 303m) and the Minerva Tower (Houndsditch, 216m, that has been cancelled), which were reviewed by the World Heritage Committee (WHC-06/30.COM/7B.74).

The power of the government agency English Heritage to intervene in the strategic planning process of Greater London, in the interests of World Heritage sites preservation, seems at critical times to be limited and only formal. The definition of “material harm”, which needs to be demonstrated in order to arrest the planning process, is a surprisingly narrow interpretation related to cultural heritage values as recognized in various international conventions and charters, among others the 1976 UNESCO Recommendation concerning the Safeguarding and Contemporary Role of Historic Areas, the 1987 ICOMOS Charter for the Conservation of Historic Towns and Urban Areas (Washington Charter), 2005 Vienna Memorandum, and the Declaration on the Conservation of Historic Urban Landscapes adopted at the General Assembly of States Parties to the *World Heritage Convention* in October 2005.

Although “high quality design requirements” are officially in place, new development is not subjected to a rigorous and complex design impact assessment based on guidelines related to the overall cultural environment. Parts of the Vienna Memorandum have been interpreted locally as a justification for “minor change” on cultural values in order to support economically and commercially-oriented projects declared to be in the public interest. This overlooks and simplifies the complex values of the historic urban landscape as a unique context for new development.

Furthermore, management bodies responsible for the World Heritage sites have limited powers to intervene in the process when development is foreseen in the immediate or wider surroundings of the sites, further hampered by an absence of approved management plans covering the complexity of cultural values, both tangible and intangible – a clear gap in the application of the World Heritage Convention.

7. State of Conservation of the Tower of London and Westminster World Heritage Sites

The state of conservation of the Tower of London World Heritage site is outstanding: if *World Heritage* is all about identification, protection, conservation, presentation and transmission to future generations of heritage assets, than the Tower of London can be considered exemplary. Drawing over 2 million visitors a year, it is the most visited site in the United Kingdom, with a staff of 630 and an annual turn-over of 60 million Euros, which makes it self-supporting without any outside funding from Government or donors. It spent 1,4 million GB pound (USD 2,8 million) on conservation last year and is scheduled to spend 2,5 million GBP coming year. Each year it receives 60,000 school visits, 20,000 of them on specially designed “taught sessions”. Increasingly work is undertaken to include youth and ethnic minority groups, since the adjacent boroughs house many immigrant communities.

Since the elaboration of a Master Plan for the Tower Environs in 1999, 22 million GB pounds (USD 44 million) have been spent on improving access, circulation and presentation of the World Heritage site, with remarkable results. Only minor issues remain, such as a planned removal of the existing trees on and around the premises of the Tower, which have been damaged by recent storms and are negatively affecting the stability of local soils. The mission discussed the need to have trees replanted in order to make the monument better ‘stand out’ visually against its urban backdrop.

While a detailed Management Plan for the site was prepared in 2000, during consultation rounds it was “not well-considered”, delaying its final approval and implementation. The mission was notified that currently the Tower of London Management Plan is at an advanced stage of drafting and that sections of the Management Plan, which set out the geographical boundary of the defined local setting and proposals for managing development in this area, are currently under consultation between a range of stakeholders, including Historic Royal Palaces, the Greater London Authority, English Heritage, the London Borough of Tower Hamlets and the City of London Corporation, although as yet there’s no formal agreement. Further to these planning instruments, there’s a Tower Gateway Development Framework & Investment Strategy outlining economically viable development compatible with the historic setting.

The World Heritage site of Westminster, which encompasses the Palace, the Abbey and St. Margaret’s Church, is in an equally fair state of conservation and well-managed, certainly given its intense public use. Minor issues include the new security measures that have been put in place recently to protect the Parliament with negative effects on the aesthetics of the area, while the riverside of the Palace is being disturbed by temporary restaurant facilities built on the terrace for the use of the Houses, for which a more appropriate solution should be found.

8. Identification and Assessment of Issues in the Wider Setting of the World Heritage Site

During the mission, various meetings were organized with professional heritage entities, urban managers from the City of London and adjacent boroughs, historians from academia, and economists promoting investment and development. Interestingly, all underlined the importance of understanding the dynamic relationship between the Tower and its context, with the ever-changing nature of the Tower environs over at least the last 150 years as a significant aspect. The urban structure of London, it was explained, has always consisted of a conglomeration of competitive boroughs, not centrally guided and quite unique in historic cities. Thus, key for the mission was to understand and reflect upon the weight given to protection policies in UK national legislation as regards World Heritage versus policies for development in The London Plan and adjacent boroughs of the City, Southwark and Tower Hamlets.

The process put in place is elaborate and complex, with a three-tier structure National Policy – Regional Plans (Strategies) – London Borough Local Plans. Each of London’s 33 boroughs produces local plans and planning permission is needed for each development proposal before any intervention can take place. Applications for development proposals are dealt with at the local (borough) level, with a right of appeal should it be rejected, by which it then enters in the sphere of public inquiry with a role of the Secretary of State for Communities and Local Government: “there exists a broad power of Ministers to intervene.” Principal requirement during a public inquiry is to demonstrate that a development proposal does, or doesn’t do “material harm to listed buildings.”

Here professional heritage entities in advisory roles have fallen short in several cases that were widely considered damaging to the visual integrity of the Tower of London. These included the planning applications for the Minerva Tower (Houndsditch, 216m) and the London Bridge Tower (“Shard of Glass”, 303m), due to a lack of adequate tools to assess visual impacts on qualities and values of cultural heritage, and thus (visual) damage to listed buildings. Furthermore, it seems that each new planning application is considered in isolation, despite the fact that several new developments taken together can have a magnified impact on the deterioration of cultural values.

English Heritage, realizing it did not have the appropriate tools to deal with the issue effectively, in particular during public inquiries, is currently developing a new assessment tool

to strengthen and clarify the nature of the values to be protected. Furthermore, English Heritage and the Commission for Architecture and the Built Environment (CABE), the Government's statutory advisers on the historic environment and architecture, urban design and public space respectively, have updated their guidance on tall building developments. This document is now out for public consultation until 1 May 2007. It contains specific references to tall building developments which potentially impact on World Heritage sites. This document is a revised version of an earlier publication and its purpose is to provide advice and guidance on good practice in relation to tall buildings in the planning process. It further sets out how English Heritage and CABE will evaluate proposals for tall buildings.

The London Plan, a Spatial Development Strategy for Greater London established by the Greater London Authority in February 2004 and promoting the vision of the Mayor of London, outlines in Policy 4B.13 on World Heritage sites that the "Mayor will work with the relevant boroughs, English Heritage and site owners and occupiers to prepare management plans for London's World Heritage sites" and that these "management plans should protect their historic significance and safeguard, and where appropriate enhance, their settings." Thus, while in theory policies, processes, and partnerships are firmly established, with a role and responsibility for every stakeholder, the interpretation and implementation of these policies in practice can result in approval of controversial planning applications, which leads to intense debates and an increasing polarization of civil society as regards heritage conservation issues (ref. 'Press Coverage Tall Buildings', 2005-2006). It is expected that the Secretary of State's White Paper on Heritage Protection will improve this situation in setting out proposals that clarify and possibly strengthen the protection for World Heritage sites.

Although the area surrounding the World Heritage site of Westminster has seen a number of alterations since its nomination, the historic urban landscape is almost intact, with the exception of the Millbank Tower (dating from 1961, 117m in height and visible from the bridge and the South Bank of the Thames) and the London Eye, a 135m high observational wheel almost in front of the World Heritage site. With a number of new development schemes recently approved and proposed, a potential threat to the visual integrity of the site may have been created. In particular "The Three Sisters" adjacent to Waterloo Station (a redevelopment of Elizabeth House in a cluster of 3 tall buildings of 140m), Beetham Tower in Southwark (226m), and Doon Street Tower in Lambeth (168m) would all be visible from Parliament Square. The mission discussed the need for a comprehensive skyline study to determine actual threats and impacts, as requested by the World Heritage Committee, and was informed that preparations for such a study were underway.

9. Conclusions and Recommendations

The overall state of conservation of both the Tower of London and the site of Westminster is good, with only minor issues affecting the site such as new structures for security recently been put in place (Westminster) and planned removal of trees (Tower). In conclusion, no major problems were identified inside both World Heritage sites.

A tall buildings development strategy is actively being promoted by the City of London, in harmony with the policies of the Mayor of London (GLA), of which the result has been the submission and approval of various applications for tall buildings of over 100m, several of them around the Tower of London clustered in the City.

Of the two cases discussed by the World Heritage Committee last year, in particular the planned construction of the Minerva Tower (Houndsditch, 216m) could be considered an imminent danger, as the building site was located in the far eastern side of the City in the direct backdrop

of the Tower of London, and therefore with a significant impact on the World Heritage site. Fortunately, the developers have cancelled the project for a tall building, due to financial considerations. This has averted a major threat, as this tall building would have destroyed the remaining iconic view from the South Bank towards the Tower of London.

The mission concluded that it is essential for the UK authorities to close the existing gap between theory and practice, between UK national policy on World Heritage and its interpretation and implementation at the local level, which has recently led to inconsistencies and confusion.

Finalization of the Management Plan of the Tower of London and its Environs is key and in this Management Plan supplementary planning guidance should be provided to statutorily protect the remaining iconic views of the Tower, being from the south and south-west, both over the River Thames. These views have been identified in 'The London View Management Framework' and are currently out for consultation.

For the Westminster World Heritage site the comprehensive skyline study currently in preparation should determine which views to and from the site are critical for maintaining the site's integrity and for appreciating its setting to the fullest. Until this study has been finalized and further protective measures are in place, proposed new development could impact adversely on the values of the World Heritage site.

The mission considered *Operational Guidelines* paragraphs 178-186 (the List of World Heritage in Danger) and 192-198 (Procedure for the eventual deletion of properties from the World Heritage List), and concluded that:

- In terms of 'threatening effects of town planning' (§ 179 b. iv) the imminent or potential dangers to the Tower of London posed by the approved planning applications for the Minerva Tower (Houndsditch, 216m) and the London Bridge Tower ("Shard of Glass", 303m) were partially averted, due to the cancellation of the Minerva Tower project, which was positioned in the iconic view from the South Bank towards the Tower of London. The "Shard of Glass", however, remains a potential danger, the impact of which is difficult to assess due to an absence of a detailed skyline study of the Tower, its setting and views.
- As regards 'modification of juridical status of the property diminishing the degree of its protection' (§ 179 b. i) or 'lack of conservation policy' (§ 179 b. ii), improvements seem underway in policies to protect London World Heritage sites, in particular the foreseen publication of the DCMS Secretary of State's White Paper on Heritage Protection, the proposal for view protection of the Tower of London, as put forward in the London Plan ('The London View Management Framework'–Draft SPG), and the current drafting of the Management Plans for the Tower of London and Westminster.

In light of the above assessment, the mission concluded the following:

For the Tower of London World Heritage site:

- If either a statutory protection for the iconic view from the South Bank towards the Tower, which is key to the conservation of the visual integrity of the Tower, has not been established by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand);
- Or the Management Plan, including a protection of the immediate surroundings of the Tower through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch,

New Zealand), **then the site would meet the criteria for Danger Listing** (according to paragraphs 178-182 of the *Operational Guidelines*).

For the Westminster World Heritage site:

- If either a dynamic visual impact study, to facilitate a thorough and rapid assessment of future planning applications, has not been developed by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand);
- Or the Management Plan, including a protection of the key views and immediate surroundings of the site through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session (June 2007, Christchurch, New Zealand), **then the site would meet the criteria for Danger Listing** (according to paragraphs 178-182 of the *Operational Guidelines*).

In view of these conclusions, for the **Tower of London World Heritage site** the mission recommends the following:

1. The existing trees on and around the premises of the Tower, which will be removed in the short term, should be replaced with a new vegetation screen in order to create a visual buffer between the Tower and its surroundings. Together with an overall cleaning of the White Tower, this would make the monument better ‘stand out’ visually against its urban backdrop.
2. The Greater London Authority should strictly adhere to its policy of promoting tall buildings and concentrating them in the City of London, thereby limiting the impact on the Tower of London’s surrounding urban landscape. The mission is of the firm view that establishing a statutory protection for the iconic view from the South Bank towards the Tower, to keep the last remaining visual axis unobstructed, is key to the conservation of the visual integrity of the Tower.
3. The Management Plan for the Tower of London should be finalized by June 2007, in time for it to be presented during the 31st session of the World Heritage Committee, which should include a protection of the immediate surroundings of the Tower through an adequate and commonly agreed buffer zone, which would allow better guidance as regards height and bulk of future planning applications. This plan must be incorporated in the Greater London Authority’s London Plan.

For the **World Heritage site of Westminster**, the mission further recommends:

4. Since planning permissions have been granted or are under consideration for several tall buildings, the mission would strongly recommend adhering to the policy of limiting the new development of tall buildings to the financial district, i.e. the City of London.
5. To review the approved and proposed schemes of “The Three Sisters” adjacent to Waterloo Station (a redevelopment of Elizabeth House in a cluster of 3 tall buildings of 140m), Beetham Tower in Southwark (226m), and Doon Street Tower in Lambeth (168m) in the surroundings of Westminster, including the South Bank, and to adjust them in order to ensure the visual integrity of the World Heritage site.
6. To present to the World Heritage Committee a dynamic visual impact study for the World Heritage site of Westminster to facilitate a thorough and rapid assessment of future planning applications.

7. The Management Plan for Westminster should be finalised by June 2007, in time for it to be presented during the 31st session of the World Heritage Committee, which should include a protection of the key views and immediate surroundings of the site through an adequate and commonly agreed buffer zone, which would allow better guidance as regards height and bulk of future planning applications. This plan must be incorporated in the Greater London Authority's London Plan.

**Annex 1. Members of the joint UNESCO-ICOMOS-IUCN mission to
The Tower of London (United Kingdom)**

Mission dates: 1-3 November 2006

UNESCO	Mr. Francesco Bandarin Director of the World Heritage Centre
	Mr. Ron Van Oers Programme Specialist – Coordinator World Heritage Cities Programme
WH Committee	Mr. Tumu Te Heuheu Chairperson of the World Heritage Committee
	Mr. Alexander Gillespie Special Advisor of the Chair
	Mr. John Paki Special Advisor of the Chair
ICOMOS	Mr. Jaroslav Kilian

**Annex 2. Itinerary for UNESCO-ICOMOS Mission
to the Tower of London 1-3 November 2006**

Day 0 – Tuesday 31st October: Arrival of Mission

08.10 Mr Kilian - Stansted Airport
18.56 UNESCO Mission arrives from Paris [Eurostar]

Transfer to Hotel – Royal Horseguards Hotel

Day 1 – Wednesday 1st November: DCMS

08.45 Escort delegation from hotel to GOL Millbank [DCMS].

09.00 Arrive at GOL - Room 11.2B3

09.15 Welcome and Introduction

[Harry Reeves, DCMS. Chair] [5 mins]

Aim of the Mission and Role of the Delegation

[Francesco Bandarin, Director of the World Heritage Centre] [10 mins]

Outline of Itinerary

[Harry Reeves, DCMS] [10 mins]

Run through and confirm Mission content with programme

09.40 Presentation 1: London and the Tower – Introduction/ Inscription Context

[Dr Christopher Young, EH] [15 mins]

Changing and developing city; Tower as a feature of the area developing significantly since 1910; issue of intensification not development since inscription

09.55 Presentation 2: Framework of Planning Policies (national, regional and local)

[Andrew Melville, GOL] [30 mins]

Outline of planning system in UK - how present planning systems operate and decisions taken; planning policy guidance.

10.25 Presentation 3: London Plan and View management Framework

[Debbie McMullen/Jane Carlsen, GLA] [15 mins]

10.40 Coffee

10.50 Presentation 4: Further steps for Protecting World Heritage Sites

- (i) Borough plans; planning revisions and local development frameworks
[Andrew Melville/Roger Chapman GOL] [5 mins]
- (ii) Historic Protection Review
[Harry Reeves, DCMS] [10 mins]
- (iii) Tall buildings guidance and methods of notifying WHC of development
[Dr Christopher Young, EH] [15 mins]

11.20 **Presentation 4: City of London - Development Trends**

[Peter Rees, City Planning Officer - City of London Corporation [15 mins]

11.40 **Presentation 5: Cases - Review of Development Proposals**

[Andrew Melville/Roger Chapman, GOL] [20 mins]

Individual cases of concern to UNESCO; live cases – update of development proposals; what’s coming up in near future (cross-ref. new buildings dossier/photos); rationale for decisions.

1200-13.20 Lunch/discussion

1320-13.50 Travel time/security (if needed)

14.00-15.00 **Meeting: Ministers (Baroness Andrews/David Lammy)**

[venue -Palace of Westminster Committee Room 4]

Role of DCMS and DCLG Ministers; State Party commitment to UNESCO, WH Convention and fulfilling obligations under it; context of planning decisions - regard to national and local policies, high quality buildings; synergy between ancient and modern construction - balancing needs of organic and economic growth of ever developing and important capital city with needs for proper management and preservation of the heritage.

15.00-15.30 [Palace of Westminster – views from the Terrace]

15.30- 16.00 Travel time

16.00-17.00 English Heritage – Bunhill Row

**Meeting: Sir Neil Cossons, Chair EH
and Simon Thurley, Chief Executive, EH**

English Heritage Perspective

1700-18.30 Preliminary/Orientation Tour of Area

18.30 Return to hotel

Day 2 – Thursday 2 November: Tower of London

- 08.30 Escort delegation from hotel to Tower of London [DCMS].
- 09.00 Arrival at Tower
- 09.15 **Welcome and Introduction**
[Keith Cima, Resident Governor of the Tower of London] [5 mins]
- 09.30 **Presentation: The Tower of London in its setting**
- Why inscribed
 - How Tower is looked after and managed
 - Tower Environs Project
 - Management Plan
 - Historic Royal Palaces
 - How the Tower is managed and used
 - The Tower in the City
- [HRP – led by Michael Day, CEO and John Barnes, Conservation Director, with contributions by Paul Drury, Consultant] [60 mins]
- 10.30 -14.00 **Site Tour**
Tour of WH Site, Tower environs and strategic views [including light lunch]
- Tower of London WHS
 - Tower Bridge
 - Tower environs
- 14.30 -16.00 **Meeting: Professor Robert Tavernor [Tower of London]**
[The history of urban changes in the area and the changes of its functions and structure; the technical, institutional and academic debate on the issue of conservation of the urban landscape of the city and of the area; the modern significance of the Tower and the perception of its values].
- 16.00 Return to hotel
- 18.00 Escort delegation from hotel to Tower of London [DCMS]
- 18.30 Reception/ Incl. visit to Jewel Tower
- 19.30 Dinner
- 21.30-22.00 Tower of London - Ceremony of the Keys
- 22.00 Return to hotel

Day 3 – Friday 3rd November

09.00	Meet delegation at hotel [DCMS]
09.00-12.00	Westminster and environs – site tour
12.00 -13.00	Light lunch – Westminster Abbey
12.30 -14.00	[M. Bandarin – Private Meeting]
13.15 – 14.00	London Eye
	Travel time
14.30-16.30	Institute of Historical Research
	Meeting: Professor Derek Keene
	<i>[History of urban changes in the area and the changes of its functions and structure; technical, institutional and academic debate on the issue of conservation of the urban landscape of the city and of the area; the modern significance of the Tower and the perception of its values].</i>
16.30	[Departure of Mr Kilian for Stansted Airport Flight -19.30]
16.45-17.45	Wash Up Meeting
19.30	NZ Delegation dinner hosted by NZ High Commission

Abbreviations

GOL	Government office for London
GLA	Greater London Authority
EH	English Heritage
LP	London Plan
LVMF	London View Management Framework
HRP	Historic Royal Palaces

Participants – Day 1 Morning Presentations

Delegation	Mr Tumu te Heuheu, Chair of the World Heritage Committee Mr. John Paki, Special Advisor to the Chair Mr. Alexander Gillespie, Special Advisor to the Chair M. Francesco Bandarin, Director, World Heritage Centre Mr. Ron Van Oers, Urban Conservation and Management (UNESCO) Mr. Jaroslav Kilian, ICOMOS
DCMS	Harry Reeves Peter Marsden
EH	Christopher Young Mike Dunn Sue Cole
GOL	Andrew Melville Roger Chapman Ken Bean
HRP	Paul Drury
GLA	Debbie McMullen Jane Carlsen
City of London	Peter Rees James Bailey/Paul Beckett
Tower Hamlets	Mark Hutton [observers]
Southwark	[observers]

Participants – Day 1 Afternoon

GOL	Andrew Melville }	Attend meeting with Ministers
DCMS	Harry Reeves }	
EH	Sir Neil Cossons Simon Thurley Dr Christopher Young	Meeting delegation

Orientation tour

Delegation x 6
DCMS - Peter Marsden
City of London

Participants – Day 2 Morning

HRP	Keith Cima [Michael Day] tbc John Barnes Paul Drury Trustees: Bridget Cherry Malcolm Reading
DCMS	Peter Marsden
EH	Sue Cole

Site Tour/Lunch

Delegation x 6	
HRP	John Barnes Paul Drury
DCMS	Peter Marsden
EH	Sue Cole
City of London	
Tower Hamlets	Mark Hutton
Southwark	John Eastwood
GOL	Roger Chapman

Participants – Day 3 Morning

Westminster Site Tour

Delegation x 6	
DCMS	Peter Marsden
EH	Christopher young Sue Cole
Lambeth	Michael Copeman
Westminster	Rosemarie Macqueen
Westminster Abbey	David Burden
Parli. Estates	Paul Monahan
GOL	Roger Chapman