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ORGANISATION DES NATIONS UNIES
POUR L'EDUCATION, LA SCIENCE ET LA CULTURE

CONVENTION CONCERNING THE PROTECTION OF THE WORLD
CULTURAL AND NATURAL HERITAGE

CONVENTION CONCERNANT LA PROTECTION DU PATRIMOINE
MONDIAL, CULTUREL ET NATUREL

WORLD HERITAGE COMMITTEE / COMITE DU PATRIMOINE MONDIAL

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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

Tower of London (United Kingdom of Great Britain and Northern Ireland) (C 488) and
Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom of
Great Britain and Northern Ireland) (C 426bis)

Tour de Londres (Royaume-Uni de Grande Bretagne et d'Irlande du Nord) (C 488) et Palais
de Westminster, l'abbaye de Westminster et l'église Sainte-Marguerite (Royaume-Uni de
Grande Bretagne et d'Irlande du Nord) (C 426bis)

5-8 December 2011

5-8 décembre 2011

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

WHC-12/36.COM/7B.Add

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EXECUTIVE SUMMARY

According to Decisions **35 COM 7B.114** and **35 COM 7B.115** of the World Heritage Committee the mission that took place from 5 to 8 December 2011 covered the two World Heritage properties of London: the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church.

The mission met with 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 properties and their context.

At the time of the 2006 reactive monitoring mission to London, concerns were raised with regard to the gaps in national legislation and local regulations relating to the protection of World Heritage sites. Meanwhile, a series of supplementary planning guidance and other publications have been developed by the Mayor, English Heritage and others to guide the conservation and management of urban World Heritage Sites.

The "Tower of London Local Setting Study" that was prepared by consultants for the Tower World Heritage Site Consultative Committee in August 2010 constitutes an important step towards the protection of the property's setting. Any new development situated to the west and north of the property would have to respect the conditions as defined in this study and respect the visual integrity of the property.

Given the dynamic urban context of the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church, the mission reiterated the World Heritage Committee's advice to tightly regulate the construction of tall buildings in the vicinity of the property to maintain their visual integrity and to protect their Outstanding Universal Value.

1. BACKGROUND TO THE MISSION

At the invitation of the Government of the United Kingdom (by letter dated 17 August 2011) and as requested by the World Heritage Committee at its 35th session (Decisions **35 COM 7B.114** and **35 COM 7B.115**), a joint UNESCO-ICOMOS reactive monitoring mission was carried out to assess the overall state of conservation of the World Heritage properties “Tower of London” and “Westminster Palace, Westminster Abbey and Saint Margaret's Church” and the factors affecting its Outstanding Universal Value. The mission took place from 5 to 8 December 2011.

2. MAIN ASPECTS FOR REVIEW AND DISCUSSION AS IDENTIFIED IN THE TERMS OF REFERENCE

According to the Terms of Reference, the reactive monitoring mission

- i. reviewed and discussed with national and local authorities the overall situation of the properties with regard to their state of conservation in their urban context and particularly their visual integrity;
- ii. review progress with addressing the recommendations of the 2006 joint UNESCO/ICOMOS Reactive Monitoring Mission, as set out in the decisions of the World Heritage Committee;
- iii. assessed how incremental changes since the 2006 mission as well as current and proposed major development projects in the immediate and wider setting of the properties impact adversely, or might impact adversely, on their Outstanding Universal Value;
- iv. discussed with national and local authorities how, in the absence of buffer zones, the immediate and wider settings of the properties might be defined as a basis for evaluating the impact of proposed development on Outstanding Universal Value and for putting in place appropriate, specific protection;
- v. reviewed the current mechanisms in place and any under development for protecting the properties and their settings.

3. CONSIDERATIONS BY THE WORLD HERITAGE COMMITTEE, 35TH SESSION (PARIS, 2011) AS ARTICULATED IN DECISIONS 35 COM 7B.114 AND 35 COM 7B.115

Decision - 35COM 7B.114 - Tower of London (United Kingdom) (C 488)

The World Heritage Committee,

1. Having examined Document WHC-11/35.COM/7B,
2. Recalling Decision **33 COM 7B.127** adopted at its 33rd session (Seville, 2009),
3. Acknowledges the completion of the "Tower of London Local Setting Study", however, expresses great concern that this study only addresses individual views and a very narrow local setting, while the overall setting of the Tower in relation to the Outstanding Universal Value has not been defined and provided with protection in line with Decision **33 COM 7B.127** adopted by the Committee at its 33rd session (Seville, 2009);
4. Considers that the incremental developments around the Tower over the past five years have impacted adversely its visual integrity;

5. Requests the State Party to evaluate the impact of proposed changes to the visual setting of the property on its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency;

6. Also requests the State Party to refrain from approving new construction projects in the vicinity of the property without assessing their potential impact on the Outstanding Universal Value of the property;

7. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to discuss with national and local authorities the overall situation of the property with regard to the state of conservation of the site in its urban context and how current and proposed construction projects in its neighbourhood may affect the Outstanding Universal Value of the property, and how appropriate protection for its setting may be put in place for examination by the World Heritage Committee at its 36th session in 2012;

8. Requests furthermore the State Party to submit to the World Heritage Centre, by **1 February 2012**, a report on the state of conservation of the property and on the steps taken to implement all the decisions of the Committee, for examination by the World Heritage Committee at its 36th session in 2012.

Decision - 35COM 7B.115 - Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom) (C 426bis)

The World Heritage Committee,

1. Having examined Document WHC-11/35.COM/7B,

2. Recalling Decision **33 COM 7B.128**, adopted at its 33rd session (Seville, 2009),

3. Notes the intention of the State Party to address issues related to the protection of the visual integrity of the property;

4. Notes with regret that specific measures to protect the immediate and wider settings and have not yet been sufficiently developed;

5. Notes with concern that the State Party acknowledges that major developments currently being considered could have a potential impact on the property;

6. Requests the State Party to evaluate the impact of proposed changes to the visual setting of the property on its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency;

7. Also requests the State Party to refrain from approving any new development project until an adequate protection of the setting of the property is in place;

8. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to review and discuss with national and local authorities the overall situation of the property with regard to the state of conservation of the site in its urban context, how current and proposed construction projects in its neighbourhood may affect the Outstanding Universal Value of the property, and how appropriate protection for its setting may be put in place, for examination by the World Heritage Committee at its 36th session in 2012;

9. Requests furthermore the State Party to submit to the World Heritage Centre, by **1 February 2012**, a report on the state of conservation of the property and in particular on how protection

could be strengthened for its setting and related vistas, for examination by the World Heritage Committee at its 36th session in 2012.

4. INSCRIPTION HISTORY OF LONDON

4.1 Tower of London

The Tower of London was inscribed in 1988 during the 12th session of the World Heritage Committee (Brasilia, Brazil) 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 property has been on the Committee agenda at its sessions in 2003, 2004, 2005, 2006, 2008, 2009 and 2011. In 2006, a joint UNESCO-ICOMOS reactive monitoring mission visited the property to assess the state of conservation and in 2008, 2009 and 2011, the State Party submitted state of conservation reports to the World Heritage Committee. A further state of conservation report is due on 1 February 2012 (Decision **35 COM 7B.118**).

4.2 Westminster Palace

Westminster Abbey and St Margaret's Church were inscribed in 1987 during the 11th session of the World Heritage Committee (Paris, France), 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.

The property has been on the Committee agenda at its sessions in 2008, 2009 and 2011. In 2006, a joint UNESCO-ICOMOS reactive monitoring mission visited the property to assess the state of conservation and in 2008 and 2011, the State Party submitted state of conservation reports to the World Heritage Committee. A further state of conservation report is due on 1 February 2012 (Decision **35 COM 7B.118**).

The World Heritage Committee agreed a small extension to the Westminster property in 2008 to include the road between the Palace of Westminster and the Westminster Abbey.

Statements of Significance for the Tower of London and Westminster were agreed by the World Heritage Committee in 2010 and provide the current baseline for the site's management. Draft Statements of Outstanding Universal Value for both the Tower of London and Westminster are currently with the World Heritage Centre awaiting evaluation.

5. CURRENT PROTECTION MECHANISMS IN PLACE AND ANY UNDER DEVELOPMENT

Planning Policy Statement 5 (PPS 5) sets out Government policies for the conservation of the historic environment, and in particular for those parts of the historic environment that have significance because of their historic, architectural, archaeological or artistic interest, referred to as heritage assets. Guidance to support these policies and to help practitioners implement them is provided in the PPS 5 Practice Guide.

The policies in PPS 5 give greater protection to 'designated' heritage assets, i.e. those heritage assets which possess a level of interest that justifies designation. Such assets include World Heritage Sites, scheduled monuments, listed buildings and conservation areas.

A new National Planning Policy Framework (NPPF) aiming to trim back the extensive and intricate maze of planning policies to a more manageable proportion is in the course of development. This will replace all the present planning policy statements, including PPS 5. It is the Government's intention that the NPPF should maintain existing levels of protection for the historic environment.

Specific policy guidance on the protection of World Heritage Sites is provided in CLG Circular 07/2009. This makes it clear that the Outstanding Universal Value of a World Heritage Site indicates its importance as a key material consideration to be taken into account in determining planning and related applications.

Under the legislation establishing the Greater London Authority (GLA), the Mayor has to produce and keep under review a spatial development strategy (SDS), which is better known as the London Plan. In July 2011 the Mayor published a new replacement London Plan. The Local Authorities' local development documents have to be "in general conformity" with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken.

As such, the protection of cultural heritage, including World Heritage Sites, is primarily through the statutory system of spatial planning operated by local planning authorities and overseen by the Secretary of State for Communities and Local Government. English Heritage and the Department for Culture, Media and Sport (DCMS) play important roles in the protection and conservation of the historic environment.

New guidance documents in national legislation and local regulations relating to the protection of World Heritage Sites have been issued, such as the "Guidance on The Setting of Heritage Assets" (October 2011), or "Conservation Principles – Policies and Guidance for the Sustainable Management of the Historic Environment" (April 2008), both by English Heritage. These documents make more specific the procedure of how to protect aspects of the setting of World Heritage sites, so that their Outstanding Universal Value, integrity, authenticity and significance is not adversely affected by inappropriate change or development.

As mentioned in the document "setting does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset" (The Setting of Heritage Assets, p.4, 2011, English Heritage). Such understanding is a qualitative step towards the protection of visual integrity of heritage assets. A fixed boundary is an exact standardized planning tool for control of an area by describing rules for change. The impact of such document is by definition limited by the boundary. That is why an additional wide area setting tool is necessary in order to assure protection of visual integrity of the property beyond the fixed boundary. Both tools work on different pragmatic principles.

A key document relevant in helping to inform the statutory definition of the setting of World Heritage Sites is the updated London View Management Framework Draft Supplementary

Planning Guidance , which is available for consultation since July 2011. Through the concepts of Strategic Views, Protected Vistas and Protected Silhouettes, this Supplementary Planning Guidance to the 2011 London Plan aims to identify specific locations where geometric protection should be applied to strengthen the protection and conservation of London's World Heritage sites.

For both the Tower of London and Westminster World Heritage Sites management plans were approved and published in 2007. Despite the fact that the plans are not prescriptive, nor legally binding, they are a material consideration in planning decisions affecting these World Heritage Sites or their setting. The management plans were established in cooperation with on-site and off-site partners and went through a process of public consultation. As presented to the mission, both plans provide a solid framework for mid-term decision-making as regards the conservation and enhancement of the World Heritage Sites and the protection of their Outstanding Universal Value.

In conformity with the requirements of the World Heritage Committee, the plans include Statements of Significance in line with the identified Outstanding Universal Value of the sites. Based on an analysis of the current pressures on the specific values of the sites, both plans formulate relevant management objectives and actions; as such, they reflect the issues raised by the World Heritage Committee since the Reactive Monitoring mission of 2006.

6. STATE OF CONSERVATION OF THE WORLD HERITAGE PROPERTIES "TOWER OF LONDON" AND "WESTMINSTER PALACE, WESTMINSTER ABBEY AND SAINT MARGARET'S CHURCH"

The properties of "Tower of London" and "Westminster Palace, Westminster Abbey and Saint Margaret's Church" (hereafter Westminster), inscribed on the World Heritage List in 1988 and 1987 respectively, are in a good state of conservation and, in fact, exemplary if it comes to the identification, protection, conservation, presentation and transmission to future generations of heritage – as was reported in 2006.

In fact, the overall state of conservation of both properties (in terms of the fabric within the boundaries) has improved further, as the Tower of London has been completely restored, including the Outer Curtain Wall (the fortress walls), as well as the removal of several on-site trees that were obscuring the Tower from distant viewpoints (particularly from the other side of the river Thames). As for Westminster, the security measures that had been put in place in 2006 to protect Parliament, which impacted negatively on the aesthetics of the surrounding urban area, are currently being replaced by well-designed "street furniture" of a bomb-proof quality. Further plans are being discussed to divert a part of the traffic away from Parliament Square, in front of Westminster Palace, and turn this into a pedestrian-friendly area. In both cases these restorations and refurbishments will contribute to an improvement of the visual appearance of the properties within their boundaries.

The visual integrity of the Tower of London, however, has been compromised by the "Shard of Glass", Western Europe's highest tower under construction, which will be 310m tall on completion. Although its glass surfaces will probably help, to a degree, to minimize visual infringement, the sheer height of the building will surely attract the gaze –as its design was intended to do– of many a visitor and away from the main attraction of the World Heritage site. However unfortunate, the main issue now is to better regulate the further build-up of the area surrounding the Shard of Glass, on the other side of the Tower Bridge, which has been earmarked for development, possibly with more towers. If any tall buildings are to be planned, these then should not exceed the height by which they would become visible above the on-site historic buildings that are part of the Tower complex (see picture).

With regards to the 20 Fenchurch Street project, subject of criticism during the 2006 mission, permission was granted in 2007. The 38 storey high building located in the financial district is

under construction. The building will have cumulative negative impact to the visual integrity of the Tower of London property.

Already approved redevelopment projects for the “Three Quays” and the “Tower House” buildings will present frontages immediately towards the Tower of London. Situated on the edge of the Liberties they will become important elements of the local setting with impact on visual perception of the relation between the Tower and the City. Detailed design of the planned buildings must respect the perceived scale of the Tower and give attention to selected materials. Tight cooperation between the Borough planning authority, English Heritage and designers is requested to keep the project under the control.

The Definition of the Immediate and Wider Settings of the Properties

The mission spent some considerable amount of time discussing and understanding the absence of buffer zones for both the Tower and Westminster World Heritage Sites, which instead are replaced by the definition of “settings”. In the Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas (ICOMOS, 2005) “the setting of a heritage structure, site or area is defined as the immediate and extended environment that is part of, or contributes to, its significance and distinctive character” (Article 1). Overall, it was explained, the term “buffer zone” carries a negative connotation in the UK. It's perceived as being overly restrictive in that it provides for a blanket protection, which is not fit for complex, dynamic urban environments. Instead, it was put forward, setting is a much broader concept than buffer zone, which is often a hard line on a map, but insufficient to deal with the layered nature of local settings that can also be at quite a distance away from the heritage site; as such, views are an important part of the setting, which are at the moment seldom dealt with in buffer zones.

In order not to bother too much with the semantics, it was commonly agreed that the appropriate policies at a local level, and their implementation, make the protection and conservation of World Heritage sites effective – whether surrounded by a buffer zone or a designated setting. In the case of both the World Heritage sites of the Tower and Westminster the basic standards for World Heritage protection can be met a) through the planning system, and b) through the development of a system of management by way of approved and locally implemented Development Plans and Management Plans, provided that settings are designated.

Further to this, the management of the Tower and its setting is facilitated through the “Tower of London Local Setting Study” prepared in August 2010. The Tower of London Local Setting Study is describing the key issues and proposed objectives within the zone of immediate vicinity of the World Heritage site. The purpose of the document is to set guidelines for the preservation and enhancement of the Outstanding Universal Value of the property by describing the expected quality of the setting and suitable interventions. Such a document with appropriate definitions of the setting should be adopted as statutory within the legal framework of the planning procedures.

The Wider Setting control focuses on the visual impact of more remote activities. The methodology of visual impact assessment in the wide area was presented by the Historic Royal Palaces in 2006. The actually proposed London View Management Framework is a certain “negotiated” form of the original proposal.

The mission recommends preparing a similar setting study for the World Heritage Site of Westminster which defines the immediate and wider setting. These then, taken together with their approved Management Plans (both in 2007) and an approved London View Management Framework, could provide adequate protection similar to what could be achieved through designated buffer zones and necessary supplementary wider area visual impact control tools.

7. PROGRESS IN THE IMPLEMENTATION OF THE RECOMMENDATIONS OF THE JOINT WORLD HERITAGE CENTRE/ICOMOS MISSION OF 2006

The 2006 Reactive Monitoring mission noted the following three topics of major concern:

- a) A tall building development strategy, actively promoted by the Mayor of London and the Greater London Authority (GLA), as a result of which new urban development carried out at the time had considerable impact on the visual integrity of both the Tower of London and Westminster World Heritage sites.

With Boris Johnson as the new Mayor (replacing Ken Livingstone), a shift in the development strategies of Greater London is being promoted in the new London Plan, the spatial development strategy for Greater London published in July 2011. Although some of the inner city areas surrounding the World Heritage sites of the Tower and Westminster are still earmarked as “opportunity areas” or “areas for intensification” (p. 60) and “regeneration” (p. 62), more emphasis is placed on identifying appropriate and inappropriate locations for high-rise based on local character, where “development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings” (Policy 7.4, p. 214). Furthermore, “development should not cause adverse impact on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer’s ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plans” (Policy 7.10, p. 222). GLA representatives stressed that the tall buildings currently under construction in the inner city, including the Shard of Glass, were conceived and approved under the previous city administration: “the current Mayor is taking a stronger direction in these matters”.

- b) Gaps in national legislation and local regulations relating to the protection of World Heritage sites, as there were inadequate guidelines and no impact assessment tools available for new urban development in Greater London.

Several regulations and guidelines have been approved and published, some of them of exemplary quality, to address this concern and to close the gaps as indicated by the 2006 mission. In July 2007 English Heritage and CABE (Commission for Architecture and the Built Environment) published “Guidance on Tall Buildings”. “Conservation Principles – Policies and Guidance” was published by English Heritage in April 2008. In August 2010 the “Tower of London Local Setting Study” was prepared by consultants on behalf of the Tower of London World Heritage Site Consultative Committee, which includes guidelines for management of the local setting of the Tower of London. In May 2011 English Heritage published “Seeing the History in the View”, a method for assessing heritage significance within views. The Mayor’s London View Management Framework Draft Supplementary Planning Guidance to the London Plan, published London in July 2011 for public consultation, provides the principal document in which to assess development with strategic views. Last but not least, the Draft Supplementary Planning Guidance “London World Heritage Sites – Guidance on Settings” was published by the Mayor of London in October 2011 for public consultation, supplemented by guidance on “The Settings of Heritage Assets” published by English Heritage in October 2011 also. Taken together these probably comprise some of the most comprehensive guidance on the conservation and management of urban World Heritage available today.

- c) The mission concluded that “in order for these issues to be properly addressed, there is a need to finalize 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.”

In 2007 the Management Plans for both the Tower of London and Westminster were approved and published, while the implementation of the provisions of these World Heritage Site Management Plans has been included in the new London Plan’s Policy on World Heritage

Sites (7.10). In conclusion, all major concerns related to legislation and regulation raised during the 2006 joint ICOMOS-WHC Reactive Monitoring mission have been addressed.

8. INCREMENTAL CHANGES SINCE THE 2006 MISSION, AND CURRENT AND PROPOSED DEVELOPMENT PROJECTS

In the direct vicinity of the Tower of London, two redevelopment projects were discussed, one underway and the other proposed. The proposed 8-storey Tower House is situated to the north of the Tower World Heritage Site, on the other side of the main road of Byward Street/Tower Hill (A100), at the entrance of the Tower Hill Underground station at Trinity Gardens. As this northern edge is highly visible from the Tower, particularly from the outer curtain wall, the proposed Tower House redevelopment project would offer an opportunity to re-qualify the urban facade, which currently lacks a coherent character. The mass and scale of this new building should be kept within the perceived scale of the Tower World Heritage Site so that the monument can maintain its prominent place within the setting. This line of reasoning has also been put forward in the "Tower of London Local Setting Study" (p. 21).

The other redevelopment project in the Tower's direct vicinity concerns Three Quays Wharf, a warehouse-style construction which was started recently. Given its close proximity to the Tower's entrance at the Middle Tower –it forms part of the western urban facade of the Tower World Heritage Site right on the river Thames– the bulk and height of this redevelopment will be important as regards to the perceived scale of the Tower in its setting. Unfortunately, the scheme was already approved under the previous city administration, which is a missed opportunity to re-align the western urban edge of the Tower with the scale of the monument.

The revised development project of Potter's Field, adjacent to City Hall on the banks of the river Thames, has been re-evaluated resulting in approval for the scheme in April 2011. At the same time the Borough of Southwark adopted their core strategy in April 2011, which includes an emphasis on heritage assets and revises their approach to tall buildings on the area. The new proposal has less bulky buildings than in the earlier project and maintains only one tall structure, an Italian-style "campanile", which will be the only slim structure hardly visible from within the Tower World Heritage Site – the mission considers this a much better proposal than the earlier project.

The development of the London Bridge area around the Shard of Glass has been discussed.

In the case of the Doon Street for which planning permission was granted in 2008, a joint legal protest by Westminster Council and English Heritage against the adverse impact on London's historic skyline was rejected by the Secretary of State and the decision confirmed by the High Court in 2010. Reservations were expressed mainly for its impact on the setting of the National Theatre, the Royal Festival Hall and for its harm on views across the Thames from Somerset House and St James Park. The building is situated in the Mayor's adopted Waterloo Opportunity area. In line with the planning policy, other development projects in the area are under preparation. The visual control of the impact of the emerging cluster on the urban landscape and particularly on the wider setting of the Westminster World Heritage property is a future challenge to the London View Management Framework.

An already contentious project in the backdrop of Westminster concerns the redevelopment of Elizabeth House, 39 York Road. Due to its close proximity to Waterloo Station, this area has been earmarked in the London Plan for higher density development. This includes the possibility of a tall building, which depending on its absolute height, could become visible in the backdrop of London's most famous view: that of Westminster Palace and its clock tower, Big Ben, which "has come to symbolize the United Kingdom across the world" (The London View Management Framework Draft Supplementary Planning Guidance, p. 227). This redevelopment project falls under the jurisdiction of the Borough of Lambeth, but the key concern in terms of World Heritage conservation lies with the Borough of Westminster, on the other side of the river Thames – indeed, a direct result of the UK planning system. As will be

further outlined below, London's boroughs and neighbourhoods have decentralised power to pursue their own local development agenda (Lambeth adopted its core strategy in January 2011), through guidance and interpretation of strategic policies as put forward in the London Plan, which constitutes "the genius of London over the last two thousand years", in the words of Mayor Johnson (The London Plan, p. 7).

The London View Management Framework (LVMF) through London Plan Policy 7.11 – table 7.1 designates 27 Strategic Views. This includes a number of Protected Vistas and Silhouettes for some of the designated views in central London. The current Draft Supplementary Planning Guidance provides details on the management of all of the designated views. This includes details for the new Townscape View from Parliament Square (Assessment Point 27A, p. 229). If approved (it's currently out for consultation), it would facilitate a better grip on developments that would appear in the one view that includes part of the backdrop of Westminster. (The mission noted the criticism of the Borough of Westminster on the LVMF in general, as being "not simple, not clear, and too much open to interpretation, where more prescription would be needed", and the proposed Protected View in particular, which they considered should have been proposed as a view cone instead of a narrow linear view (as it would have automatically put a limit on the height of possible developments in Lambeth). The boroughs of Lambeth and Westminster are communicating to work towards a compromise solution that will satisfy the development needs of Lambeth, while respecting the integrity of the World Heritage Site of Westminster. The redevelopment project of Elizabeth House will be a litmus test as regards the robustness of the national planning system vis-à-vis the protection and conservation of London's World Heritage sites.

To sum up -For some projects such as "Potter's Fields" or "Royal Mint Street" less strident schemes have been achieved but since 2006 visible damages on the visual integrity of the Tower of London Tower have occurred as it was assumed would be the case for the "Shard of Glass". Further development in the area is expected with possible intrusive impact on the visual integrity of the Tower.

Two projects in close vicinity to Tower on the limits of Liberties have been granted planning permission ("Three Quays" and "Tower House"). Their construction works have started or are just under preparation. The proposed buildings are located in very sensitive locations. Their proportions will have decisive impact on the redefinition of the public realm by creating a screen between the Tower and the City. Control of the process is in hands of planning authorities and English Heritage.

Important changes are being achieved in the field of planning. In terms of The Draft London View Management Framework (LVMF) and the London World Heritage sites Guidance on Settings Draft Supplementary Planning Guidance (SPG), both of which are out for consultation.

The SPG might become a solid basis for future statutory control of developments and assessment of their impact on the visual integrity of the World Heritage Sites and their settings.

The LVMF document could definitely provide a robust basis for the protection of identified views, vistas and silhouettes. All of the designated views have been identified in the replacement London Plan (2011), and all are subject to qualitative visual assessment. However, only some of the designated views are geometrically defined and therefore identified as Protected Vistas. The question is open as to how the impact of developments will be assessed using the qualitative visual assessment, especially where the view has not been geometrically defined. The effectiveness of this process would depend upon the condition that the assessors are independent in their judgments.

For London's World Heritage sites these tools come unfortunately after the problem of visual degradation of the wider setting emerged and irreparable damage to the visual integrity of both sites has happened.

9. CONCLUSION AND RECOMMENDATIONS

The UK's national policies focus on achieving sustainable development, in which heritage assets are considered to be catalysts for the regeneration of areas. In other words, the conservation of heritage, including World Heritage, is regarded as a contribution to a process of sustainable development, not an end in itself. This explains why flexibility and the interpretation of guidance, as opposed to straightforward prescription of protection and conservation measures, is held in such high esteem in the English context. However, flexibility and the interpretation of guidelines require rigour and transparency in how policies are being applied and implemented, with a series of checks and balances.

In the mission's view the system of spatial planning with national policies, prioritized for the capital city by the Mayor in the London Plan, which then forms the basis for the elaboration of local development plans by the London Boroughs that manage urban areas with their assets – some of cultural-historic significance and designated, others not–, facilitated through a broad set of planning and management guidance on properties, their setting and views, among others, could (depending on the outcome of on-going consultations and a clearer definition of setting) provide for a comprehensive and effective system of management, as required under the 1972 *World Heritage Convention*.

Within the current system a culture of consultation and cooperation operates, where input and feedback are requested from English Heritage as well as local stakeholder groups. Upstream discussions with developers and pre-application consultation rounds with local stakeholders, in the case of the Borough of Tower Hamlets for instance, shape the management context, where demands for a restriction or removal of Permitted Development Rights (PDRs) can be brought forward in case these should impact negatively on designated heritage assets – a democratic situation quite ideal when compared with many other regions in the world. In fact, on paper, it constitutes the essence of the new *Recommendation on the Historic Urban Landscape*, which was adopted at the 36th General Conference of UNESCO on 10 November 2011. However, the proof of its effectiveness is in how it works across all of the stakeholders involved.

In 2006 there were already existing tools allowing the stopping of controversial projects affecting the World Heritage Sites, but there was simply not the will to do so. The Secretary of State rejected claims of English Heritage in favor of development. The Mayor of London has seen priority in growth. Now we can see that there is a considerable change of attitude and the position of English Heritage in planning process is strengthened by proposed new policies and guidance.

As regards the overall state of conservation of the properties and their visual integrity, the mission recommends that the further build-up of the area surrounding the Shard of Glass, on the other side of the London Bridge, be tightly regulated to avoid the further construction of tall buildings that could exceed the height by which they would become visible above the on-site historic buildings of the Tower complex. The development of more tall buildings that would become visible would destroy the visual integrity and seriously damage the Tower's Outstanding Universal Value, possibly beyond repair.

As regards the recommendations of the 2006 Reactive Monitoring mission, the identified gaps in national legislation and local regulations relating to the protection of World Heritage sites are being addressed through a series of supplementary planning guidance and other publications, which, if approved and suitably translated into defined actions, could comprise a comprehensive set of guidance on the conservation and management of urban World Heritage Sites available today. The mission would like to commend English Heritage in particular for the work undertaken so far.

As regards the incremental changes since 2006, and current and proposed development projects, several of these came about through the approval of the former Mayor of London and

some through the approval of the former Secretary of State. At best these now provide object lessons in planning and management of the historic environment. However, the redevelopment of Elizabeth House, adjacent to Waterloo Station, will be a litmus test for the sitting Mayor and his administration to demonstrate the robustness of the planning system and their sensitivity towards protecting London's prime heritage assets. If a planning proposal for a tall building is put forward that threatens to destroy the visual integrity of the World Heritage Site of Westminster, which will be given planning consent and a permit in spite of the negative impact, the inevitable conclusions will have to be drawn concerning the effectiveness of the management system put in place.

As regards the definition of the immediate and wider settings of the properties, the management of the Tower and its setting is currently being facilitated through the "Tower of London Local Setting Study" prepared in August 2010.

Any new development situated to the west and north of the Tower World Heritage site particularly the granted redevelopment projects of the "Three Quays" and the "Tower House" would also have to respect the conditions as defined in the Tower of London Local Setting Study and respect the visual integrity of the property. The definition of local setting is for the moment the most sensitive. There is a need for a statutory document describing the immediate and wider setting and conditions for further redevelopment. This could be an appraisal within the limits considered by the local setting study or similar document (conservation area, local setting area, buffer zone ...).

In 2006, the Historic Royal Palaces presented a complex visual impact assessment study. Now as mentioned above, part of the wider setting visual assessment was incorporated in the London View Management Framework.

The mission recommends that a similar, but extended setting study for the World Heritage site of Westminster is prepared. If defined settings are adopted for the two properties, together with the approved Management Plan, an approved London View Management Framework, and an approved Settings Guidance document linked to defined settings, these could provide adequate protection similar to what could be achieved through designated buffer zones and other necessary complementary planning tools.

Until proven otherwise, as stated above in the case of the redevelopment of Elizabeth House for instance, the current protection mechanisms in place augmented by the instruments currently under consultation seem to provide for a comprehensive and effective system of management, as required under the 1972 *World Heritage Convention*.

ANNEXES

ANNEX 1. Illustration

ANNEX 2. Mission composition

ANNEX 3. Mission programme

ANNEX 4. Reference documents



The on-site historic buildings of the Tower complex, with the Shard in the backdrop. Any new tall structure should not appear above the historic buildings as seen from this viewpoint within the Tower precinct.

ANNEX 2. Mission composition

Dr Ron van Oers, Programme Specialist, Special Projects Unit, UNESCO World Heritage Centre

Mr Jaroslav Kilian, Ing. arch., ICOMOS Expert

ANNEX 3. Mission programme

Day 1 – Monday, 5 December: Context

Time	Activity	Lead	Attending
00.00	UNESCO/ICOMOS Mission arrives	-	Jaroslav Kilian, ICOMOS Ron von Oers, UNESCO
00.00	Transfer to hotel	-	-
11:30	Escort delegation from hotel to Greater London Authority	Paul Blaker	
12.15	Arrive Greater London Authority	Paul Blaker/ Rachael Rooney	-
12.20	Sandwich lunch Committee Room 1	-	Christopher Young, EH, Paul Blaker, DCMS Sue Davies, UKNC Steve Quartermain, DCLG Jane Carlsen, GLA, Rachel Rooney, GLA, Justin Carr, GLA, Rosemarie MacQueen, Westminster Doug Black, Lambeth Mark Hutton, Tower Hamlets Simon Bevan, Southwark Peter Wynne Rees, City of London, Paul Beckett, City of London, Lewis Claridge, City of London Barry Sellers, Wandsworth Council Tracy Simmons, HRP Anna McPherson, Adviser to HRP Graham Saunders, EH John Burton, Westminster Abbey Chris Vyse, Westminster Abbey
12:50	Visit to Living Room to look at skyline	Rachael Rooney, Christopher Young, Paul Blaker, Jane Carlsen, Mark Hutton, Paul Beckett, Simon Bevan, Anna MacPherson	
13.15	Welcome and Introduction	Paul Blaker	
13.20	Welcome from UK National Commission	Sue Davies, Deputy Chair, UKNC	
13.25	Aim of the Mission and Role of the Delegation	Leader of Delegation	
13.30	Presentation: Framework of National Planning	Steve Quartermain, DCLG	

	Policies		
13.50	Questions	Paul Blaker (chair)	
14.00	Presentation: Protecting UK World Heritage Sites	Christopher Young	
14.20	Questions	Paul Blaker (chair)	
14:30	Meeting with Boris Johnson, Mayor of London	Jane Carlsen	Rachael Rooney, Justin Carr, Paul Blaker
15.15	Presentation: London Planning Policies	Jane Carlsen/Rachael Rooney	Christopher Young, EH, Paul Blaker, DCMS Sue Davies, UKNC Steve Quartermain, DCLG Jane Carlsen, GLA, Rachel Rooney, GLA, Justin Carr, GLA Rosemarie MacQueen, Westminster Doug Black, Lambeth Mark Hutton, Tower Hamlets Simon Bevan, Southwark, Peter Wynne Rees, City of London, Paul Beckett, City of London, Lewis Claridge, City of London Barry Sellers, Wandsworth Council Tracy Simmons, HRP Anna McPherson, Adviser to HRP Graham Saunders, EH
15.45	Questions	Paul Blaker	
15.55	Coffee	-	
16.10	Presentations: Local Planning Policies		
(16.10)	Southwark	Simon Bevan	
(16.20)	City of London	Peter Wynne Rees	
(16.30)	Tower Hamlets	Mark Hutton	
(16.40)	Lambeth	Doug Black	
(16.50)	Westminster	Rosemarie MacQueen	
(17.00)	Wandsworth	Barry Sellers	
17.10	Questions	Paul Blaker	
17.30	Close	-	-
17.30	Escort Delegation to hotel	Paul Blaker	-

Day 2 – Tuesday, 6 December – Westminster

Time	Activity	Lead	Attending
8.30	Escort delegation from hotel to Portcullis House	Paul Blaker	-
8.50	Arrive Portcullis House	Paul Blaker/ Adam Watrobski	-
9.00	Presentation: Introduction to Westminster World Heritage Site Room O – Adam Watrobski will be at Security to direct you	Christopher Young	Paul Blaker, DCMS; Rosemarie MacQueen, Westminster Council; Doug Black, Lambeth Barry Sellers, Wandsworth Adam Watrobski, Palace of Westminster; Tessa Blundy, Palace of Westminster Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey Mel Barlex, Palace of Westminster
9.45	Tour of Parliament Square viewpoints	Paul Blaker	Christopher Young, EH; Rosemarie MacQueen, Westminster Council; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey
10.45	Walk to DCMS	Paul Blaker	Christopher Young, EH
11.15	Meeting with John Penrose, Minister for Heritage	Paul Blaker	Christopher Young, EH

11.50	Lunch at DCMS		Christopher Young, EH; Rosemarie MacQueen, Westminster; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey Plus: Clare Pillman, Director, and Helen Williams, Deputy Director, DCMS -----
12.20	Leave DCMS via Hungerford Bridge	Paul Blaker	Christopher Young, EH; Rosemarie MacQueen, Westminster; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey
13.10	Arrive London Eye		Christopher Young, EH; Rosemarie MacQueen, Westminster; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey
13.30	Board London Eye		Christopher Young, EH; Rosemarie MacQueen, Westminster; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA, Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey Lewis Claridge, City of London Michael Tsoukaris, Southwark Mark Hutton, Tower Hamlets
14.00	Walk to Westminster Abbey via Lambeth Bridge and Albert Embankment	Paul Blaker	Christopher Young, EH; Rosemarie MacQueen, Westminster Council; Doug Black, Lambeth Barry Sellers, Wandsworth Jane Carlsen, GLA, Rachael Rooney, GLA,

			Justin Carr, GLA, Tim Jones, EH Nick Collins, EH Chris Vyse, Westminster Abbey
15.15	Tour of Westminster Abbey	Sir Stephen Lamport, Receiver General	Paul Blaker Christopher Young Chris Vyse, Westminster Abbey
16.00	Walk to Portcullis House		Paul Blaker Christopher Young
16.15	Coffee		Paul Blaker, Christopher Young, Adam Watrobski, Tessa Blundy
16.45	Tour of Palace of Westminster, view from the Terrace	Adam Watrobski	Adam Watrobski Tessa Blundy Paul Blaker Christopher Young
17.45	Escort delegation back to hotel	Paul Blaker	

Day 3 – Wednesday, 7 December – Tower of London

Time	Activity	Lead	Attending
9.15	Escort Delegation from hotel to Westminster Pier	Paul Blaker	
10.00	Boat Trip from Westminster to Tower of London	Christopher Young	Paul Blaker, DCMS Christopher Young, EH Graham Saunders, EH
10.40	Arrive Tower of London Pier, security check-in Everyone to arrive at Main Entrance to Tower – report to pass office (next to West gate shop) and will be met by Tracy Simmons	Tracy Simmons to meet delegation at Security	

11.00	Welcome and Introduction	Richard Harrold, Resident Governor of the Tower of London	Paul Blaker, DCMS; Christopher Young, EH; John Barnes, HRP Tracy Simmons, HRP; Michael Tsoukaris, Southwark;
11.05	Presentation: The Tower of London in its setting Questions	John Barnes/Paul Drury	Mark Hutton, Tower Hamlets; Jane Carlsen, GLA, Rachael Rooney, GLA; Justin Carr, GLA; Anna McPherson, Adviser to HRP; Paul Drury, Adviser to HRP;
11:50	Tour of Tower of London	John Barnes/Paul Drury	Peter Wynne Rees, City of London; Paul Beckett, City of London; Gwyn Richards, City of London; Lewis Claridge, City of London
1:00	Sandwich lunch		Mike Dunn, EH Nick Collins, EH
13.30	Tour of Tower environs and strategic views, Tower Bridge	Paul Blaker	Christopher Young, EH; Michael Tsoukaris, Southwark; Mark Hutton, Tower Hamlets; Jane Carlsen, GLA; Rachael Rooney, GLA; Justin Carr, GLA; Peter Wynne Rees, City of London; Paul Beckett, City of London; Gwyn Richards, City of London; Lewis Claridge, City of London John Barnes, HRP; Tracy Simmons, HRP; Paul Drury, Adviser to HRP; Anna McPherson, Adviser to HRP Mike Dunn, EH Mike Collins, EH
15:00	Free time for reflection		

Day 4 – Thursday, 8 December

Time	Activity	Lead	Attending
9.00	Escort delegation from hotel to English Heritage 1 Waterhouse Square, 138-142 Holborn	Paul Blaker	
10.00	Meeting with Chief Executive of English Heritage	Simon Thurley	Paul Blaker, DCMS Christopher Young, EH
11.00	Coffee		Paul Blaker Christopher Young, Sue Davies, UKNC Andrew Barry-Purssell, Jane Carlsen, Rachael Rooney, Tracey Simmons, Anna McPherson, Adam Watrobski, John Burton, Doug Black, Tessa Blundy, Rosemarie MacQueen, Michael Tsoukaris, Mark Hutton, Peter Wynne Rees, Lewis Claridge, Steve Quartermain, DCLG, Barry Sellers Graham Saunders, EH John Burton, Westminster Abbey, Chris Vyse, Westminster Abbey
11.15	Wash-up meeting At English Heritage, 1 Waterhouse Square, 138-142 Holborn	Leader of Delegation	
13:00	Sandwich lunch		
14.00	Close		

Participants

John Barnes, Conservation and Learning Director, Historic Royal Palaces
Andrew Barry-Purssell, Senior Manager – London Plan, Greater London Authority
Paul Beckett, Policy and Performance Director, City of London
Simon Bevan, Interim Head of Planning and Transport, Southwark Borough Council
Paul Blaker, Head of World Heritage, Department for Culture, Media and Sport
Tessa Blundy, Assistant Conservation Architect, Palace of Westminster
John Burton, Survey of the Fabric of Westminster Abbey
Jane Carlsen, Principal Planner, Greater London Authority
Justin Carr, Strategic Planning Manager, Greater London Authority
Lewis Claridge, Planning Officer, City of London
Nick Collins, Team Leader, East and South London, English Heritage
Sue Davies, Deputy Chair, UK National Commission for UNESCO
Paul Drury, Partner, Drury McPherson Partnership, Advisers to Historic Royal Palaces
Michael Dunn, Team Leader, City of London and North London, English Heritage
Richard Harrold, Tower Group Director, Historic Royal Palaces
Timothy Jones, Team Leader, City of Westminster and West London, English Heritage
Sir Stephen Lamport, Receiver General, Westminster Abbey
Anna McPherson, Partner, Drury McPherson Partnership, Heritage Advisers to Historic Royal Palaces
Steve Quartermain, Chief Planner, Department for Communities and Local Government
Gwyn Richards, Senior Planning Officer (Urban Design), City of London
Rachael Rooney, Senior Strategic Planner, Greater London Authority
Graham Saunders, Senior Planner, English Heritage
Barry Sellers, Senior Planner, Wandsworth Borough Council
Tracy Simmons, Conservation Building Surveyor, Historic Royal Palaces
Michael Tsoukaris, Head of Design and Conservation, Southwark Borough Council
Chris Vyse, Legal Secretary to the Dean and Chapter of Westminster Abbey
Adam Watrobski, Conservation Architect, Palace of Westminster
Peter Wynne Rees, City Planning Officer, City of London
Christopher Young, Head of International Advice, English Heritage

WALKING TOUR – PARLIAMENT SQUARE (morning 6th Dec)

TIME	ACTIVITY
9:40	Leave Portcullis House
9:45	Stop A – Foot of Westminster Bridge
9:55	Stop B – Corner of Parliament Street and Parliament Square - Note Parliament, church and Abbey together (<i>EH talk about reasons for inscription</i>) - Note clock tower - Note the LVMF view towards Wandsworth – explain Protected Silhouette (GLA) - Note the amount of traffic, street furniture, experience of WHS (DCMS)
10:05	Stop C – Corner of Birdcage Walk and Parliament Square - Note silhouette of Palace of Westminster - Note security barriers integrated (Westminster) - Note LVMF point – kinetic assessment (GLA) - Note gap between clock tower and Portcullis House - Note derelict office building on junction of A3036 and A23 (<i>Lambeth talk about regeneration here</i>)
10:15	Stop D – Outside Supreme Court - LVMF view (GLA) - Note gap between clock tower and Portcullis House (<i>Lambeth talk about previous Elizabeth House application</i>)
10:30	Stop E – Corner of St Margaret Street and Parliament Square - Note security barriers (<i>Westminster talk about future improvements</i>) - Widening pavements (Westminster)
10:45	Walk up Whitehall back to DCMS
11:05	Arrive DCMS

WALKING TOUR – HUNGERFORD BRIDGE, EMBANKMENT AND LAMBETH BRIDGE
(afternoon 6th December)

TIME	ACTIVITY
12:20	Leave DCMS
12:40	Stop A – Hungerford Bridge - Note that Hungerford Bridge footway is new (<i>DCMS</i>). - Note protected silhouette (<i>GLA</i>) - Note Vauxhall Cluster and how the river turns - Note Nine Elms Opportunity Area and where new US Embassy will be (<i>Wandsworth</i>) - Battersea Power Station (<i>Wandsworth</i>) - Note Elizabeth House and Waterloo Opportunity Area (<i>Lambeth</i>)
12:50	Walk to London Eye
13:00	Stop B – Albert Embankment, just after London Eye - Note view to Houses of Parliament and where Victoria Transport Interchange would have interrupted it (<i>Westminster</i>)
13:10	London Eye Trip
14:00	Walk to Albert Embankment
14:10	Stop C – Albert Embankment, opp. Houses of Parliament - Note view of Parliament (<i>Palace of Westminster</i>)
14:20	Walk to Lambeth Bridge
14:40	Stop D – Lambeth Bridge - Note Waterloo opportunity area (<i>Lambeth</i>) - Note low buildings along the river
14:50	Walk to Victoria Gardens
15:00	Stop E – Victoria Gardens - Note setting of Palace from the Gardens
15:05	Walk to Westminster Abbey

WALKING TOUR – TOWER OF LONDON ENVIRONS (afternoon 7th December)

TIME	ACTIVITY
1:30	Leave Tower of London - Outside Tower, note relationship with river, access - Riverside Walk, Jetty
1:35	Stop A – Just above the Tower ticket kiosks - Note height of buildings on the south bank of the river - Note Potters Field (<i>Southwark</i>) - Note routes around the tower buffered from the traffic and noise – (<i>HRP</i>) - Road – main East West link– note Congestion Charge has reduced traffic flow (<i>GLA</i>)
1:45	Depart Stop A
1:50	Stop B – Northern exit of Trinity Gardens - Brief stop here
	Stop C – Tower Hill Station - Note underpass
1:55	Stop D - Note improvements in the public realm around Tower Gateway. - Note how most people approach from the Tube exit
2:05	Stop E – Outside the Royal Mint - Note how the cluster of tall buildings in the city don't impose on the Tower. - Note the Shard.
2:15	Depart Stop E
2:25	Stop F – Middle of Tower Bridge - Note LVMF View point – (<i>GLA</i>) - Note the case studies (<i>City talk about International House and Sugar Quay</i>)
2:35	Depart Stop F
2:40	Stop G – On South Bank opposite the Tower - LVMF points (<i>GLA</i>) - Note protected silhouette and protected vista

	- Note the trees (<i>HRP</i>) - Note that improved access along river and views of Tower (<i>GLA</i>)
2:50	Depart Stop G
	Stop H - top of Scoop - Note the perception and separation of Shard from Tower
3:00	Stop I – Covered viewpoint just before London Bridge City Pier
3:10	End of Tour.

ANNEX 4. Reference Documents

English Heritage. (2011). *Seeing the History in the View*.

English heritage. (2007). *Guidance on tall buildings*.

English Heritage. (2011). *Tower of London World Heritage Site (Map)*.

English Heritage. (2011). *Westminster World Heritage Site (Map)*.

English Heritage. (2008). *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.

Historic Royal Palaces for the World heritage Site Consultative Committee. (2011). *Tower of London World heritage site: Proposed Attributes of Outstanding Universal Value, Consultation Draft*.

John L. Gray, Inspector appointed by the first Secretary of State. (2003) *London Borough of Southwark, Application by Teighmore Limited*.

London Borough of Tower Hamlets. (2011). *Managing Development: Developing Plan Document*.

Land Use Consultants and Colin Buchanan on Behalf of the Tower of London World Heritage Site Consultative Committee (2010). *Tower of London Local Setting Study*.

John Barnes. (2011). *The Tower of London World Heritage Site (Presentation)*.

Mayor of London. (2011). *Draft Supplementary Planning Guidance: London World Heritage Sites – Guidance on Settings*.

Mayor of London (2011). *The London Plan: Spatial Development Strategy for Greater London*

Mayor of London. (2011). *Draft Supplementary Planning Guidance: London View management framework*

Office of the deputy prime Minister (2003) *Town and Country Planning Act 1990 – Section 77, Lanf Adjoining London Bridge Station, at St. Thomas Street/Joiner Street, London Se1. Application No. 0100476*

Rosemarie Mac Queen. (2011). *World heritage in a Living City (Presentation)*.

The London Plan (presentation). (2011)

World Heritage Center. (2011). *WHC-ICOMOS Joint reactive Monitoring Mission to the World heritage properties: "Tower of London" 'Westminster palace, Westminster Abbey and Saint Margaret's Church'*