



Department for
Digital, Culture
Media & Sport

100 Parliament Street
London SW1A 2BQ
T: 020 7211 6000

Dear Dr Rössler,

**PALACE OF WESTMINSTER AND WESTMINSTER ABBEY INCLUDING SAINT MARGARET'S
CHURCH (UNITED KINGDOM) (C426 bis)**

In accordance with Decision 42 COM 7B.94, I am submitting the State of Conservation Report for the Palace of Westminster and Westminster Abbey World Heritage Site. We have used the format stipulated as far as is possible.

I can confirm that I am content for the report to be posted on the UNESCO World Heritage Centre website.

Kind regards,

Enid Williams
Senior Heritage Policy Advisor

**STATE OF CONSERVATION REPORT
BY THE STATE PARTY
(in compliance with Paragraph 169
of the *Operational Guidelines*)**

1. Executive Summary of the Report

In accordance with Decision **43 COM 7B.94**, the United Kingdom State Party has produced this State of Conservation Report (SOCR) for the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Site (Westminster World Heritage Site).

This SOCR updates the Committee following the previous report submitted to the World Heritage Centre in **January 2019**.

Specifically, in response to the Committee's decision and the report of the 2017 ICOMOS/ICCROM advisory mission, this report provides updated information on the conservation of the Westminster World Heritage Site, policy at local and national levels, the World Heritage Site Management Plan and progress on the recommendations of the 2017 reactive monitoring mission.

The report is structured according to the format provided by the World Heritage Centre. The clauses of the World Heritage Committee decisions and/or mission recommendations are given in italic and indented. Where possible, responses to mission recommendations are combined with the response to the Committee decision. The response of the State Party is not indented and does not use italics.

2. Response from the State Party to the World Heritage Committee's Decision

Decision 43 COM 7B.94

1. *Having examined Document WHC/19/43.COM/7B.Add,*
2. *Recalling Decision 38 COM 7B.36, 39 COM 7B.87 and 41 COM 7B.55, adopted at its 38th (Doha, 2014), 39th (Bonn, 2015), 41st (Krakow, 2017) sessions respectively,*
3. *Notes the effort of the State Party to update its planning policies, but notes with concern the continuing disconnect between policies and results regarding a heritage-led planning approach for World Heritage properties;*

As set out in previous State of Conservation reports, and taking note of the recommendations of the 2017 mission, the State Party continues to work with partners to develop and update the existing planning frameworks at national, regional and local levels to stress the importance of Outstanding Universal Value. Additionally, we are continuously looking to ensure that OUV is both clearly articulated in policy and OUV is given the maximum weight possible in decision making.

The 2019 State of Conservation report included an overview of the changes to national planning policy guidance which were adopted to help protect OUV. While accepting that in the past there may have been a “disconnect between policies and results”, the State Party believes that policy measures in place give appropriate weight to OUV. The State Party does not, therefore, accept that there is a “continuing disconnect” between policy and practice, however we will continue to look for opportunities to improve the understanding and protection of World Heritage, such as through digital means.

4. *Requests the State Party to provide as soon as possible a clear timeframe for the review of the London Plan, and to submit to the World Heritage Centre the final draft of the London Plan and the relevant parts of the borough local plans, for review by the Advisory Bodies prior to their adoption;*

New London Plan

Since the previous State of Conservation Report, the Greater London Authority (GLA) has made significant progress towards the adoption of the **New London Plan**. The Mayor submitted his new London Plan to the Secretary of State (SoS) for Housing, Communities and Local Government on 24 December, 2019. The SoS directed the Mayor to make certain policy changes on 13 March, 2020, though these did not include policies related to culture or heritage.

The draft Plan sets out a range of overarching policies for London with a significantly strengthened approach to protection of the Outstanding Universal Value (OUV) of London’s four World Heritage Sites (WHS). Given the advanced stage of the plan the policies carry weight and are in use in planning decisions now. The Planning Inspectorate, who examined the New London Plan, found that policy HC2 on World Heritage Sites actively responds to the findings of the joint ICOMOS/ICCROM Reactive Monitoring Mission (2017), and consider the policy to be sound. The New London Plan has yet to be adopted, however, there are no anticipated change to its heritage policies.

The London-wide plan also requires that each of the 32 borough councils put in place more detailed policies that reflect the London Plan requirements. Individual boroughs have started this process and are undertaking reviews of their own local plans as set out below.

Westminster City Council

The City of Westminster, the local authority area where the World Heritage site is located, has undertaken several rounds of consultation on its revised City Plan. The Westminster City Plan, 2019-2040, was submitted to the Secretary of State in November 2019 with an Examination in Public of the Plan held in September/October 2020. The UNESCO Mission recommendations formed part of the background information provided to the Inspector reviewing the plan. There will be consultation on main modifications to the plan in late 2020, and formal adoption of policy is anticipated in early 2021.

The Plan includes specific policy guidance on Westminster’s World Heritage Site. This guidance was significantly strengthened from the existing adopted policy and was developed in close consultation with Historic England. It also includes specific monitoring indicators to ensure effectiveness of the policy and impacts of development on the site are reviewed annually. There is also a policy requirement to undertake Heritage Impact Assessment in line with ICOMOS methodology and this is also a validation requirement for applications when

they are received. A guidance note on Heritage Impact Assessment has been published and will support implementation of the Plan and ensure applicants understand and comply with these requirements.

London Borough of Lambeth

The London Borough of Lambeth lies on the other side of the river Thames directly opposite the World Heritage Site. Some development near the south bank could have the potential to affect the setting of the World Heritage Site.

The draft revised Lambeth Plan was submitted to the Secretary of State on 22 May, 2020, and the Examination in Public took place in October/November 2020. This plan also includes a specific and detailed policy on Westminster World Heritage Site, which seeks to protect and enhance the Outstanding Universal Value of the setting of the site. The UNESCO Mission recommendations also formed part of the background information provided to the Inspector reviewing the plan. Lambeth is also currently consulting on guidance on local views which includes guidance on Westminster World Heritage Site views.

London Borough of Southwark

Southwark is a river-facing borough located near the World Heritage Site to the south and east of the Property. Over the past 5 years, the council has been preparing the New Southwark Plan (NSP). The New Southwark Plan, Submission Version (Proposed Modifications for Examination) was submitted to the Secretary of State in January 2020 for Local Plan Examination. In April 2020, the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. A further round of consultation is currently taking place on the updated version of the plan. It is anticipated that the updated New Southwark Plan (NSP) will be adopted in 2021 following the Examination in Public. The NSP includes a new specific policy on P23 on World Heritage Sites which states that: *“Development will only be permitted when the Outstanding Universal Value of World Heritage Sites and their settings are sustained and enhanced. This should include views into, out of and across sites.”*

London Borough of Wandsworth

Wandsworth adjoins the City of Westminster on its southern boundary and is one of the partner boroughs involved in managing the setting of the World Heritage Site. Wandsworth’s existing Local Plan was adopted in March 2016. As set out in Core Strategy Policy IS3e, views of the Westminster World Heritage Site are protected in accordance with the London Views Management Framework.

Wandsworth is currently preparing a new Local Plan, the first draft of which is at the committee review stage. Public consultation on the proposed submission version of the Plan is expected early in 2021. This will be a full review of the Local Plan and included within the Heritage policy will be a reference to the protection of the Outstanding Universal Value of the Westminster World Heritage Site, and in particular views to, from and across it.

Policy Extracts

As requested by the Committee, we have included policy extracts as well as links to the full documents referred to in this report in **Annex A**.

We consider that the measures detailed will provide a much clearer focus and priority on the protection of OUV, and clear guidance from local to national levels on how to implement these policies in practice.

To assist with policy implementation, the Greater London Authority and boroughs adjoining the site are all using 3D digital mapping systems that facilitate analysis of proposals and their cumulative impacts having regard to the London View Management Framework

5. *Also requests the State Party to provide a detailed timeframe for the review of the Management Plan of the property, including the detailed conservation plan for the Palace of Westminster and the Conservation Management Plan for Westminster Abbey, and reiterates its request to finalize the review process as soon as possible and submit it to the World Heritage Centre, for review by the Advisory Bodies, prior to its adoption*

The review and updating of the Management Plan is ongoing and the new Westminster City Plan contains a specific policy commitment to complete this. As noted previously, this work builds upon and updates the management plan produced for Westminster in 2007, aiming to create a more streamlined management plan which will be maintained online as a ‘living document’ which can be more easily updated in future. This has been prepared to bring together and signpost, but not duplicate, other ongoing work and documents. It will sit alongside the more detailed Conservation Plan for the Palace of Westminster.

The City of Westminster has initiated work on the new management plan, however this was paused earlier this year due to Covid. However, work is now continuing and Historic England have commented on some of the draft work. Further engagement with key steering group stakeholders on this draft material is due to commence in late 2020, with full public consultation scheduled for early 2021. At that point, the draft Plan will be submitted to the World Heritage Centre for review and comment. A detailed project timeline is provided in Annex B.

In addition, an updated conservation management plan has also been prepared for the Palace of Westminster and is now substantially complete. Westminster Abbey must carry out quinquennial inspections, which provide a similar level of detailed management guidance. The State Party can provide this full document if requested.

6. *Also takes notes that major conservation works are planned as part of a Restoration and Renewal project for the Palace of Westminster and also requests the State Party to submit details, including Heritage Impact Assessments (HIAs) prepared in conformity with the ICOMOS Guidelines on HIAs for World Heritage cultural properties, to the World Heritage Centre for review by the Advisory Bodies, as soon as these are available and before any decision is taken or approval is issued;*

The Restoration and Renewal Programme has been set up to oversee the major refurbishment of the Palace of Westminster, which will be the biggest and most complex renovation of a heritage building ever undertaken in the UK.

As one of the key assets in the Westminster World Heritage Site, the Palace of Westminster is one of the world’s most iconic buildings, and the heart of UK democracy. The vision for the programme is “to transform the Houses of Parliament to be fit for the future as the

working home for our Parliamentary democracy, welcoming to all and a celebration of our rich heritage”.

The R&R Programme has seen major progress in 2020, with a number of milestones. The Parliamentary Buildings (Restoration and Renewal) Act received Royal Assent on 8 October 2019, and makes provision in connection with works for, or in connection with, the restoration of the Palace of Westminster and other works relating to the Parliamentary Estate. Under the provisions of this Act, on 8 April 2020, the Restoration and Renewal Programme Sponsor Board and a separate Delivery Authority were set up as statutory bodies to oversee the programme. This is a major step forward in the delivery of the restoration of the Palace.

At present, an outline business case is being produced, which will establish the brief and scope of the proposals, before detailed proposals begin to be developed. The Sponsor Board has established a Conservation Framework Group, consisting of a panel of independent experts, to work with the Programme to establish a statement of historic significance for the Palace. This will be used as the baseline on which proposals will be developed and assessed.

Engagement has commenced in 2020 with Westminster City Council and Historic England on the high-level goals, themes and objectives set by the Sponsor Board for the Programme. Through this ongoing engagement, discussions about heritage impact and opportunities to enhance and better reveal the Outstanding Universal Value of the Westminster World Heritage Site are underway and will continue as detailed proposals are produced and decision-making advances. The R&R Programme acknowledges and is working to ICOMOS’s guidance on Heritage Impact Assessment and proposals are being continually assessed for their heritage impact and benefits. It should be appreciated that the planning for R&R is still at a very early stage and that the programme is not yet at the stage where the initial HIA scoping procedure advised by ICOMOS can be undertaken. The State party will notify the World Heritage Centre in line with paragraph 172 of the *Operational Guidelines* when the scoping stage of the HIA is reached in order to help guide decision making as the proposals begin to be developed in detail.

The R&R Programme is represented on the WHS Steering Group, and contributes proactively to the update of the WHS Management Plan.

The R&R Programme has agreed to provide regular updates on the Programme at key stages in its development to the World Heritage Centre’s Advisory Bodies. The timeframes for the advancement of R&R’s proposals through the statutory planning system are still not fixed, but it is anticipated that the planning applications for the project will not be submitted in the mid-2020s, with construction unlikely to commence before the latter part of the decade.

7. *While strongly supporting the concept of a Holocaust Memorial and Learning Centre in London, expresses concerns that the proposed monument and its underground rooms located in Victoria Tower Gardens, as currently presented, would have an unacceptable adverse impact on the Outstanding Universal Value (OUV) of the property and therefore further requests the State Party to pursue alternative locations and/or designs;*

The planning application for the UK Holocaust Memorial and Learning Centre is being considered and no decision has yet been made. The State Party wrote to the World Heritage Centre in January 2018 to provide an update on the winning competition design and the process

and programme to be followed through to the grant of planning permission. This letter invited comments on the winning design and offered to present the developing scheme to the World Heritage Centre. The consequent Technical Review undertaken by ICOMOS was submitted to the design team and the local Planning Authority. The location within Victoria Tower Gardens near the Palace of Westminster was chosen to serve as a reminder of the far-reaching consequences of political decisions.

The application for the memorial was “called in” by the Secretary of State for the Ministry of Housing Communities and Local Government in December 2019. A public inquiry was held in November 2020, and the results of this inquiry will help inform the decision making for this project. Advice from ICOMOS and ICOMOS UK was submitted to this inquiry.

8. *Further reiterates its request expressed in Decision 41 COM 7B.55 for the State Party to expedite the implementation of the 23 recommendations of the 2017 Reactive Monitoring mission;*

As reported in the previous State of Conservation Report, progress towards the implementation of the 23 Recommendations is ongoing, with actions taken in relation to all of these. This remains a continuing and iterative process. The forthcoming management plan will also incorporate all the main themes set out in the recommendations. This Plan will be used to monitor and review progress. Further detail on progress can be found in Annex D.

9. *Acknowledges the creation of an independent charity, World Heritage UK, nevertheless, strongly advises the creation of a joint committee to help coordinate the Management of the World Heritage properties in London; similarly, urges the State Party to create an advisory committee with a strong influence on decision making, which will contribute to the management of all World Heritage properties in the United Kingdom;*

In addition to the meetings of World Heritage UK, the Greater London Authority (GLA) has set up joint meetings for coordinators at London World Heritage Sites that has now met on several occasions. This provides an opportunity for the sharing of information and good practice between London sites.

As set out in previous reports, the independent charity, World Heritage, UK was set up in 2015 to undertake networking, advocacy and promotion for the UK’s 32 World Heritage Sites, and for Tentative List sites progressing towards World Heritage inscription.

When taken together with the advice of the statutory natural and cultural heritage agencies within the UK, the State Party respectfully suggests to the Committee that the establishment of a further advisory body would duplicate existing sound arrangements for national advice on decision making.

10. *Strongly recommends that the State Party reinforce the role of the national heritage advisor, Historic England, in all levels of decision-making, and especially when determining if a project application should be called in by the Secretary of State, and notify the World Heritage Centre, in conformity with Paragraph 172 of the Operational Guidelines, of projects in the immediate and wider setting of the World Heritage property that may have a negative impact on OUV;*

As noted in previous reports, Historic England play a significant role in all parts of the policy development and decision-making process and are a statutory consultee with regards to a wide range of development proposals affecting the buildings in the World Heritage Site and their settings. They are particularly closely involved in all aspects of decision making in relation to the Palace of Westminster through its Government Historic Estates Unit and are a very active part in all early discussion on Restoration and Renewal and other projects in the Government Estate.

Historic England's role includes advising the State Party on whether to call in applications and they work closely together and with the Ministry for Housing, Communities and Local Government to ensure that decisions on whether or not to call in applications are fully informed by an understanding of the requirements of the World Heritage Convention to protect OUV.

Under The Town and Country Planning (Consultation)(England) Direction 2009, Local Planning Authorities are required to refer to the Secretary of State (SoS) any application they are minded to approve, where Historic England has objected. Objections can be based on such grounds as adverse impact on the outstanding universal value, integrity, authenticity or significance of a World Heritage Site or its setting.

Once an application has been referred to the Secretary of State, the SoS will decide whether to "call in" the application for his own determination, based on an established set of principles. Reasons can include significant architectural and design issues and which give rise to substantial cross-boundary or national controversy. While there is a requirement to refer applications to the SoS when Historic England has objected it should be noted that any individual or organisation can ask the SoS to call in an application in line with the principles. Recent call-ins on proposals where impacts on the World Heritage Site are being considered have not arisen as a result of Historic England objections.

In consultation with Historic England, the State Party notifies all developments within the immediate and wider setting with the potential to impact significantly on the OUV of a World Heritage site to the World Heritage Centre at as early a stage as possible, as per the guidelines set out in Paragraph 172 of the Operational Guidelines. As set out in previous SOC reports, we recognise that notifying early in the process can help ensure that recommendations from the Committee and Advisory Bodies can be fully considered when planning decisions are taken.

*11. Finally requests the State Party to submit to the World Heritage Centre, by **1 December 2020**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 45th session in 2021*

This report is submitted in response to the Committee's request.

3. Other current conservation issues identified by the State Party.

Additional information in response to the mission recommendations is available in the Annexes of this report.

4. In conformity with paragraph 172 of the Operational Guidelines, please describe any major restorations, alterations and/or new constructions(s) envisaged within the protected area and its buffer zone and/or corridors

In conformity with Paragraph 172, the State Party provides detailed information about proposals which have the potential to affect the World Heritage site or its wider setting as they arise.

5. Public access to the state of conservation report

The State Party is content for the full report to be uploaded to the World Heritage Centre's State of Conservation Information System.

6. Signature of the Authority

A handwritten signature in black ink, appearing to read 'Enid Williams', with a long horizontal stroke extending to the right.

Enid Williams
World Heritage Policy Adviser

Annex A Planning Policy Extracts and Link to draft plans

Greater London Authority - Intend to Publish London Plan 2019

Available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

Policy HC2 World Heritage Sites

A Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.

B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

C Development Proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

D Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

Supporting text

7.2.1 The UNESCO World Heritage Sites at Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and the Tower of London are among the most important cultural heritage sites in the World and are a key feature of London's identity as a world city. In ratifying the World Heritage Convention, the UK Government has made a commitment to **protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites** and to protecting and conserving **their settings**. Much of this commitment is discharged by local authorities, including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.

7.2.2 The context of each of the four London World Heritage Sites is markedly different and the qualities of each is conditioned by the character and form of its surroundings as well as other cultural, intellectual, spatial or functional relationships. The **surrounding built environment** must be carefully managed to ensure that the attributes of the World Heritage Sites that make them of Outstanding Universal Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries

7.2.3 The **setting of London's World Heritage Sites** consists of the surroundings in which they are experienced and is recognised as fundamentally contributing to the appreciation of a World Heritage Site's Outstanding Universal Value. As all four of London's World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding landscape. Changes to the setting can have an adverse, neutral or beneficial impact on the ability to appreciate the sites' Outstanding Universal Value. The consideration of **views** is part of understanding potential impacts on the setting of the World Heritage Sites. Many views to and from World Heritage Sites are covered, in part, by the London Views Management Framework (see Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework). However, consideration of the attributes that contribute to their Outstanding Universal Value is likely to require other additional views to be considered. These should be set out in World Heritage Site Management Plans (see below) and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques.

7.2.4 **Policies protecting the Outstanding Universal Value of World Heritage Sites** (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur. It is expected that boroughs' plans (including but not limited to the following) should contain such policies: City of London (Tower of London WHS); Royal Borough of Greenwich (Maritime Greenwich WHS); Hounslow (Royal Botanical Gardens Kew WHS); Lambeth (Westminster WHS); Lewisham (Maritime Greenwich WHS); Richmond (Royal Botanical Gardens Kew WHS); Southwark (Tower of London WHS, Westminster WHS); Tower Hamlets (Tower of London WHS, Maritime Greenwich WHS); Wandsworth (Westminster WHS); City of Westminster (Westminster WHS). Supplementary Planning Guidance will provide further guidance on settings and buffer zones.

7.2.5 Boroughs should ensure that their Local Plan policies support the management of World Heritage Sites, details of which can be found in **World Heritage Site Management Plans**. For Outstanding Universal Value, Management Plans should set out:

- **the attributes that convey the Outstanding Universal Value, and**
- the management systems to protect and enhance the Outstanding Universal Value of the World Heritage Sites.

7.2.6 The Mayor will support steering groups in managing the World Heritage Sites and will actively engage with stakeholders in the development and implementation of World Heritage Management Plans. It is expected that the boroughs with World Heritage Sites, GLA, Historic England and neighbouring boroughs will be part of the **World Heritage Site Steering Groups** that contribute to the management of the sites, including the drafting and adoption of Management Plans

Westminster City Council - Westminster City Plan 2019-2040

Full plan available at - <https://www.westminster.gov.uk/cityplan2040>

Extract from Policy 40 Heritage (incorporating modifications)

WESTMINSTER WORLD HERITAGE SITE

C. The Outstanding Universal Value (OUV), authenticity and integrity of the Westminster World Heritage Site will be conserved and enhanced. The setting of the site will be protected and managed to support and enhance its OUV.

D. Development will protect the skyline prominence and iconic silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance significant views out of, across and towards the World Heritage Site.

E. The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. The council will commit to lead the production and review of an updated World Heritage Site Management Plan.

F. Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed informed by Heritage Impact Assessment methodology and that any harm, including cumulative harm has been avoided or justified.

Supporting Text

40.4 / The inscription of the Palace of Westminster and Westminster Abbey, including St Margaret's Church, as a World Heritage Site recognises its Outstanding Universal Value (OUV). As a designated heritage asset of international importance, it is of the highest level of significance and must be afforded the highest level of protection and maximum weight possible in the planning process. Development beyond the designated boundary but within the setting of the site can also affect its OUV. Its setting is not precisely defined.

40.5 / Where development will affect the site or its setting, applicants will be required to demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information will be provided to demonstrate impacts have been considered. Depending on the scale and nature of proposals in addition to the heritage statement, this should include a Heritage Impact Assessment using the methodology set out by ICOMOS.² Applicants should refer to the Statement of Outstanding Universal Value for a summary of what makes the site significant and the key attributes of OUV identified in the management plan.

40.6 / A number of significant projects will affect the World Heritage Site during the Plan period, in particular the Restoration and Renewal of the Palace of Westminster. We will work with partner organisations to ensure potential for the positive contribution of such projects to the conservation, enhancement and communication of OUV of the site and its setting is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm and approaches and ceremonial routes to the site, security measures and visitor experience will be encouraged and initiated where possible. We will support production of conservation management plans for the Palace of Westminster and Westminster Abbey to ensure the protection of the key buildings within the site and will lead work with the steering group to update the management plan for the site, which is a key tool for the long-term sustainable management of the site and its setting.

40.7 / The striking silhouettes and iconic views of the Palace of Westminster and Westminster Abbey contribute significantly to an understanding of its Outstanding Universal Value. The site's prominence and riverside location means that development at some distance, including outside the City of Westminster, can affect it. We will continue to work to protect views towards the site and its wider setting and ensure the cumulative impacts of development within its setting are understood and managed.

This is supported by **guidance on HIA**.

Extract from Policy 41 Townscape and Architecture

WESTMINSTER VIEWS

F New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.

41.16 Westminster's unique townscape gives rise to some of the most familiar and cherished views of London. These include views of the River Thames and its frontages, the Royal Parks, as well as many other 'picture postcard' views of famous London/ There is a hierarchy of protected views in terms of their significance, sensitivity and status in the planning system. Strategic views are those which are considered to help define the character of London and are identified in the London Plan - eighteen of these affect Westminster. Several of these are protected vistas and have geometrically defined viewing corridors, subject to specific protection and height limits. Several designated townscape views and river prospect views are focused on the Palace of Westminster and protect its silhouette. Guidance on these views is set out in the London View Management Framework.

41.17 Local views are valued for their contribution to Westminster's distinctive character areas. These may contribute to the appreciation of important listed and other landmark buildings or distinctive skylines or groupings of buildings, historic parks and gardens, and views along or across the River Thames and Westminster's canals. Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city. The council will publish a list of views of metropolitan importance and prepare guidance on their management. World Heritage Site view will be identified in the management plan. Other views are important at a local level and may be identified by us or local communities in conservation area audits, neighbourhood plans or other area-based studies.

41.18 New development should make a positive contribution to the characteristics and composition of significant views, both strategic and local, and improvement to significant views will be encouraged. This may include a proactive approach to view enhancement by repairing past damaging development. For example, opportunities should be taken to reduce the scale and impact of existing harmful

buildings in the foreground or middle ground of protected vistas. Careful consideration of building materials and finishes can make proposals more sympathetic in long distance views. A proportionate approach to view protection will be taken, taking into account the significance of the view and magnitude of impact of proposals.

41.19 We will work with adjoining boroughs to ensure the impact of development in Westminster on protected views in other boroughs (and vice-versa) is understood and managed carefully and sensitively. Potential impacts on views should be identified through visibility analysis, supported wherever possible by the use of accurate 3D digital modelling

London Borough of Lambeth - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

<https://www.lambeth.gov.uk/sites/default/files/pl-draft-revised-lambeth-local-plan-proposed-submission-version-Jan-2020.pdf>

Policy Q19 Westminster World Heritage Site

a) Development affecting the setting and approaches of the Westminster World Heritage Site will be required to demonstrate that it:

- i) preserves or enhances the Outstanding Universal Value, authenticity and integrity of the World Heritage Site (as set out in the official statement of Outstanding Universal Value and its setting;
- ii) preserves or enhances the environmental quality of the public realm approaches/vantage points; and
- iii) provides the opportunity to better understand, reveal and appreciate and reveal the Outstanding Universal Value, authenticity and integrity of the site.

b) Where existing development is identified (through area appraisals, characterisations or similar studies) as negative elements in the setting of approaches to the Westminster World Heritage Site the council will support proposals which address the adverse impact through demolition/removal, height reduction or re-cladding.

Supporting text

10.103. Westminster Abbey, the Palace of Westminster and St Margaret's Church were together inscribed as a world heritage site in 1987 ('Westminster World Heritage Site'). World heritage sites are recognised as internationally important and their inscription by UNESCO highlights their Outstanding Universal Value which is a key consideration to take into account when determining planning applications. See Annex 7 for further information.

10.104. The World Heritage Site's location on the bank of the River Thames makes it highly visible from within Lambeth. Indeed, the most impressive views of the Houses of Parliament's striking silhouette and some of the most attractive approaches/views (by river,

by road, by air from the London Eye, and on foot) are from within the ‘immediate setting’ in Lambeth. Equally important is Lambeth’s role as a in the ‘wider setting’ or ‘backdrop’ to the World Heritage Site in views from within the City of Westminster (in terms of clear sky) and in views from the Thames bridges (in terms of urban context).

10.105. The presence of Lambeth Palace immediately across the river from the Houses of Parliament, and what this represents in terms of the separation of Church and State, adds a further layer of significance which requires careful management.

10.106. An uncluttered, well-ordered and attractive urban environment, including public realm, is key to maintaining a suitable setting and approaches to for the World Heritage Site. New development within this context should be well mannered and subordinate in terms of form, materiality and treatment in order to ensure that the Palace of Westminster retains its pre-eminence within the cityscape.

10.107. The adopted World Heritage Site Management Plan (May 2007) will be a material consideration when considering proposals. The council has prepared setting studies and mapped the approaches and immediate setting to inform that work and will continue to work in partnership with all relevant authorities stakeholders in the ongoing work of maintaining, updating and preparing the management plan and any associated documents such as a setting studies study. The council sees no conflict between this aspiration and the continued role of the South Bank’s public realm in providing a rich and varied temporary arts, culture and leisure offer.

10.108. The potential adverse impact of tall building development within Lambeth on the wider setting of the World Heritage Site has been / is a matter of concern for UNESCO. This concern necessitated the 2017 2011 ICOMOS Monitoring Mission. Applicants will be expected to demonstrate that full account has been taken of the impact of their proposals on the World Heritage Site, its attributes and its setting and provide a full impact assessment to support their proposal using the methodology set out in the Mayor of London’s World Heritage Sites Guidance on Settings Supplementary Planning Guidance (2012) and ICOMOS’s Heritage Impact Assessments for Cultural World Heritage Properties (2010). See also London Plan policy HC2.

London Borough of Southwark

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan>

The NSP includes a new specific policy on P23 on World Heritage Sites which states that:
“Development will only be permitted when the Outstanding Universal Value of World Heritage Sites and their settings are sustained and enhanced. This should include views into, out of and across sites.”

Annex B World Heritage Site Management Plan Review- Timeline

Work on the management plan was undertaken in 2018/19 subdivided into themes -around understanding, conserving and managing following themes identified at stakeholder workshop. Text has been drafted, including general descriptive text, summary history, draft attributes and statement of significance, draft vision, and draft text on management and a policy review, as well as supporting information for appendices which was provided to consultants with initial deadline of May last year for draft and the following timeline now proposed.

November 2019	Procurement exercise
December 2019 – October 2020	<p>Consultants Commissioned to review previously prepared text and bring together supporting information, including steps as set out below-</p> <p>Part 1 Understanding</p> <ul style="list-style-type: none"> (i) Review draft attributes and provide suggested changes and additions. (ii) Prepare new overview description of World Heritage Site Setting, using existing world heritage site management plan as a basis, describing spaces and elements which make up setting and link to identified attributes. (iii) Review and draw together existing draft text and information into a single report ‘understanding’ to provide a description of the site and its setting and how different elements contribute to OUV <p>Part 2 threats and issues state of conservation and key conservation and management issues facing the world heritage site, updating the text within the existing management plan and prepare a summary synthesis of the ICOMOS/ICCROM missions to the site and issues raised.</p>
November 2020	Westminster City Council review submission and bring together as consultation report incorporating policy review, appendices and gazetteer and other information and questions
December 2020/January 2021	<p>Outline management plan text disseminated to key stakeholders.</p> <p>– all initial feedback requested by end of January</p>
January 2021	–workshop to feedback on report and identify actions objectives, which flow from this building on previous discussions to create Part 3 Management and Actions
February 2021	Incorporation of further Key Stakeholder feedback and development of Action Plan
End February 2021	Agreement to proceed to full Public Consultation – steering group
March 2021 (8 Weeks)	Full public consultation, including submission of draft plan to World Heritage Centre.
April 2021	Incorporate Stakeholder Feedback
May/June 2021	Review and sign off by stakeholder group members

Annex C - Other Development Updates

In addition to the Paragraph 172 notifications set out in the main report, we note your request for a copy of the tall buildings database and update on Vauxhall Cross/ Vauxhall island sites. This update is below, and the database provided separately.

Vauxhall Cross/Vauxhall Island Sites; Application reference 17/05807/EIAFUL; Appeal Reference APP/N5660/V/19/3229531 - London Borough of Lambeth.

Proposal - Construction of a commercial-led mixed-use development comprising two towers of 53 and 42 storeys, with a connecting podium of 10-storeys; containing 19,695 sq.m. of office space; a 618 room hotel; 257 residential units; 646 sq.m. of flexible ground floor retail uses; and a new public square.

As set out in the previous State of Conservation report, proposals have been revised from those originally approved for the site. The most recent proposal by Zaha Hadid Architects is for a two tower scheme. While it would reach higher than the earlier approval, its more slender form and massing is considered to reduce the potential for harm to OUV as well as achieving better integration with the emerging Vauxhall tall building cluster. Following consideration by the London Borough of Lambeth, the application was called in by the Secretary of State and planning permission granted after a Public Inquiry earlier this year). A Summary of the Secretary of state's decision and reasons can be found here- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878707/Combined_DL_IR_R_to_CLand_bounded_by_Wandsworth_Rd_Parry_St_Bon_dway_Vauxhall_Bus_Station.pdf

Annexe D Mission Recommendations

Recommendation 1, 2 and 3 - Awareness of OUV and effectiveness of policy frameworks:

Recommendation 1 Awareness materials should be developed to provide all stakeholders in the process with more information about the World Heritage Convention, and in particular, the concept of Outstanding Universal Value. These materials should be widely distributed, and an emphasis should be given to the management and protection aspects of OUV.

Recommendation 2 Policy and guidance materials should be written in as concrete a manner as possible to reduce the possibility for interpretation in a way that is not consistent with the protection of OUV. Steps have been taken in recent years to do so, but the disconnect between the words within the policies and the results on the ground still remains large enough for concern.

Recommendation 3 The State Party should consider revising its planning and policy documents to ensure that the protection of OUV is given the maximum weight possible when balancing the harm to the heritage vs. the potential benefit. These policies should continue to emphasise sustainable development approaches to development at World Heritage properties and their settings. But, as a first principle, these developments should have as a centrepiece, a requirement for protection of OUV.

Progress on work on awareness raising including training and policy formulation is ongoing, as set out in this and previous reports. Historic England, in partnership with the UK National Commission for UNESCO and the State Party, have continued to disseminate training courses on Managing World Heritage sites over the past year including webinar based online training allowing a wider audience to be reached. E-learning on world heritage sites is now available online here - <https://historicengland.org.uk/services-skills/training-skills/online-training/elearning-modules/>

As set out in the main body of the report, policy and guidance materials at local and national levels have been reviewed and updated in order to clarify key concepts such as OUV and setting. As planning policies and management plan are now moving towards full adoption at all levels these will be increasingly embedded into decision making and should begin to have greater impact. Results of this will continue to be monitored, through the development plan and management plan monitoring frameworks.

Recommendations 4, 8, 9, 23- Strengthening Governance and management arrangements:

Recommendation 4 Properties recognized as World Heritage (whose preservation and safeguarding is subject of an international treaty signed at State Party level) should enjoy a special status in regard to decision-making at all levels. There is a need for a widening cooperation in the decision-making process, using synergetic capacities among the boroughs, supported by coordination at the level of the Greater London Authority. It should play a much larger role in determining consent when there is a potential for negative impact on the OUV of a property in accordance with the London plan and other policy and guidance documents at the city level.

Recommendation 8: The new management plan for the World Heritage property, which is in preparation, should be finalised as soon as possible by the Westminster City Council, in cooperation with the other members of the Steering Group.

Recommendation 9: Steering Group should be revitalized, with regular meetings and a more action-oriented perspective in regard to overseeing the implementation of the Management

Plan. The Greater London Authority should also take a more active role in the Steering Group (perhaps becoming a co-chair) to bridge differences amongst the boroughs.

Recommendation 22 The Greater London Authority should consider the creation of a “joint committee” or other coordinating structure, which would allow the four World Heritage properties in London to establish mechanisms for networking and cooperation in management and conservation. This process should be open to all boroughs who are involved in the management and conservation of these properties.

Recommendation 23: In a similar fashion, the national government should consider setting up a “joint committee” of all World Heritage properties in the United Kingdom to allow for a better understanding of common problems and a means of developing innovative solutions

Governance and coordination of the Site still needs greater focus, and work on improving this is ongoing. Future governance of the site is being addressed through the management plan and its action plan as set out in the main report. As noted in the main report, the Greater London Authority has also established coordination meetings for the London World Heritage Sites and World Heritage UK provides effective national coordination and support. <https://worldheritageuk.org/>

Recommendation 5, 6 and 15 - Decision-making, call in and role of HE

Recommendation 5: The national government should consider calling in every planning application that has a potential to impact negatively on the OUV of a World Heritage property. In this regard, the advice of Historic England should be given a strong weight in determining when to call in an application. In this way, the obligations of the United Kingdom under the World Heritage Convention can be met more effectively than is currently the case

Recommendation 6: Historic England should be given a stronger role at all levels to give advice on development projects. The organization already does play a significant role, but its advice is sometimes not given the necessary weight when difficult development decisions are taken.

Recommendation 15: The advice of the national heritage advisor, Historic England, should be given a much greater weight by all of the boroughs and other levels of decision-making when evaluating projects and their potential impact on OUV. An objection by Historic England should already be a warning sign to the whole chain of decision-making that there will likely be issues at the World Heritage level.

This is covered in the main body of the report and previous reports. The management plan sets out further process mapping for decision-taking.

Recommendations 12 and 21: Use of Heritage Impact Assessment

Recommendation 12 - The State Party needs to use a more robust method of carrying out Heritage Impact Assessments on any developments, which may have an impact on the OUV of the property. These HIA need to have the strong input and advice of Historic England and should become the basis for any decision-making for approval of development projects.

Recommendation 21: The mission team regrets that the work on the Triforium project was carried out without an HIA and without informing the World Heritage Centre prior to commencement of the project. While it does not appear that this addition will have a negative impact on the OUV of the property, it is recommended that any future work be subject to HIA and information being provided. In the meantime, the mission recommends that full information on the existing project be sent to the World Heritage Centre, as well as a final

report of the works once they have been completed to ensure that there has been no negative impact on the OUV.

Policy in the NPPF, the London Plan and local plans all now recognises the importance of HIA and awareness of this amongst all stakeholders is now greatly enhanced. This emerging policy is supported by advice in National Planning Practice Guidance which specifically refers to the ICOMOS HIA guidance. Information in response to Recommendation 21 was provided with the previous report. However, recent work at the Abbey has been supported by HIA and Historic England were consulted on its scope and content. As set out in the report, a summary note for applicants for planning permission about HIA has been prepared and published on the Westminster website.

Recommendations 13, 14 and 18 - Use of 3D digital modelling

Recommendation 13: The 3D modelling system, that is currently in development, should continue to be refined and developed in a way that allows developers, planners, and decision makers to have a more dynamic system of view protections for the World Heritage property. In regard to views, the system of important views should be reviewed to take into account the possibilities of views at different levels and in “non-traditional” places.

Recommendation 14: The planning process should be revised to take into account the impact, not only of single development proposals, but also the cumulative effects of a number of projects either approved or in the planning stage. Tools such as 3D modelling should be used to more easily see these potential cumulative effects.

Recommendation 18: Views and 3D modelling can help with giving sense of what is wider setting/ immediate setting and using protected silhouettes may help to increase understanding/ effectively create a buffer zone.

3D modelling is increasingly allowing developers, planners, and decision makers to have a more dynamic system of view protections for the World Heritage property and is now used by the GLA and all relevant boroughs and understanding of this is growing and embedded within new policy frameworks. The policies in new London Plan and individual borough local plans highlight the need to consider the cumulative impacts of development, particularly in regard to tall buildings and use 3D modelling in making these assessments. The digital mapping of the height constraints of views that complete a 360-degree setting of the WHS combined with the use of 3D modelling provide an effective tool for managing development in the immediate and wider setting of the WHS.

***Recommendation 10:** An inventory should be created of already issued building permission for tall buildings with indication of the level of their realization (not yet started, started, under construction, almost finished). At least in the context of the World Heritage property it would also be advisable to create a tool for possible amendment during realization (e.g. building stop at lowest level, having less floors as planned etc.).*

A database was prepared following the mission visit to keep track of tall buildings proposals and is periodically updated by the relevant boroughs. An updated version of this is provided with this report. This includes other relevant development proposals which may be contentious or affect the Outstanding Universal Value of the World Heritage Site.

Recommendation 7: Notifying the World Heritage Centre and notification of specific proposals

Recommendation 7 Creative means should be explored with the World Heritage Centre and Advisory Bodies to minimise the impact of non-complimentary timeframes for commenting on and consenting to development proposals.

As set out in previous reports, due to resource pressures and the timings of the committee cycle, it is not possible for the World Heritage Committee to comment on every application submitted to it by the State Party. However, as noted in the main report the State Party consults closely with Historic England on the need for notifications and where Historic England raise concerns or objection in relation to proposals on the basis of impacts on OUV, this will be notified to the Centre. A wider range of consultation options with the World Heritage Centre are also being utilised to ensure that the views of the committee, centre and advisory bodies are considered when decisions are taken, including the submission of ICOMOS technical reports, the direct involvement of the World Heritage Centre and ICOMOS in discussions with local authorities and notifying proposals to the Centre at an early stage when amendments to the proposals can more easily be made.

The State Party is committed to working closely with the World Heritage Centre to ensure that the Centre, Committee and Advisory Bodies have the opportunity to offer advice on planning applications early in their development, when there is the possibility to shape proposals before they are formally submitted for planning consent and has sought to raise awareness amongst all local authorities of the importance of early notification of proposals. The process for notification of the World Heritage Centre is set out in the guidance note on HIA and will be included within the management plan and this encourages engagement as early as possible in the process.

Recommendation 16, 17, 18, 19, 20 – Notification/ Information on specific projects

Recommendation 16: The phased approach to the closure of Abingdon Street, the demolition of the temporary education centre, and the development of an updated visitor management and interpretation strategy is welcomed. In conformity with paragraph 172 of the Operational Guidelines, the State Party should inform the World Heritage Centre as proposals are developed for any changes to the spaces adjacent to the Palace of Westminster, Westminster Abbey, Saint Margaret’s Church, and Parliament Square that may affect the Outstanding Universal Value of the Property.

Recommendation 17: The Holocaust Foundation may wish to consider setting up a mechanism whereby the Jury of the design competition for the memorial is able to get advice from the World Heritage Centre and/or Advisory Bodies before a final decision is taken. In any event, the selected design and related developments should be submitted to the World Heritage Centre, in conformity with Paragraph 172 of the Operational Guidelines.

Recommendation 19 & 20 (Restoration and Renewal):

As more detailed plans are developed for the Restoration and Renewal project for Westminster Palace, the State Party should keep the World Heritage Centre and Advisory Bodies informed as soon as possible, particularly in regard to demolitions or new constructions, but also to any other significant works that may impact on the OUV of the property. This early notice will avoid any misunderstandings as the work progresses. The Restoration and Renewal project offers the Westminster team an opportunity to reconsider the temporary structures for entertaining along the riverside façade of the palace. Any eventual hospitality structures on that important view should take into account the visual impacts from the Lambeth side of the river and should in no way have a negative impact on OUV.

Notifications in relation to the above proposals have previously been or will be submitted to the World Heritage centre in line with paragraph 172 at an appropriate stage. See main report for specific details in relation to Restoration and Renewal and the Holocaust Memorial and Learning Centre.