Tower of London

World Heritage Site

Management Plan

Contents

Foreword

John Barnes, Conservation & Learning Director, Historic Royal Palaces

Historic Royal Palaces is proud to be responsible for the care, conservation and presentation to the public of the Tower of London - one of six important and historic sites in our care. Our aim, through the work that we do, is to help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

In recent years, the Tower has played a part in key moments of national celebration and public engagement, from the Thames Jubilee River Pageant to the 2012 Olympic Games. It has also been a focal point for commemoration; in 2014, the Tower staged *Blood Swept Lands and Seas of Red*, an art installation of ceramic poppies, marking one hundred years since Britain's involvement in WWI. The 'Poppies' were visited by an estimated 5 million people and received a circulation of 1.5 billion worldwide through press and media.

Since the last Management Plan, the Tower has experienced a significant increase in visitor numbers; over 3 million people now visit each year. This has enabled us to invest in major conservation projects to the White Tower, the Wall Walks and the Mural Towers and successful onsite partnership projects: the re-presentation of the White Tower with the Royal Armouries; the development of a new exhibition on the Tower Mint with the Royal Mint, and a re-presentation of the Fusiliers Museum with the Royal Regiment of Fusiliers.

Increased visitors also bring challenges, such as the potential impact on the monument itself and the visitor experience. Against this backdrop, in 2013 Historic Royal Palaces began a piece of strategic work to set a framework for projects at the Tower over the coming decades. This work, our '*Tower Future Thinking',* is reflected in the revised Plan.

The greatest challenge to the World Heritage Site, however, remains the impact on its setting of development and tall buildings. Although slowed in the years after financial crisis, the rate of development is picking up again, greater than before. As well as providing an agreed framework for decision-making on the conservation and improvement of the Tower, the Plan provides a mechanism for considering the setting of the Tower. Local planning authorities are expected to take relevant Plan policies into account in developing their strategies for the historic environment and in determining relevant planning applications.

The revised Plan brings together knowledge, expertise and enthusiasm from those with an interest in, and responsibility for, the Tower of London and its environs. I feel confident that it will provide a positive model for sustaining the outstanding universal value of the Tower of London into the future.

Executive summary

HM Royal Palace and Fortress of the Tower of London (the Tower) is one of England's most evocative ancient monuments. There is a tangible sense of history in every tower and around every corner, making it an endlessly fascinating place for visitors from all round the world. The buildings and layout that we see today stand as the culmination of a sequence which started around 1067, and have developed dynamically ever since in line with the changing needs of the site's occupants, users and visitors.

The Tower was inscribed onto the World Heritage List in 1988. To be inscribed, sites must be of 'Outstanding Universal Value' and meet at least one of ten selection criteria. The Tower was inscribed under two of the required criteria:

Criterion (ii): *To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;* - 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. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.

Criterion (iv): *Be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;-* The White Tower is the example par excellence of the royal Norman castle in the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture.

The Outstanding Universal Value of the Tower is recognised by a number of key attributes including its landmark siting for protection and control of the City of London, as a symbol of Norman power and military architecture, and for its association with State institutions.

The purpose of the Tower of London World Heritage Site (WHS) Management Plan is to ensure the effective management of the WHS for present and future generations and to provide an agreed framework for long-term decision-making on the conservation and improvement of the Tower.

The vision for the WHS is to sustain its Outstanding Universal Value and to manage the Tower effectively in order to protect, conserve and present it to the public and to transmit it to future generations. The Tower benefits from unique characteristics that afford opportunities for its future development. Conversely, these characteristics are fragile and raise complex issues that affect the conservation and management of the site. The Plan seeks to utilise opportunities in a way that is appropriate to the Tower's significance and helps work towards an optimal solution to the challenges and issues faced by the Tower. The Plan sets out the principal aims and management objectives for the Tower, supported by actions, which reflect the opportunities and mitigate, where possible, the challenges and issues highlighted in the Plan.

Our Principal Aims are:
- To conserve the tangible assets of the WHS
- To research and increase our understanding of the Tower in order to support its conservation and interpretation
- To preserve and enhance the local and wider setting
- To sustain and promote the Tower's intangible assets
- To communicate the stories of the Tower and promote the Outstanding Universal Value of the Tower through engaging and effective interpretation
- To ensure the complete visitor experience is reflective of the Tower's WHS status.

Historic Royal Palaces is the lead body responsible for implementing the Plan, in co-operation with its on-site and off-site partners. The Tower of London WHS Consultative Committee, a group including on-site partners, local authorities and heritage specialists, provides a forum for consulting on issues affecting the Tower and its environs. The Committee will continue to review progress on achieving the agreed aims and objectives and assist in monitoring implementation of the action plan every year. The entire Plan will be reviewed again in five years.

1.0   Introduction

1.1   World Heritage and the World Heritage Convention

1.1.1   World Heritage is the designation for places that are of 'Outstanding Universal Value' to humanity and, as such, have been inscribed onto UNESCO's World Heritage List to be protected for future generations to appreciate and enjoy. Outstanding Universal Value means 'cultural and/or natural significance which is so exceptional as to transcend national boundaries and be of common importance for present and future generations of all humanity' (UNESCO Operational Guidelines 2015[1]).

1.1.2   The concept of World Heritage is at the core of the World Heritage Convention, adopted by UNESCO in 1972. The Convention came into force in 1975 and established a World Heritage List as a means of identifying, protecting, conserving and transmitting to future generations those parts of the world's natural and cultural heritage deemed to be of Outstanding Universal Value (OUV) and the concern of the international community as a whole. By ratifying the Convention, State Parties (of which the UK is one) pledge to meet the provisions of the Convention and safeguard World Heritage Sites (WHS) in their territories as part of their agreed policy for protecting their national heritage.

1.1.3   In January 2016, there were 1,031 WHS in 163 countries worldwide, of which 802 were cultural, 197 natural and 32 mixed properties.

1.1.4   The addition of a site or monument to the World Heritage List does not confer additional national legal protection in all countries. However, it does ensure significant international prestige and awareness. It also significantly raises the profile of the site within its own country: by nominating a site or monument for inclusion on the List, State Parties are explicitly stating their commitment to the World Heritage Convention and the importance of the protection and conservation of the monuments that make up the List, and undertaking to protect them.

1.1.5   The Convention and the inscription of sites onto the List is overseen by the World Heritage Committee. The Committee comprises representatives of 21 of the

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[1] UNESCO *Operational Guidelines for the Implementation of the World Heritage Convention* (2015), para.49

countries that have ratified the Convention, each elected for up to six years at a time. It is serviced by UNESCO's World Heritage Centre in Paris. The Centre also advises States Parties to the Convention on the preparation of site nominations (for inscription), organises technical assistance on request, and co-ordinates reporting on the condition of sites and on emergency action to protect threatened sites. It also administers the World Heritage Fund, to which all States Parties to the Convention contribute.

1.1.6   The Centre and the Committee are advised by three international non-governmental bodies: ICOMOS (International Council on Monuments and Sites) on cultural sites; IUCN (World Conservation Union) on natural sites; and ICCROM (International Centre for the Study of the Preservation and Restoration of Cultural Property), which provides expert advice on training and conservation of cultural sites. Once nominated by a State Party and registered by the World Heritage Committee, a potential WHS is evaluated by either ICOMOS and/or IUCN. The final decision on inscription is taken by the World Heritage Committee.

1.1.7   The Committee publishes Operational Guidelines for the Implementation of the World Heritage Convention (known as the 'Operational Guidelines') and these were last reviewed in July 2015. In particular, the guidelines set out the criteria for the assessment of OUV, guidance on nominations and monitoring, arrangements for periodic reporting and the need to facilitate an ongoing consultative process between site managers, government officials and professionals.

1.1.8   Nomination documents set out the case for OUV, including the site's authenticity and integrity, and also the arrangements for the protection and management of properties. Management Plans (Plans) set out in detail how the site is to be managed locally in such a way as to protect, preserve and, where possible, enhance the OUV of the site, through identifying challenges and opportunities and setting appropriate strategies, policies and action plans to address these.

1.2   The UK and the World Heritage Convention

1.2.1   The UK ratified the World Heritage Convention in 1984 and submitted its first Tentative List of potential sites for inscription in 1986. So far, 29 cultural and natural heritage sites in the UK and its overseas territories have been inscribed on the World Heritage List.

1.2.2   The Operational Guidelines emphasise the importance of management systems as an effective way of managing WHS, especially where there is a range of interests. In order to meet its obligation under the World Heritage Convention, the UK government is committed to working with site owners and managers, local authorities and other interested parties to put comprehensive Plans in place for all UK WHS.

1.2.3   Within the UK, WHS do not have separate statutory designation, so no additional planning controls arise directly from the WHS inscription. However, national policy defines WHS as being of 'the highest significance' and requires local planning authorities and the Greater London Authority in London to 'identify and assess the particular significance of any heritage asset [including a WHS] that may be affected by a proposal (including by development affecting the setting of a heritage asset) …and take this assessment into account when considering the impact of a proposal on a heritage asset' (National Planning Policy Framework, March 2012) (NPPF). UK national policy states that effective management of WHS involves both the identification and promotion of positive change that will conserve and enhance their OUV, authenticity and integrity and the modification or mitigation of changes which have a negative impact on those values (Planning Policy Guidance, March 2014) (PPG).

1.2.4   WHS management plans provide a policy framework for guiding and influencing current, planned or potential management initiatives at a variety of scales and for different purposes. Achieving the Plan's objectives depends on all involved working effectively in partnership. Once agreed at national level by Historic England, who advises the Department for Culture, Media and Sport (DCMS), Plans are submitted to UNESCO World Heritage Centre and are then forwarded to ICOMOS for review. Local planning authorities in the UK are expected to take relevant policies in WHS management plans into account in developing their strategy for the historic environment and in determining relevant planning applications.[2]

1.3   The Tower of London World Heritage Site Management Plan 2016

1.3.1   Historic Royal Palaces is responsible for the preparation of the Plan and has lead responsibility for its implementation and monitoring, in consultation with the Tower of London World Heritage Site Consultative Committee.

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[2] Planning Policy Guidance, 'What are World Heritage Site management plans?' (2014)

1.3.2   The Tower has a number of off-site partners and the Tower of London World Heritage Site Consultative Committee provides a forum in which proposals, issues and challenges can be reviewed and addressed with the benefit of their expertise. This body meets at least once a year and monitors the implementation of the action plan.

1.3.3   The Tower has a number of on-site partners, including:

- Royal Collection Trust, principally in the context of the Crown Jewels, but also with regard to items in Queen's House;
- The Royal Armouries, in terms of the exhibition and storage of their collection;
- The Ministry of Defence, which provides the military guard for ceremonial and security purposes, and is responsible for their accommodation.
- The housing and maintenance of two regimental headquarters, those of The Royal Regiment of Fusiliers and The Princess of Wales's Royal Regiment. The former headquarters includes the museum of the Royal Fusiliers (City of London) Regiment.
- The Royal Mint in a joint exhibition called "Coins and Kings" in Mint Street.

Management of the Tower needs to reflect the activities and objectives of these partners, and also respect the significance of the WHS.

1.3.4   Historic Royal Palaces is an independent charity which receives no funding from government. We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers. In order to sustain the WHS and its protection and interpretation, money is generated through visitor entrance fees, retail revenue, revenue from functions and events, membership, sponsorship, grants and donations. The needs of the Tower must be considered in the context of competing requirements from the other palaces in Historic Royal Palaces' care. The Tower benefits from the organisation-wide revenue-raising objectives identified in Historic Royal Palaces' strategic and annual operating plans, as well as specific fund-raising projects, and it is recognised that revenue generation must sustain the OUV of the Tower.

1.3.5   The aims and objectives identified in the previous Plan, adopted in 2007, have been reviewed and updated, following completion of previous actions set, and

in light of current opportunities, challenges and issues. With the benefit of the experience gained from the previous Management Plan, we are able to define more specifically in this Plan our aims and objectives for the next five years.

1.3.6   In 2013, Historic Royal Palaces carried out detailed work to identify the challenges currently facing the Tower of London as a visitor attraction and to develop a strategy that would help shape future projects. This exercise has been described as Historic Royal Palaces' '*Tower Future Thinking'*. The process engaged the Tower's stakeholders, seeking feedback and input, and resulted in a number of 'Guiding Principles' and 'Key Themes', which will be used to shape and prioritise future projects at the Tower and guide overall aims to improve the visitor experience. The strategy will act as a 'blue-print' for the future of the Tower, setting out the direction of travel for the next 10 – 50 years. This work has been incorporated, where appropriate, into the Plan.

1.4   The purpose of the Management Plan

1.4.1   The purpose of the Plan is to ensure the effective management of the WHS for present and future generations and to provide an agreed framework for long-term decision-making on the conservation and improvement of the Tower. The Plan embraces the physical preservation of the Tower, protecting and enhancing the visual and environmental character of its local setting, providing a consideration of its wider setting and improving the understanding and enjoyment of the Tower as a cultural resource. It contains management aims and a prioritised programme of objectives for the next five years, when the Plan will again be reviewed.

1.4.2   The Plan has been prepared at a time when the development cycle affecting the setting of the WHS, as reflected in the number of applications currently coming forward for major development in the vicinity of the Tower, appears to be picking up again after several years of recession. The standard of conservation and presentation to the public of the property itself remains high, however, and continues to improve. As well as providing an agreed framework for long-term decision-making on the conservation and improvement of the Tower, the Plan provides a mechanism for considering the setting of the Tower. As the NPPF makes clear, the significance of a designated heritage asset, including a WHS, derives not only from its physical presence, but also from its setting.

1.5   The planning status of the Management Plan

1.5.1   As set out in the NPPF, the government expects local planning authorities to take relevant policies in WHS management plans into account in making plans and planning decisions, and when devising their *Local Plan* documents. This point is emphasised in Policy 7.10 of the London Plan 2015, which provides regional planning policy guidance for London. Appropriate weight should therefore be given to implementing the policies set out in this Plan in planning decisions affecting the Tower of London World Heritage Site or its setting.

2.0   Description of the World Heritage Site

2.1   General information

Name of World Heritage Site

Site C448. HM Royal Palace and Fortress of the Tower of London.

N51 30 29
W0 4 34

Country

England, within the United Kingdom.

City

London (London Borough of Tower Hamlets).
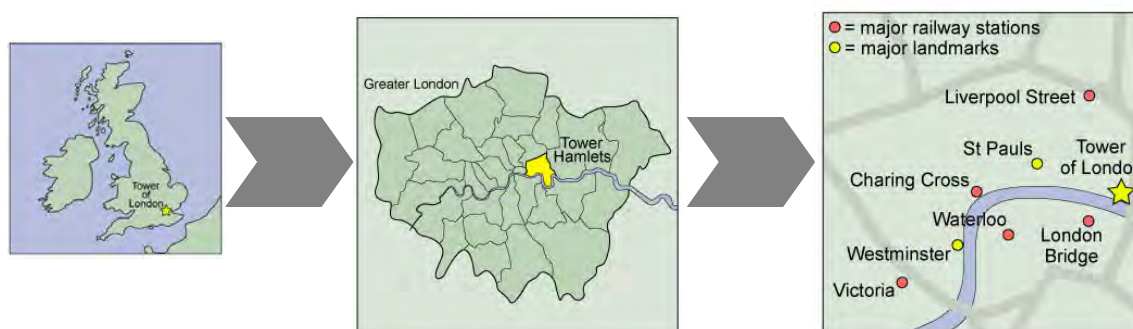
Date of Inscription onto World Heritage List
1988.

General description of interest

2.1.1   The Tower of London is one of England's most evocative ancient monuments. There is a tangible sense of history in every tower and around every corner, making it an endlessly fascinating place for visitors from all round the world. The buildings and layout that we see today stand as the culmination of a sequence which started around 1067: they have developed dynamically ever since, in line with the changing needs of the site's occupants, users and visitors.

2.1.2   The extant buildings conceal earlier generations of palatial accommodation, defences, stores and taverns. The evidence for this intensive development survives below visitors' feet as walls, foundations and other remains, often in extremely good condition. The extraordinary wealth and depth of these remains is symptomatic of the site's long and complex history.

2.1.3   The construction of the Tower began in the 11th century. As first planned, it lay within the earlier Roman city walls, but its subsequent enlargement, particularly in the 13th century, carried its boundaries eastwards beyond the walls. Nowadays, including the moat, it covers an area of 18 acres/7.3 hectares. The oldest and most important building is the Norman keep, known as the White Tower. The Inner Ward is enclosed within a wall punctuated by 13 towers, the only surviving original entrance to it still in use being that on the south side, under the Bloody Tower. The Outer Ward is defended by a second wall flanked by six towers on the river face, and by two semi-circular bastions at the north-west and north-east corners. A moat, now dry, encircles the whole, crossed at the south-western angle by a stone bridge, formerly a drawbridge, leading to the Byward Tower from the Middle Tower. The Tower was occasionally occupied as a palace by every king and queen until James I. Throughout its history, the Tower has also been used as the principal place of confinement for important State prisoners, from the Norman Bishop Ranulf Flambard in the early 12th century to Rudolf Hess in the 20th. A garrison was latterly housed within the Waterloo Block, built while the Duke of Wellington was Constable of the Tower, with accommodation for some 1,000 men.

2.1.4   Today, the Tower is an unoccupied royal palace open to the public at stated times. It contains the Crown Jewels, the Royal Armouries, the headquarters of the Royal Regiment of Fusiliers and other offices, as well as accommodation for resident staff.

Boundary of the WHS

2.1.5   The nominated boundary of the WHS follows the Tower of London scheduled monument boundary, and includes the Tower itself within the moat, the moat, the wharf along the river, and the area by the Lion Tower (figure 1). Hereinafter this area is referred to as 'the Tower' in this document.

Figure 1: The boundary of the WHS
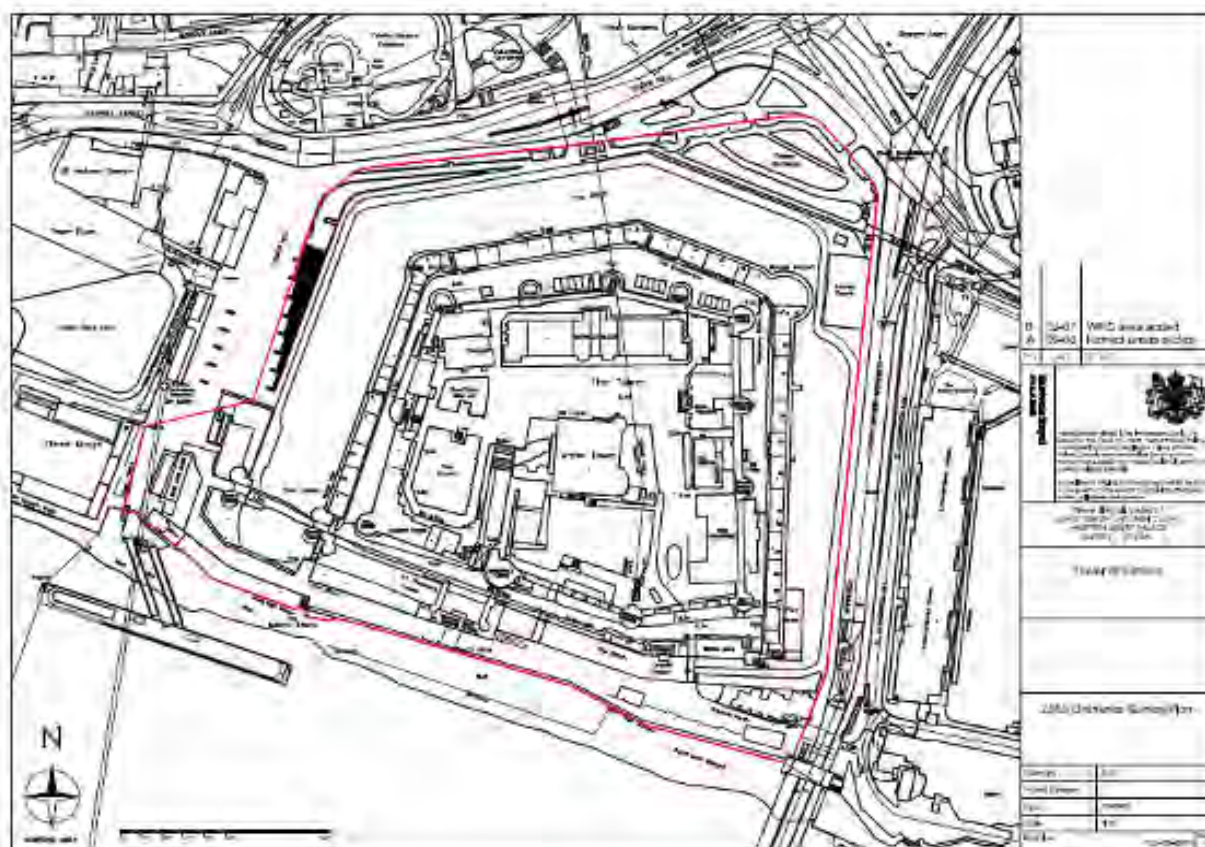
2.1.6   Options for extending the WHS, particularly to include Tower Hill and the Liberties of the Tower, and Tower Bridge, have been considered in previous studies and during the initial preparation of the first management plan. It is considered that, since Tower Hill is directly managed by Historic Royal Palaces and Tower Bridge is in public ownership, and given the scope of statutory protection that already exists, there would be no practical benefit in extending the boundary. Therefore, no extension is proposed, but the boundary should be kept under review as part of the ongoing monitoring of the Plan.

2.2   Summary of the historical development of the Tower

2.2.1   A brief synopsis of key events is provided below as an introduction to the historical development of the Tower and its environs, schematically represented in figure 2 below. A more detailed description can be found in Appendix A.

Figure 2: Schematic representation of the development of the Tower

Late 11th Century
12th Century
Henry III (1216 – 1272)
Edward I (1272 - 1307)
Edward II (1307 – 1327)
Edward III (1327 – 1377)
15th Century
16th Century
17th Century
18th Century
19th and 20th Centuries
21st Century
Moat
River Thames
Buried or destroyed buildings
Position of Roman Wall

© Historic Royal Palaces
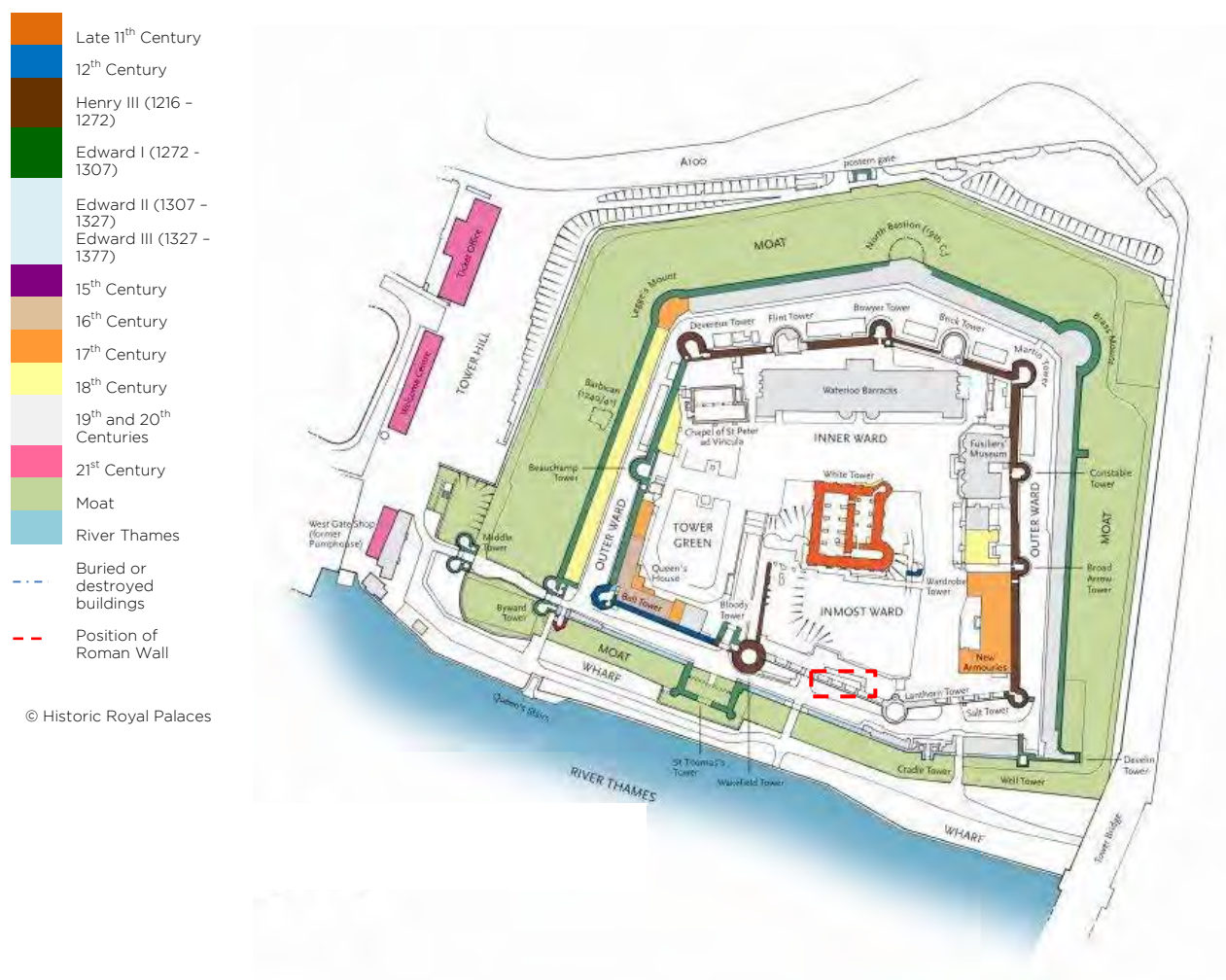
2.2.2   Soon after his victory at the Battle of Hastings in 1066, William Duke of Normandy (r1066-87) advanced on London and secured the city with three earthwork castles. The City had been re-established within the Roman walls by King Alfred late in the 8th century, and in its south east corner William established his castle by constructing earthen ramparts and ditches in the angle between the two walls. About a decade later the White Tower was begun within this fortress, and completed around the turn of the century. Developing the design of the tower at Ivry-la-Bataille in Normandy, it dominated both the (largely timber-built) city and the approach to it up the Thames, although its architectural fourth storey was a screen hiding the roof. Within this small fortress during the 12th century the buildings of a royal palace began to develop, of which the Wardrobe Tower is probably all that survives.

2.2.3   Westward expansion began under Richard I (r1189-99), with Bell Tower, complete by about 1200, forming the new south-west corner of the curtain, with a deep moat beyond. The entrance was thereafter near the centre of the west side. Under Henry III (r1216-72), beginning in the 1220s, the Royal apartments were rebuilt, the Wakefield and Lanthorn towers being the principal survivors. By 1240, the expansion of the original fortress northwards and eastwards was in hand, completing the plan of the Inner Ward as it now exists. Henry's son Edward I (r1272-1307) between 1275-85 added the outer curtain and a moat at least 50m wide, moving the entrance from the centre of the west side to the south-west corner. The Beauchamp Tower replaced the former entrance which had collapsed in 1240 and 1241. With these works, Edward had transformed the Tower into one of the most formidable concentric castles in Europe.

2.2.4   In the later medieval period, the Tower gradually changed from being a royal residence to the home of administrative departments of state, while its increasing role as a military storehouse prompted the building, in stages, of the wharf. The defences were maintained and strengthened, the outer curtain raised to its present height in the 1330s, while successive monarchs developed the royal apartments. The top storey of the White Tower was formed behind the Norman walls in 1490, with a flat roof behind the parapet. The church of St Peter ad Vincula, which had been taken into the fortress in its westward expansion, was rebuilt after a fire c1520.

2.2.5   During the reign of Henry VIII (1509-47) the Tower ceased to be a regular royal residence, although its symbolic and military roles grew with the increased role of artillery and the construction of vast storehouses on the north side of the inner ward. At this time, too, it gained notoriety as a prison for 'religio-political' prisoners and place of royal executions, a role that continued into the 17th century. During the Civil War it was strongly garrisoned for Parliament. With the Restoration (1660) more Ordnance Stores (including the surviving New Armouries building of 1663) replaced the medieval palace buildings.

2.2.6   Great changes took place in the 19th century. The Offices of State moved out and mass tourism began. Architecturally, 'remedievalisation' began when the Grand Storehouse, destroyed by fire in 1841, was replaced by the Waterloo Barracks of 1845, but thereafter the military role of the tower declined. Anthony Salvin restored the Beauchamp Tower in 1851-3, and his successor John Taylor continued the clearance of 17th and 18th century buildings in favour of reconstructing 'missing'

elements of the medieval castle, especially along the riverside. The Second World War saw some military use of the Tower and some bomb damage; subsequently tourism has dominated, with presentation informed by a massive expansion of 'archaeological' study and research. Tower Hill was redeveloped as a simple piazza flanked by visitor facilities in 1999-2004, designed by Stanton Williams.

2.3 The development of the capital city around the Tower

2.3.1 The land on which the Tower was built was appropriated from the City by the Crown and, with it, a more extensive area, which, initially for defensive reasons, separated the urban area from the successive moat lines which enclosed the royal fortress itself. This open area became known as the 'Liberties', since it was free from the City's jurisdiction. Despite some ebb and flow over time, the Liberties continue to separate the fortress from the buildings of the modern city on the north bank of the Thames, just as the river itself does on the south. The formal definition of the Liberties in 1382 was probably to stem encroachment. By that time, the City and its eastern suburb were probably already densely built-up to the boundary of the Liberties, and the Tower faced a developed river frontage on the Southwark bank.

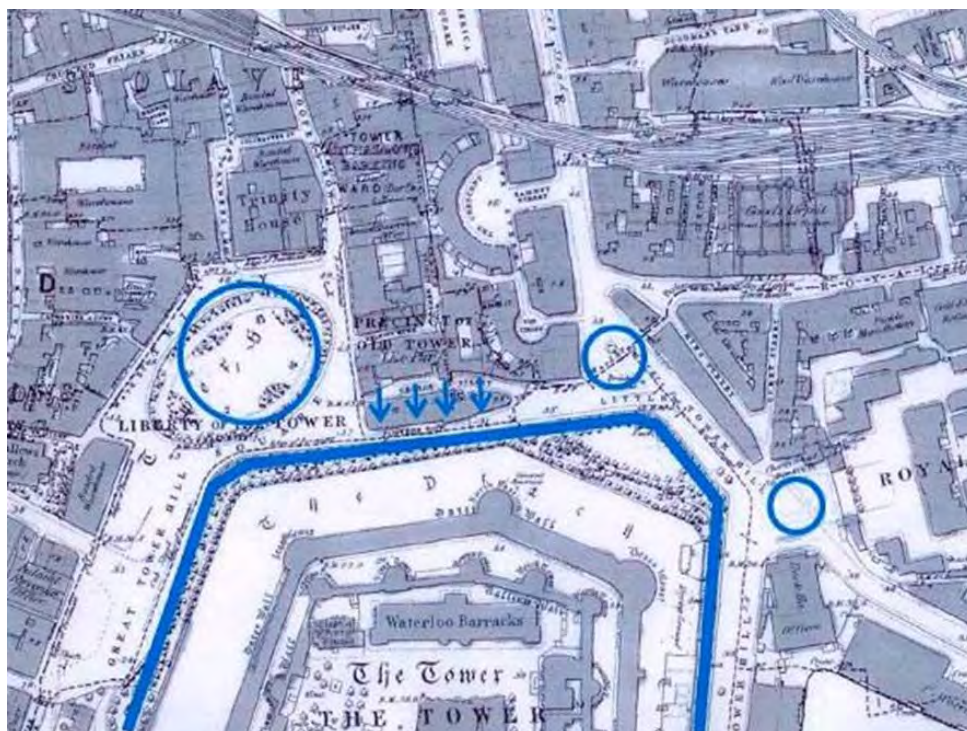*Figure 3: The Liberties of the Tower*

Image reproduced from the Corporation of London Pool of London Partnership Tower Gateway Development Framework and Investment Strategy, Draft Planning and Design Guidance December 2003.

2.3.2   The environs of the Tower started to change noticeably during the late 17th and 18th centuries, with the re-building of the City after the Great Fire of London (1666) and its rapid expansion as the major trading centre and port of the growing British Empire. Notable new skyline features in the setting of the Tower included the Monument, St. Paul's Cathedral and numerous Wren church towers, all but the Monument replacing medieval buildings. However, post-fire secular building down to the 18th century was still largely domestic in scale, as historic panoramas of the City show. No. 42 Trinity Square, just north of the Tower, provides a surviving example, and the adjacent No. 41 shows how the scale tended to grow in the early 19th century, within the same 4-storey formula.

2.3.3   Constructed originally to dominate its surroundings, for centuries the Tower and City grew in parallel, their relationship remaining comparable. However, while the Tower retained a defensive role into the middle of the 19th century, a fundamental change to this relationship was already under way. The Tower stopped growing and, through restoration, indeed shrank, while the scale of city building and infrastructure continued to grow, as London became the capital of the world's largest empire and foremost industrial and maritime power.

2.3.4   The start of the changing relationship between the mass and bulk of the Tower and that of the cityscape buildings addressing it dates from the 1820s, with the construction (to the east) of St Katharine's Dock, flanked by 5-6 storey brick warehouses. Fenchurch Street Station was built to the north in 1841, and a new east-west road cut through to the north of the Tower in 1882-4, followed by Tower Bridge in 1886-94, all prompting commercial development on an increasing scale. The development of the Southwark bank of the Thames, largely with warehouses, happened in parallel. In the 1860's the huge eight-storey Mazawattee Warehouse built by George Myers was erected upon Tower Hill. This building provoked a storm of protest, as it impeded the views of the Tower. It was damaged in the War, and largely demolished in 1951. Today only the two basement levels survive, and are known as the Tower Vaults. The monumental Port of London Authority building of 1912-22, prominent in the northern setting of the Tower, marked both the high point and the culmination of this Imperial phase.

2.3.5   Bomb damage in the Second World War prompted ideas of radical re-planning in the City. The road north of the Tower was further widened and realigned as part of a proposed 'ring road', of which only the southern section was realised. Much of the area to the north and west of the Tower was redeveloped

from the late 1950s for primarily office uses, in accordance with a 'master plan'. These buildings are in turn being replaced, generally by taller blocks of larger scale, as modern highly-serviced offices necessitate greater storey heights. On the Southwark bank, wharves and warehouses have also given way mostly to offices, with some historic buildings being retained and converted. More London is the largest development, again to a 'master plan', which has created a new pattern of pedestrian circulation at street level.

2.3.6   Demand for office floorspace in the environs of the Tower has continued to grow during the late 20th and early 21st centuries, as the City has strengthened its position as the world's leading international financial and business centre. The economic downturn from 2008 slowed the rate of change for a time, but, by 2012, development activity in prime areas of central London had largely recovered. While some earlier consents for tall office buildings in the City's eastern cluster are still being implemented, speculative office schemes around the Tower of London, and particularly to the north-east around Aldgate, are now being largely supplanted by residential, hotel and mixed uses. These are making a greater contribution to the vitality, variety and amenities of the environs of the Tower than the previous trend towards an office monoculture. The pressure for high buildings remains, however; indeed, is increasing again, reinforced by the attraction and market value of the views from the upper floors.

2.4   The character of the Tower in its setting

The existing character of the Tower WHS
2.4.1   The White Tower is the focus of the **Inner Ward**, dominating an intimate space, framed, particularly to the north, east and west, by historic buildings of diverse materials and styles, reflecting the long and complex history of the Tower. The areas south of the White Tower and much of Tower Green are laid to lawn, retaining some 19th century plane trees, relieving the hardness of the dominant cobbled paved areas.

2.4.2   Views from the Inner Ward, over and between its enclosing buildings and walls, illustrate the relationship of the Tower to the evolving, but primarily 20th century, cityscape beyond. Particularly from the northern parts of the Inner Ward, there are extensive prospects over the Thames to the south bank, now dominated by the striking 'spire' of Renzo Piano's 308m tall 'Shard of Glass', completed in the autumn of 2012. The modern, mostly commercial, buildings of the north bank are,

by contrast, seen primarily in framed views between or over the buildings defining the Inner Ward. Since 2014, the prospect to the west, over the Beauchamp Tower and 1-2 Tower Green, has been dominated by the upper part of 20 Fenchurch Street, a substantial new office building known as the 'Walkie Talkie' due to its curving shape. The view north-west, over the roof of the Church of St Peter ad Vincula, is increasingly dominated by the growing eastern cluster in the City, of which the Leadenhall Building known as the 'Cheesegrater' is the tallest, but which will soon be surpassed by taller new buildings.

2.4.3   The **Outer Ward** comprises a sequence of tightly-enclosed, largely hard-paved, spaces between the inner and outer concentric defensive walls. The Casemates behind the outer walls house many of the Tower's resident community. The essentially private character of these areas (except on the south) contrasts with the public spaces of the Inner Ward. Views of the city beyond the Tower are mostly limited to long views framed by the defensive walls, with the early 1970s Tower Guoman Hotel adjacent to the north-end of Tower Bridge, closing the eastward view along the southern side of the ward.

2.4.4   The **moat**, laid to grass in the mid-19th century, houses some recreational facilities for the Tower's resident community, as well as providing a venue for occasional public events such as the summer Music Festival and winter skating rink. In 2014, it held the WW1 commemorative art installation *'Blood Swept Lands and Seas of Red'*. The public gardens to the north-east of the moat, within the WHS, are regularly re-planted and maintained by Historic Royal Palaces.

2.4.5   The **Wharf** provides a Thames-side promenade for visitors, offering a panoramic view of the south bank. The largely stone-setted surface reflects its historic role, but its character is softened by London Plane trees along the edge of the moat. A number of the original trees have been removed.

Defining the setting of the Tower WHS
2.4.6   The concept of 'setting' relates primarily to the surroundings in which a place is perceived, experienced and understood. In the context of UK planning policy, the setting of a heritage asset has been defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve' (NPPF 2012). The setting of the Tower includes its relationship to historic features visible in the urban landscape, and its evolving visual relationships to that landscape, insofar as they contribute to, or detract from,

perceptions of its significance and, particularly, its OUV. The importance of setting is enhanced by the Tower's public accessibility and visibility.

2.4.7   The *wider setting* of the Tower comprises buildings and areas beyond the local setting that are inter-visible with the Tower, or which could (if redeveloped) have an effect on its setting. The wider setting is therefore not fixed, and is proportionate to the scale of development in the vicinity of the Tower - the taller the development, the further its visual impact will extend. The UK government has stated its belief that '...in the context of London, the wider setting is harder to define for World Heritage properties. The historical development of London is complex and dynamic to the extent that to define the wider setting [of a WHS] in a rigid mechanical framework would be counter-productive to the continued sustainable growth of the capital'[3]. Currently, no progress has been made with further defining the wider setting of the Tower in relation to its OUV and related protection measures, due to divergent views among the stakeholders.

2.4.8   The *local setting* of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose, or provide definition to, those spaces. This forms an 'arena', defined in figure 4 below, whose boundary is heavily influenced by views across the Thames.

2.4.9   The *immediate setting* of the Tower is that part of the local setting that is on the north bank of the Thames (as illustrated in figure 4 below).

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[3] Department for Culture Media and Sport, Tower of London WHS *State of Conservation Report* submitted to UNESCO World Heritage Centre, 31 January 2014

Figure 4: The local setting of the Tower
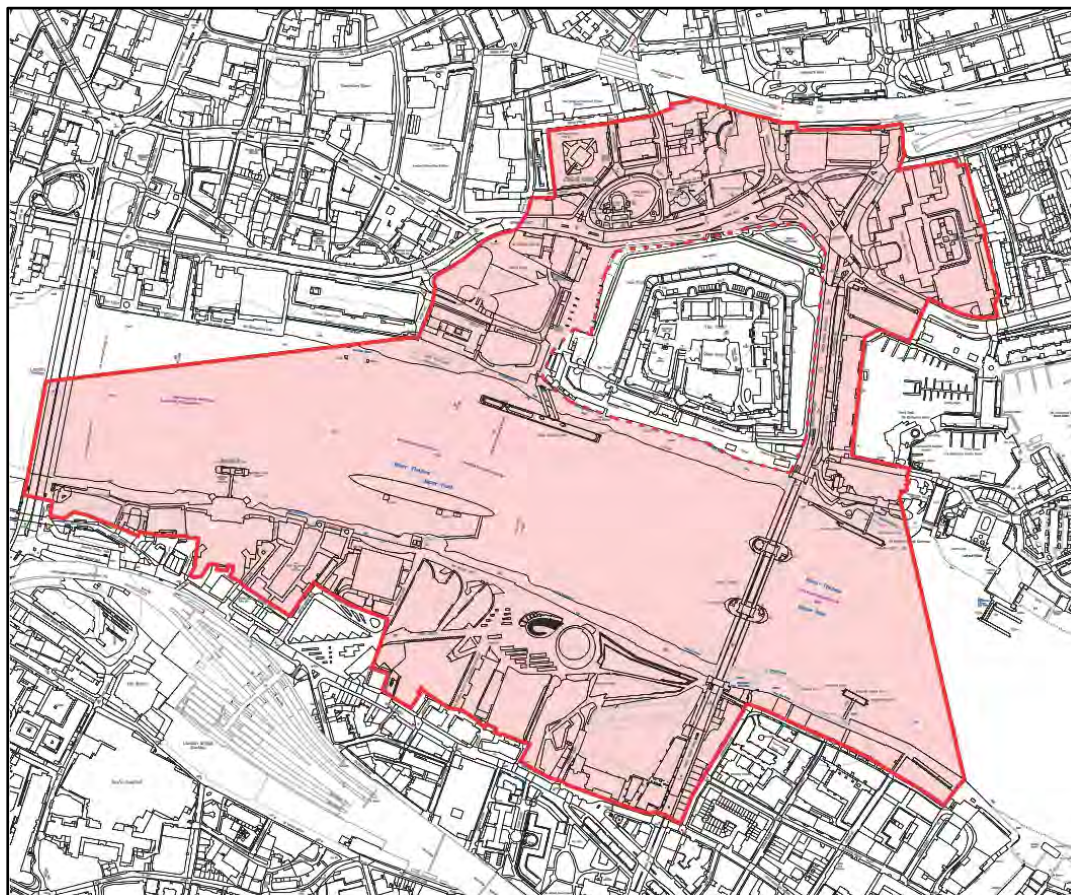
---- World Heritage Site Boundary

—— Local setting of the Tower

The local setting of the Tower

2.4.10   The Tower stands on the gently-rising north bank of the Thames, in the south-east angle of the Roman city wall, visible sections of which survive running northwards from the moat. The historic landward approaches from the City to Tower Hill are shown in figure 5 below and were:

- along Lower Thames Street, running directly towards the later Barbican;
- along Great Tower Street, the main route westwards through the late Saxon city from St Paul's Cathedral, aligned on the original entrance on the site of the Beauchamp Tower. This was and remains the 'ceremonial route' to and from the Tower.

2.4.11   In the opposite direction, Lower Thames Street frames the visual link with the Monument. Both these streets, and Cooper's Row to the north (3) and Mansell Street (4), provide medium to long distance, framed views of parts of the Tower.

Figure 5: Approaches to the Tower
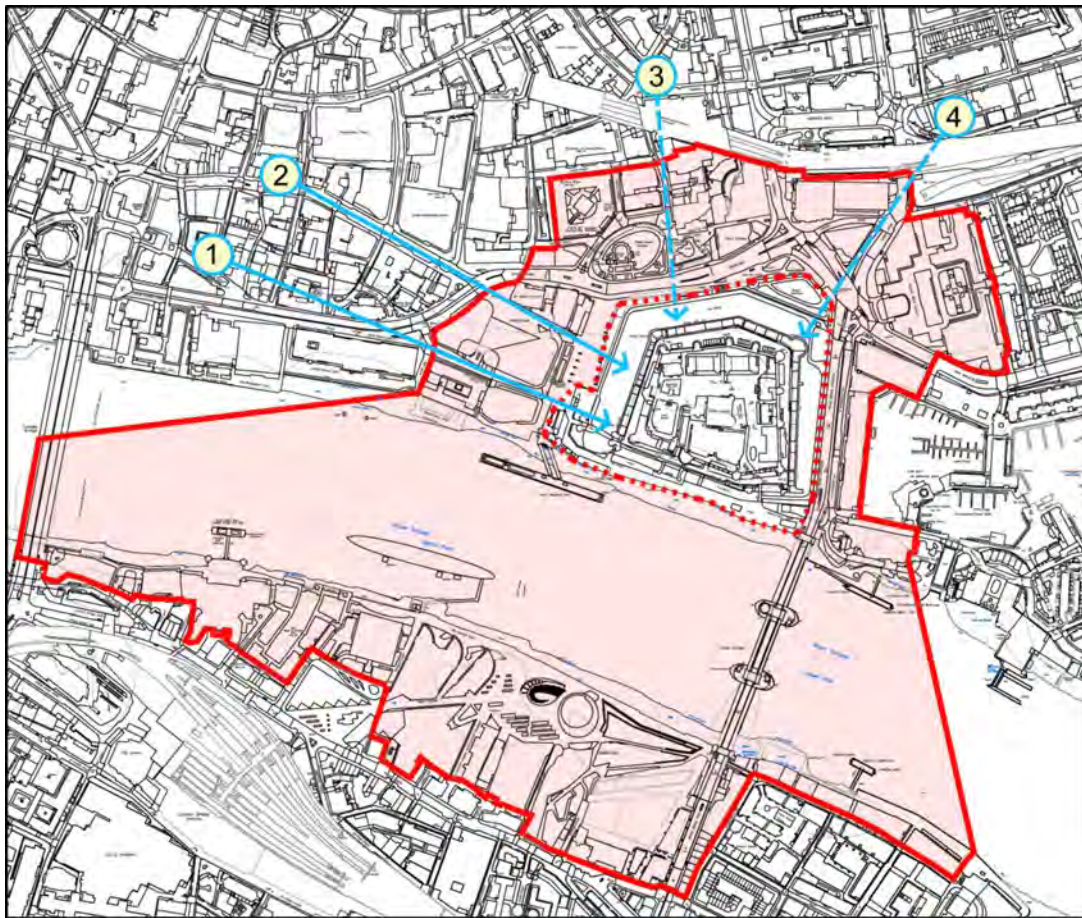
-----   World Heritage Site Boundary

———   Local setting of the Tower

⟶   Approaches to the Tower
  1. Lower Thames Street
  2. Great Tower Street
  3. Coopers Row
  4. Mansell Street

2.4.12   The character of the Liberties, the defensive open space around the Tower, began to change in the 1880s, with the construction of the new main roads along the north and east sides of the moat, the latter being the elevated northern approach to Tower Bridge. The A100, as further 'improved' in the mid-20th century to a heavily-engineered four lane road across the north side of the moat, visually dominates the area to the north of the Tower and forms a barrier to easy movement to and from the city beyond. To the west of the Tower, Tower Hill has been repaved as a major public space, and is now managed by Historic Royal Palaces with the Tower. Trinity Square, which includes the now redundant scaffold site, provides a contrast: it is an enclosed public garden of considerable amenity

value. The area immediately to the south of Tower Hill Underground Station includes an elevated viewing platform overlooking the Tower.

Figure 6: Local buildings
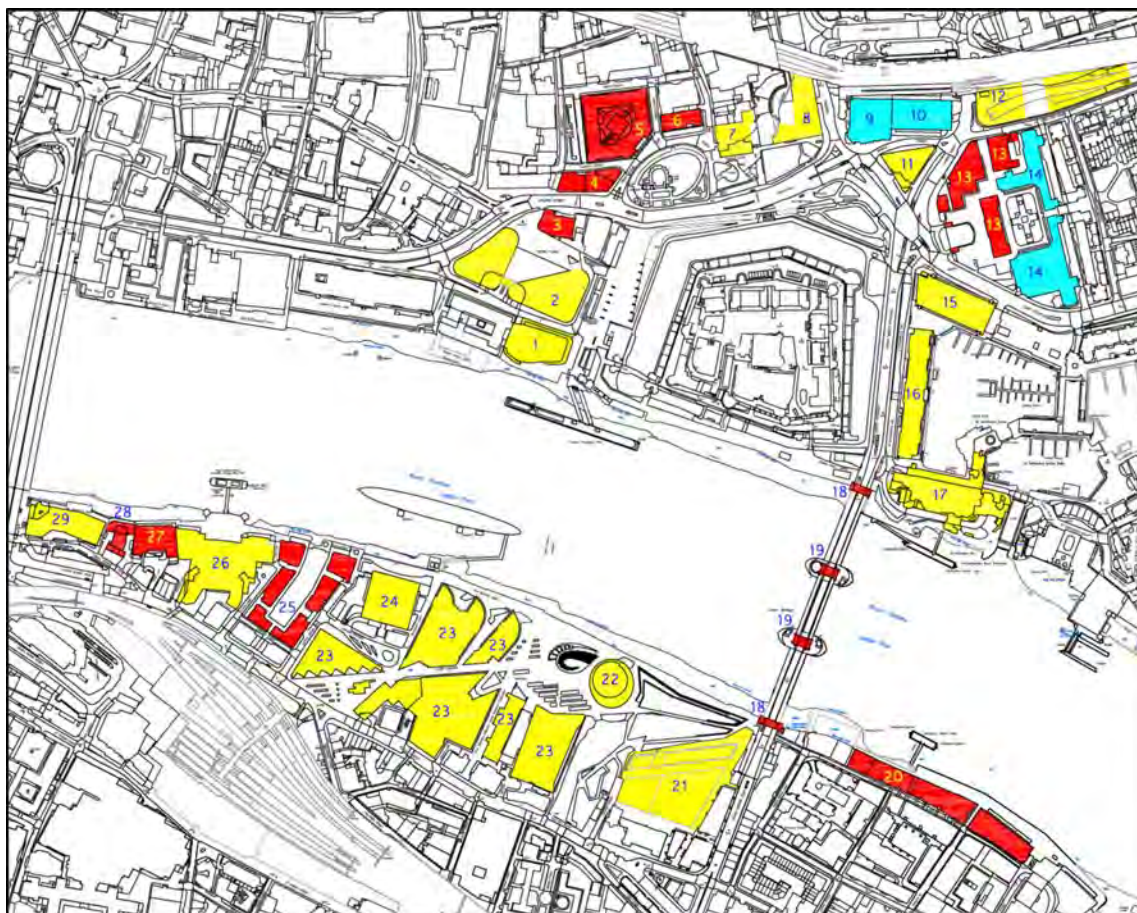
	Historic/ Listed buildings		Modern buildings (likely development sites in italics)		
3	All Hallows by the Tower	1	Cheval Three Quays Hotel	16	International House
4	Byward Street	2	Tower Place	17	Tower Guoman Hotel
5	10 Trinity Square (former Port of London Authority HQ), now Four Seasons Hotel	7	CitizenM Hotel	21	Potters Fields
		8	100 MInories Hotel	22	City Hall (GLA)
		9	*Société Générale*	23	More London
6	Trinity House HQ	10	*Minories Car Park*	24	Southwark Crown Court
13	Former Royal Mint	11	Sceptre Court	26	Cottons Centre
18	Tower Bridge Portals	12	Royal Mint Gardens (W block)	29	1 London Bridge
19	Tower Bridge Towers	14	*Royal Mint Court*		
20	Butlers Wharf	15	Tower Bridge House		
25	Hays Galleria				
27	London Bridge Hospital				
28	St Olaf House				

Figure 6 is for identification purposes only, and is intended to provide a reference point for the comments below.

2.4.13   The interface between the Liberties and the city, facing the Tower, became a favoured location for institutional buildings (see figure 6 above). The Royal Mint

moved out of the Tower in 1810 to a new building - now offices - to the north-east. The Corporation of Trinity House, responsible for the nation's sea lights, has its headquarters [6] to the north of the Tower. The Four Seasons Hotel [5] stands to the north-west, while on Trinity Square in front is Edwin Lutyens' Merchant Navy War Memorial, near the scaffold site. They are complemented by the surviving Edwardian commercial buildings in Byward Street [4], opposite All Hallows Church [3]. Otherwise, the space is defined by commercial buildings, mostly erected in the second half of the 20th century [7-10], differing greatly in form, scale and materials. Two of these have quite recently been re-developed: Tower Place [2] by Foster + Partners, and Tower Bridge House [15] by the (then) Richard Rogers Partnership.

2.4.14   The eastern aspect of the local setting is dominated by Tower Bridge and its approach [19], with International House, a late 20th-century office building [16], separating it from St Katherine's Dock. The south bank of the Thames was, until the late 20th century, lined with wharves and warehouses. Some of these, now converted to other uses [25, 27], survive in the Pool of London as reminders of the historic port which the Tower controlled for the Crown, as does Butler's Wharf [20] to the east of the Bridge.

2.4.15   The change of use of the southern river frontage facilitated the creation of a wide pedestrian riverside walk, Queen's Walk, along the south bank. Alongside it is City Hall [22], designed by Foster + Partners and completed in 2002, the seat of London government, addressing a paved public space on which pedestrian routes between commercial buildings [23] converge. This development, 'More London', also by Foster + Partners, was completed in 2012. To the east is Potters Field Park. Planning permission was granted in February 2006, following a public inquiry, for the development of the site to the south-east of the park [21] with residential towers, but this did not proceed. A more conventional mixed-use development by Squire & Partners has been constructed, which contributes positively to the setting of the Tower of London without vying for attention. To the west is Southwark Crown Court [24]. The local setting extends westwards as far as the southern part of London Bridge.

Experiencing the Tower in its local setting
2.4.16   The busy transport network around the Tower serves both commuters working in the local area and tourists visiting the Tower and the City. The key public transport destinations/points of entry are illustrated on figure 7.

Figure 7: Public transport destinations / points of entry
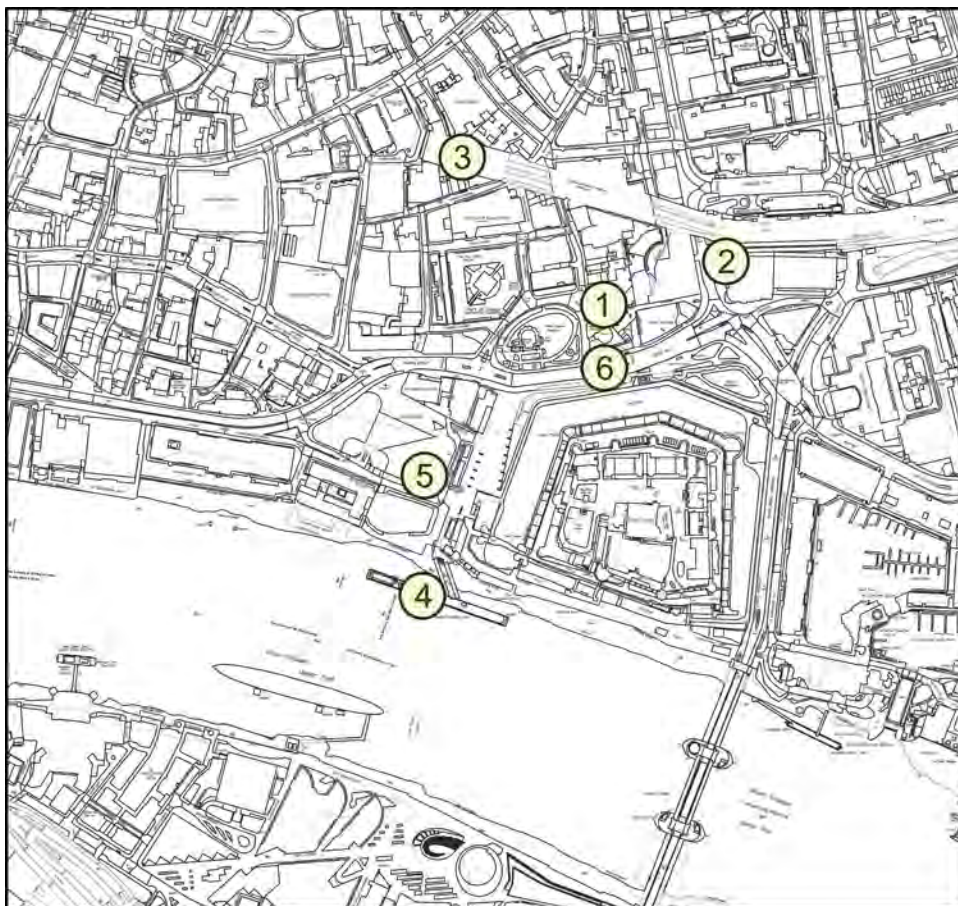
1.   Tower Hill Underground Station
2.   Tower Gateway Station (Docklands Light Railway)
3.   Fenchurch Street Station
4.   Tower Pier
5.   Tower Hill Coach and Car Park
6.   Bus set down / pick up points

2.4.17   Over half of the visitors to the Tower arrive at Tower Hill Underground Station[4], and gain their first glimpse of the Tower from there, or the adjacent Wakefield Garden viewing platform. To reach the Tower, they (and visitors arriving via Tower Gateway and Fenchurch Street) are confronted by steep steps down to an oppressively low subway under the A100 dual carriageway, which forms a barrier between the Tower and the city beyond. An alternative street-level route suitable for less able-bodied pedestrians is available via Trinity Square, where there is a pedestrian crossing which leads to the Tower Hill welcome centre, but this is not well signed and therefore not well-used. This route will become step-free when public realm improvements associated with the new CitizenM Hotel at 38-40 Trinity Square have been implemented[5]. Step-free access will also be provided from street

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[4] Historic Royal Palaces' visitor research conducted summer 2006.
[5] The scheme was granted consent at an appeal inquiry in 2013.

level to the lower-level entrance to the underground station, but not to subway level. Both the subway and the pedestrian crossing lead visitors to Tower Hill, now managed integrally with the WHS, where visitors are welcomed and can buy tickets to the Tower.

2.4.18   The local setting provides kinetic views of the Tower, revealing different aspects of its OUV and its relationship with the surrounding urban landscape. The Queen's Walk along the south bank provides an outstanding serial view of the Tower in relation to the modern City of London from a river-level pedestrian environment. A viewpoint immediately outside City Hall provides a panorama of the whole medieval fortress, centred on a diagonal view of the White Tower against a backdrop of clear sky. This is identified in the *London Plan* as a strategically important London view. Continuing northwards over Tower Bridge on the west pavement, the commercial centre of the City of London appears in the background, dominated by the tall buildings in the emerging 'Eastern Cluster', of which the 'Cheesegrater' is currently the tallest, and by 20 Fenchurch Street, between the cluster and the river. In addition to the existing buildings, consents have been granted and proposals are coming forward for more and taller buildings in the cluster area.

2.4.19   From the north-east, the Tower presents very much the character of an early modern artillery fortress, low and massive, not least because of the continuously elevated viewpoint provided by the northern approach to Tower Bridge. In contrast to Queen's Walk and Tower Hill, however, the public realm on the east and north is dominated by the noise and pollution of increasingly heavy traffic and the visual intrusion of highway signage. Transport for London is seeking to improve the quality of surfacing as part of the Cycle Superhighway 2016 and discussions continue around ensuring the creation of a streetscape that is appropriate to a WHS.

2.4.20   Buildings forming the boundary or enclosure of the local setting of the Tower influence people's experience of the Tower in two ways. First, they define the sequence of spaces which form that local setting, and so their quality contributes to perceptions of the quality of those spaces. Second, they form the immediate backdrop to the Tower (unless wholly obscured by it) in views of the WHS across the local setting, and are often seen at close quarters in views out from it, notably from the Inner Ward.

2.4.21   The upper walkway of Tower Bridge provides a relatively close-up aerial view of the Tower (and the upper chamber of the north tower, occasionally opened, an even better one), which graphically illustrates the layout and nature of the fortress. From 2013, a much higher viewpoint has been available from the public viewing gallery near the top of the 'Shard' on the south bank; and, from 2014, from the public viewing gallery in 20 Fenchurch Street, to the north-west of the Tower (see below). There is also a distant, oblique view of the Tower from the Monument, which the City of London Corporation planning policy has preserved.

2.4.22   The local setting of the Tower has been assessed in greater detail in the *Tower of London Local Setting Study* (2010) produced by Historic Royal Palaces – see paragraph 5.2.17 below.

The character of the wider setting of the Tower

2.4.23   The wider setting comprises buildings and areas beyond the local setting that are inter-visible with the Tower. Whether buildings and the sites on which they stand form part of the wider setting depends not only upon the extent to which they are visible in these views, but also upon the scale of any development or re-development proposed, and whether this would have an impact on the setting of the WHS.

2.4.24   The inter-visible wider setting of the WHS comprises a mix of historic and modern commercial buildings, mostly ranging up to about 10 storeys (30-40m) high, with residential and commercial buildings of varying heights predominating to the north-east. Since the 1960s, tall commercial buildings, particularly in the City of London, have become increasingly characteristic of parts of the wider setting of the Tower. There is strong and sustained interest in expanding both the number and the locations of such buildings, which are perceived as contributing to London's skyline and image as a dynamic 'World City', as well as to its economy.

2.4.25   To the north-west of the Tower stands the City of London's growing 'eastern cluster' of tall buildings, signifying its commercial centre. Its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London. This 'eastern cluster' forms the background to views of the Tower of London from the east, and the upper parts of these buildings are visible in views between and over buildings in the Inner Ward. To the west of the Tower, south of the 'eastern cluster', a tall, bulky new office building at 20 Fenchurch Street, designed by Rafael Viñoly, consent for which was

granted at public inquiry, was completed in 2014. Looking east, particularly from London Bridge, the growing group of tall buildings on the Isle of Dogs can be seen in the distant background of the Tower. To the south-west, there is a group of tall buildings around Guy's Hospital and London Bridge Station, where Renzo Piano's 306m high 'Shard of Glass' has replaced one of the existing blocks.

2.5   Current management

Ownership interests

2.5.1   The Tower of London is owned by the Crown, but is the responsibility of the Government through the Secretary of State for Culture, Media and Sport. The extent of this ownership encircles the moat, Tower Hill and the Victorian Gardens; a greater area than the boundaries of the WHS.

2.5.2   There is no substantive evidence of ownership within some areas within the environs of the Tower. In most cases, these are areas which have always been thoroughfares or open spaces, or they form part of the defensive space surrounding the Tower, known as The Liberties. Either these areas are not registered, or they are subject to a 'caution' issued by the Crown at HM Land Registry. The 'caution' identifies that The Crown Estate Commissioners registered an interest in the first title of the land, but does not necessarily indicate legal title.

2.5.3   The complex nature of previous development phases in the environs of the Tower is evident in the ownership pattern, particularly where sites have been acquired and cleared for highway purposes. Construction of Tower Bridge and the building of the A100 necessitated the demolition of property and the crossing of established ownership boundaries. Consequently, much of the land which is currently under highway, or was purchased to enable highway works, is in public ownership. However, various different authorities, departments and agencies have ownership interests in adjacent parcels of land and meet together to agree strategies for its management.

2.5.4   The complexity of ownerships is not confined to the land surface. At Tower Hill Station, there is a variety of public and trust ownerships of the surface, while Transport for London owns the underground parts of the station. At Tower Hill Terrace, Historic Royal Palaces owns part of the elevated surface, while there is a separate ownership of the vaults below.

2.5.5   In the buildings which surround the Tower, the owners comprise a combination of public institutions (including the Corporation of London, Guildhall University and the Corporation of Trinity House), financial institutions, developers and property investors, the Crown Estate Commissioners, and a variety of charitable trusts (including All Hallows Church Charitable Trust, the Tower Hill Trust and the Wakefield (Tower Hill Trinity Square) Trust.

2.5.6   The Port of London Authority owns and manages the River Thames to the high-water mark and owns the structure of Tower Pier. The Crown Marine Estates own Tower Wharf to the centre of the river between Tower Bridge and Tower Pier, and a stretch up river by the Custom House.

Management roles and responsibilities

2.5.7   Historic Royal Palaces is vested with responsibility for the care and maintenance of the Tower on behalf of the Crown. A non-departmental public body, it was established by Royal Charter on 1 April 1998 and has the status of a charitable trust. Historic Royal Palaces' responsibilities are set out in the Royal Charter and a formal contract with the Secretary of State for Culture, Media and Sport (see Appendix D). In summary, these are to care for, conserve and present to the public the unoccupied royal palaces.

2.5.8   In addition, the Royal Armouries, whose headquarters is in Leeds, retains a key part of its collection in the White Tower, where the armoury had its origins. The Royal Armouries is responsible for the presentation and interpretation of the interior of the White Tower.

2.5.9   Furthermore, the Regiment of the Royal Fusiliers has its regimental home and museum in the 'Fusiliers' building within the Inner Ward. Responsibility for the upkeep of this building remains with central government.

2.5.10   Overall, though, the responsibility for the WHS rests with a single organisation, Historic Royal Palaces, working in partnership with a variety of central, regional and local government, private sector communities and charitable stakeholders to best sustain the OUV, significance and public enjoyment of the WHS.

2.5.11   Historic Royal Palaces fulfils this responsibility for all the palaces in its care through a series of nested strategies, of which this Management Plan is one. The

strategies are driven by Historic Royal Palaces' *Cause*, to help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built. Three-year rolling strategic plans are developed to:

- give the palaces the care they deserve;
- help visitors explore their story;
- have greater impact in the world;
- develop an organisation that lives the cause;
- generate the money to make it all possible

2.5.12   This Plan will also guide Historic Royal Palaces' partnerships for the Tower and its actions in response to changes in the setting.

2.5.13   Historic Royal Palaces is led by an Executive Board, with a Chief Executive at its head. A Board of Trustees oversees the Executive Board and includes the Constable of the Tower of London, who is appointed by HM The Queen to be her representative at the Tower. Within the Executive Board, the Tower Group Director is responsible for the day-to-day running of the Tower and for the security of the Crown Jewels. The Conservation & Learning Director is responsible for the care of the fabric, the interpretation, presentation and education service, and is the 'owner' of this Plan.

2.5.14   Historic Royal Palaces retains a wide range of skills to help it fulfil its role. Conservation specialists, curators, educationalists, maintenance teams, fire, health and safety and security advisors, visitor service teams and support functions are all deployed at the Tower. Special to the Tower is the community of Yeoman Warders, who keep the traditions and form an integral part of any visit.

3.0 Statement of Outstanding Universal Value and Attributes

3.1 Introduction

3.1.1 World Heritage Sites, as internationally important sites of exceptional quality, should be managed to protect their Outstanding Universal Value (OUV). The way in which this is done is agreed by UNESCO's World Heritage Committee when a site is inscribed on the World Heritage List. The definition of a World Heritage Site's OUV is encapsulated in an agreed Statement of Outstanding Universal Value, and can only be changed by a formal decision of the World Heritage Committee.

3.1.2 It is the case now for all WHS that a Statement of Outstanding Universal Value (SOUV), including statements on the site's authenticity and integrity, is agreed by the Committee at the time of inscription. This was not always so in the past and the World Heritage Committee therefore asked for short SOUVs to be developed for all European WHS (including the Tower) which did not already have them.

3.1.3 Such an SOUV has to be based on what was presented to the Committee at the time of inscription and on any decision by the Committee. For the Tower, the two relevant documents are the Justification for Inscription contained in the State Party's Nomination Dossier and the formal evaluation of the site by the International Council on Monuments and Sites (ICOMOS), UNESCO's official adviser. These are contained in Appendix E of this Plan. The Committee's decision regarding inscription dated December 1988 regretted the building of the Tower (now Guoman) Hotel and commented on management issues, but not on the significance of the site, other than supporting the use of criteria (ii) and (iv) to justify inscription. A comprehensive, revised SOUV for the Tower was prepared in 2011 and agreed by the 37th session of the World Heritage Committee in June 2013: this is reproduced in full below.

3.1.4 Management plans for WHS should primarily set out structures to sustain their OUV. However, those responsible for WHS also need to manage other national and local values: these may be included in the Plan, but need to be carefully differentiated from other attributes that contribute to OUV and managed in a way that respects OUV. These further attributes may now be seen to contribute to OUV,

but they cannot be acknowledged without a re-submission to the World Heritage Committee. At the time of inscription, the State Party also suggested criterion (vi), but this was not accepted by the Committee. It is not therefore appropriate to include as part of the Statement of Significance intangible attributes which justify the use of that criterion and are not relevant for criteria (ii) and (iv).

3.1.5   This section is structured as follows:
- SOUV as revised and agreed by the World Heritage Committee in 2013. This includes a brief synthesis, justification for each of the inscription criteria, and statements on the Site's integrity and authenticity and on relevant protection measures.
- Draft attributes
- Associated attributes of national and local significances
- Instrumental benefits

Contemporary aerial view of the Tower.

3.2   Statement of Outstanding Universal Value 2011

3.2.1   The Statement of Outstanding Universal Value (SOUV) for the Tower of London was reviewed in 2011 as required by the World Heritage Committee and expanded to include statements on the Site's 'Authenticity' and 'Integrity' and the current 'Protection and Management Requirements' in place. This revised SOUV was submitted in February 2011 to the World Heritage Committee for approval, along with revised SOUVs for other UK WHS. The revised SOUV for the Tower of London was approved by the World Heritage Committee in June 2013, and is as set out below.

Statement of Outstanding Universal Value

Agreed at the 37th session of the World Heritage Committee held in Phnom Penh in June 2013.

Tower of London UK

Date of Inscription	1988
Approved Statement of Significance	2008
Date of Draft SOUV	2011

Brief Synthesis 2011

The Tower of London is an internationally famous monument and one of England's most iconic structures. William the Conqueror built the White Tower as a demonstration of Norman power, siting it strategically on the River Thames to act as both fortress and gateway to the capital: it is the most complete example of an 11th century fortress palace remaining in Europe. A rare survival of a continuously developing ensemble of royal buildings, from the 11th to 16th centuries, the Tower of London has become one of the symbols of royalty. It also fostered the development of several of England's major State institutions, incorporating such fundamental roles as the nation's defence, its record-keeping and its coinage. It has been the setting for key historical events in European history, including the execution of three English queens.

The Tower of London has Outstanding Universal Value for the following cultural qualities:

For both protection and control of the City of London, it has a landmark siting. As the gateway to the capital, the Tower was in effect the gateway to the new Norman kingdom. Sited strategically at a bend in the River Thames, it has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy. It had the dual role of providing protection for the City through its defensive structure and the provision of a garrison, and of also controlling the citizens by the same means. The Tower literally 'towered' over its surroundings until the 19th century.

The Tower of London was built as a demonstration and symbol of Norman power. The Tower represents more than any other structure the far-reaching significance of the mid-11th century Norman Conquest of England, for the impact it had on fostering closer ties with Europe, on English language and culture, and in creating one of the most powerful monarchies in Europe. The Tower has an iconic role as reflecting the last military conquest of England.

The property is an outstanding example of late 11th century innovative Norman military architecture. As the most complete survival of an 11th-century fortress palace remaining in Europe, the White Tower, and its later 13th and 14th century additions, belong to a series of edifices which were at the cutting edge of military building technology internationally. They represent the apogee of a type of sophisticated castle design, which originated in Normandy and spread through Norman lands to England and Wales.

The property is a model example of a medieval fortress palace, which evolved from the 11th to 16th centuries. The additions of Henry III and Edward I, and particularly the highly innovative development of the palace within the fortress, made the Tower into one of the most innovative and influential castle sites in Europe in the 13th and early 14th centuries, and much of their work survives. Palace buildings were added to the royal complex right up until the 16th century, although few now stand above ground. The survival of palace buildings at the Tower allows a rare glimpse into the life of a medieval monarch within their fortress walls. The Tower of London is a rare survival of a continuously developing ensemble of royal buildings, evolving from the 11th to the 16th centuries, and as such, has great significance nationally and internationally.

The property has strong associations with State Institutions. The continuous use of the Tower by successive monarchs fostered the development of several major State Institutions. These incorporated such fundamental roles as the nation's defence, its records, and its coinage. From the late 13th century, the Tower was a major repository for official documents, and precious goods owned by the Crown. The presence of the Crown Jewels, kept at the Tower since the 17th century, is a reminder of the fortress' role as a repository for the Royal Wardrobe.

As the setting for key historical events in European history: The Tower has been the setting for some of the most momentous events in European and British History. Its role as a stage upon which history has been enacted is one of the key elements which has contributed towards the Tower's status as an iconic structure. Arguably, the most important building of the Norman Conquest, the White Tower symbolised the might and longevity of the new order. The imprisonments in the Tower of Edward V and his younger brother in the 15th century, and then, in the 16th century, of four English queens, three of them executed on Tower Green – Anne Boleyn, Catherine Howard and Jane Grey – with only Elizabeth I escaping, shaped English history. The Tower also helped shape the story of the Reformation in England, as both Catholic and Protestant prisoners (those that survived) recorded their experiences and helped define the Tower as a place of torture and execution.

Criterion (ii): A monument symbolic of royal power since the time of William the Conqueror, the Tower of London has served as an outstanding model throughout the kingdom since the end of the 11th century. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.

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. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.

Criterion (iv): The White Tower is the example par excellence of the royal Norman castle from the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture.

Integrity 2011

All the key Norman and later buildings, surrounded by their defensive wall and moat, are within the Property boundary. There are few threats to the Property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded.

The Tower's landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave, all key aspects of its significance, have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription. Some of these have, to a degree, had an adverse impact on the views into, within and out of the property.

The Tower's physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such development could limit the ability to perceive the Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river.

Authenticity 2011

The role of the White Tower as a symbol of Norman power is evident in its massive masonry. It remains, with limited later change, as both an outstanding example of innovative Norman architecture and the most complete survival of a late 11th century fortress palace in Europe. Much of the work of Henry III and Edward I, whose additions made the Tower into a model example of a concentric medieval fortress in the 13th and early 14th centuries, survives. The Tower's association with the development of State institutions, although no longer evident in the physical fabric, is maintained through tradition, documentary records, interpretative material, and the presence of associated artefacts, for example, armour and weaponry displayed by the Royal Armouries. The Tower also retains its original relationship with the surrounding physical elements – the scaffold site, the Prisoners' or Water Gate, the dungeons — that provided the stage for key events in European history, even though the wider context, beyond the moat, has changed.

Its form, design and materials remain intact and legible as at the time of inscription, accepting the fact that extensive restoration had been undertaken during the 19th century by Anthony Salvin in a campaign to 're-medievalise' the fortress. The Tower is no longer in use as a fortress, but its fabric still clearly tells the story of the use and function of the monument over the centuries. The fabric also continues to demonstrate the traditions and techniques that were involved in its construction. The ability of the Tower to reflect its strategic siting and historic relationship to the City of London is vulnerable to proposals for development that do not respect its context and setting.

Protection and Management Requirements 2011
The UK Government protects World Heritage properties in England in two ways. Firstly, monuments, individual buildings and conservation areas are designated under the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990, and secondly, through the UK Spatial Planning system under the provisions of the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004. The property is protected as a scheduled ancient monument and buildings within it are protected as statutorily listed buildings.

Government guidance on protecting the historic environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents.

The Mayor's London Plan provides a strategic social, economic, transport and environmental framework for London and its future development over 20-25 years. It contains policies to protect and enhance the historic environment in general and World Heritage properties in particular. The London View Management Framework Supplementary Planning Guidance published by the Mayor protects important designated views, including a protected view of the Tower of London from the south bank of the River Thames. Locally, the Tower of London falls within the London Borough of Tower Hamlets and is adjoined by the City of London and the London Borough of Southwark. Each of these local planning authorities has an emerging Local Development Plan, which provide a framework of policies to protect and promote the Tower of London World Heritage property.

The Tower of London World Heritage Site Management Plan is reviewed regularly. Its implementation is integrated into the activities of Historic Royal Palaces, the independent charity responsible for caring for the Tower of London. The Tower of London World Heritage Site Consultative Committee, a group consisting of on-site partners, local authorities and heritage specialists, monitors implementation and review of the plan and provides a forum for consultation on issues affecting the Tower of London and its environs.

The most significant challenges to the property lie in managing the environs of the Tower of London so as to protect its Outstanding Universal Value and setting. At a strategic level, these challenges are recognised in the London Plan and the Boroughs' emerging Local Plans. These documents set out a strategic framework of policies aimed at conserving, protecting and enhancing the Outstanding Universal Value of the Tower and its setting. The challenges are also identified in the World Heritage Site Management Plan, which defines the local setting of the Tower and key views within and from it. Objectives in the Plan to address the challenges are being implemented (for example, through a local setting study that informed understanding of the immediate setting of the property, and through work on the property's attributes), although pressures remain significant, particularly in the wider setting. Discussions take place as part of the Management Plan review regarding how best to ensure continued protection of the Outstanding Universal Value of the property and its setting.

Other challenges include pressures on funding. However, Historic Royal Palaces has put in place robust measures to ensure that the Tower of London is properly protected, interpreted and conserved in accordance with its key charitable objectives. These measures include long-term conservation plans, prioritised and funded according to conservation needs, and cyclical maintenance plans. Plans for the visitor experience respond to the Historic Royal Palaces' Cause — to help everyone explore the stories of the palaces — and are subject to rigorous evaluation. All plans are regularly monitored and reviewed.

http://whc.unesco.org/en/list/488

3.3   Attributes of Outstanding Universal Value

3.3.1   The SOUV for the Tower of London World WHS sets out the cultural qualities that give the Site its international importance, based on which the World Heritage Committee has determined that the property has 'Outstanding Universal Value' (OUV). The property's 'attributes' are the features or relationships that express its OUV as identified in the agreed SOUV. Attributes are usually physical, but can also be processes or practices (such as traditions, or management regimes) that have an impact on physical qualities. *'Attributes are aspects of a property which are associated with or express the OUV. Attributes can be tangible or intangible.'*[6]

3.3.2   The attributes will be the focus of protection and management policies and institutional arrangements aimed at sustaining and, where appropriate, enhancing the property's OUV. They should underlie, for example, development management policies, as the basis for assessing the potential impact on the OUV of proposed changes or developments. They also provide a starting point for defining the need for ongoing management actions required to sustain OUV, and for monitoring the condition of the property. The 'authenticity' of a property is the link between the attributes and its OUV - the evaluation of authenticity indicates how well the attributes convey the OUV. Authenticity can be compromised if the attributes are weakened or eroded.

3.3.3   The *Operational Guidelines*[7] indicates that a range of generic types of attribute might be considered as conveying or expressing a property's OUV. These include: form and design; materials and substance; use and function; traditions, techniques and management systems; location and setting; language and other forms of intangible heritage; spirit and feeling; and other internal and external factors. This list is provided for guidance. It is essential, however, that the attributes identified derive from the property's SOUV. Historic England has advised that the first five types of attribute are most likely to be used in the UK.

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[6] UNESCO World Heritage Centre *Preparing World Heritage Nominations*, 2nd edition 2011, *Attributes and Features*, pp31-32
[7] UNESCO World Heritage Centre *Operational Guidelines for the Implementation of the World Heritage Convention* (July 2015)

3.4   Attributes of OUV of the Tower of London WHS

The different types of attributes that are considered to express the OUV of the Tower of London WHS are as follows.

3.4.1   *An internationally famous monument.*   The Tower has been symbolic of royalty and royal power since William the Conqueror and is one of England's most iconic structures. It represents more than any other building the far-reaching effect of the Norman conquest of England, and was emblematic of the might and longevity of the new dynasty. It has also been the setting for key events that changed the course of European history.

3.4.2   This attribute is expressed in the property's *form and design* and *use and function.*

3.4.3   The key *components* contributing to this attribute of the Tower's OUV are:
o   the iconic White Tower, its physical form and visual dominance;
o   the Tower's distinctive silhouette as seen in the world-famous view from the south bank of the Thames (LVMF protected view 25A.1-3). The property is internationally recognised and the silhouette of the White Tower has become an iconic image of London used in publicity by organisations such as Visit Britain;
o   the concentric defences around the White Tower as seen particularly in the semi-aerial view of the Tower from Tower Bridge, and now from the Shard;
o   the property's close relationship with the Thames, which provides its principal setting and the foreground in iconic views of the Tower from the south;
o   the Wharf and the historically-famous Water (or Traitor's) Gate, known world-wide from its depiction in literature and pictorial representations;
o   the historic traditions of the Tower, including the Yeoman Warders and the ravens, which are fundamental to its identity as a national icon.

3.4.4   *Landmark siting.*   The Tower was sited strategically to see and be seen along the Thames, both to protect and control the capital, and to act as a gateway to London and the kingdom from the river. Located within the south-east angle of the (still visible) Roman city wall, just above the Thames, key views along the river in both directions enabled the Tower to keep a watch over the main transport route and the potential approach of hostile forces. While no longer visible in long views

from the east, the strategic relationship of the Tower to the river, emphasised by the surviving medieval wharf and Water (Traitor's) Gate, remains clear, as does its relationship to the centre of the City, now marked by a growing cluster of tall buildings to the north-west. Although not within the tightly-drawn boundary of the property, the Liberties (the historically open, defensive space around the landward sides of the Tower) formed an important element of the Tower's defences when it was a fortress. The Liberties now make a significant contribution to the setting of the Tower, physically separating the site from the surrounding city.

3.4.5   This attribute is expressed in the property's *form and design*, its *use and function* and its *location and setting.*

3.4.6   The key *components* contributing to this attribute of the Tower's OUV are: the Tower's close physical relationship with the river, its proximity to the water, and siting on a bend to enhance its visibility both upstream and downstream;
   o   the visible elements and line of the Roman wall;
   o   the Tower's relationship to the City;
   o   the wharf/river wall;
   o   key views of the Tower up, down, across and from the river;
   o   the Tower's skyline (silhouette) as seen from the river and from across the river;
   o   the open quality of the Liberties (on the Tower's landward sides)

3.4.7   *Symbol of Norman power.*   The White Tower symbolises Norman power both in its massive masonry and its construction largely in imported Caen stone. The form and fabric of the White Tower is an outstanding example of Norman military and ceremonial architecture, crucial to the OUV of the site. A coherent, developed example of a form that had evolved incrementally in Normandy (notably at Ivry le Bataille), it is the example *par excellence* of an 11th century fortress palace. Its plan and three dimensional form survive substantially intact, despite late medieval and 17th century modification to the interior and the fenestration.

3.4.8   This attribute is expressed in the property's *form and design, materials and substance* and *use and function.*

3.4.9   The key *components* contributing to this attribute of the Tower's OUV are:
   o   the fabric of the White Tower, particularly the Caen and other types of stone

used in its construction;
- o its plan and three dimensional form;
- o its relationship to the adjacent foundations of the remains of the Roman land and river walls

3.4.10   *Physical dominance [of the White Tower].*   The White Tower expressed the power of the Norman conquerors through domination of its environs. Its dual role, of both protecting and providing a defence against the City, was evident: it literally 'towered' over its surroundings until the 19th century. Although this dominance has gradually been eroded as the scale of the surrounding city has subsequently grown, it can still be appreciated, especially where the Tower's silhouette can be seen against clear sky.

3.4.11   This attribute is expressed in the property's *form and design, materials and substance* and *location and setting.*

3.4.12   The key *components* contributing to this attribute of the Tower's OUV are:
- o the fabric and physical form of the White Tower;
- o its iconic silhouette against the sky from within its local setting, and particularly from the lower level viewpoints of the river itself and its south bank

3.4.13 *Concentric defences*   The concentric defences around the White Tower, which were constructed in the later 13th and 14th centuries, represent a model example of the development of a medieval fortress palace. The concentric defences of earthworks and walls added by Henry III and Edward I made it one of the most innovative and influential castles of its time in Europe. Although adapted, altered and restored through the centuries, the extant defences (including the remains of the barbican) are substantially medieval work. The open space of the Liberties, beyond the moat (which forms the immediate setting of the property), is related to its military role.

3.4.14   This attribute is expressed in the property's *form and design, materials and substance* and *use and function*.

3.4.15   The key components contributing to this attribute of the Tower's OUV are:
- o the visible structure and three-dimensional form of the concentric defences

(walls, including gates, towers and bulwarks; earthworks, including the moat and its retaining walls;

o   the remaining structure and form of the barbican;

o   buried archaeological remains of components superseded or altered

o   presence of the wall-walks and their visual linkage with the surrounding cityscape and river, which demonstrate use and function

3.4.16   *Surviving medieval remains.*   Buildings, structures and buried remains of the medieval and early modern palace survive. Within the defences, there are substantial parts of the ensemble of royal buildings that evolved from the 11th to the 16th centuries. They include not only domestic buildings, but some associated with the development of state institutions, including the Public Records, Ordnance, Royal Mint and the Wardrobe. The latter is the origin of the Tower as the home of the crown jewels.

3.4.17   This attribute is expressed in the property's *materials and substance;* and *use and function.*

3.4.18   The key components contributing to this attribute of the Tower's OUV are:

o   the surviving buildings, which, as well as the White Tower and towers and gates of the concentric defences, include the remains of early 13th century royal lodgings, and the Chapel of St Peter ad Vincula;

o   buried remains, particularly those of the medieval palace

o   tangible links with the state institutions established in the Tower, including Mint Street (between the inner and outer concentric defences) and the remains of the mint, and the Royal Armouries

3.4.19   *Physical [historical] associative evidence*.   Physical evidence of the imprisonment, torture and execution of prisoners, particularly that left by prisoners of conscience and opponents of the crown since the 15th century, provides tangible links with events that have influenced the course of English and European history, including the execution of three English queens. The site helped shape the story of the Reformation in England, as Catholic and Protestant prisoners recorded their names on the walls of cells and the survivors their experience of imprisonment and torture there. This role dominates the modern symbolism of the Tower.

3.4. 20   This attribute is expressed in the property's *use and function, traditions* and *spirit and feeling.*

3.4.21   The key components contributing to this attribute of the Tower's OUV are:
- the dungeons and cells, illustrating how historic prisoners were confined and tortured;
- the Royal execution site, depicted in many contexts and representations and associated, particularly, with the execution of Anne Boleyn;
- the Water (Traitor's) Gate, symbolically the gateway to incarceration and potential execution;
- historic graffiti left by prisoners, providing a unique record of their experiences;

3.4.22   It should be noted that, as mentioned above at the time of inscription, the State Party proposed criterion (vi), in addition to criteria (ii) and (iv), as justification for the Tower's inscription, but this was not accepted by the World Heritage Committee. Criterion (vi) requires a potential WHS property to "*be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, or with artistic and literary works of outstanding universal significance*" and the Committee considered that this requirement was not met at the Tower. Although reference is made in this Plan to the contribution made to the Tower's OUV by, for example, the traditions and myths associated with it, and how these need to be managed in a way that respects its OUV, such characteristics cannot formally be defined as 'attributes' without a re-submission to the World Heritage Committee.

3.5   Associated Attributes of national and local significance

3.5.1   In addition to the OUV the site has significances at national and local levels, which are summarised below.

The origins of an historic awareness of architecture
3.5.2   The period between 1825 and 1888 saw a radical transformation of the Tower site from a crammed complex of buildings from all periods, to an identifiable 'medieval' castle. The Tower is particularly significant in the development of an appreciation of the evolution of the Gothic style. Antiquarianism and renewed interest in medieval architectural styles coincided in the 19th century with a Romantic fascination for the Tower as a theatrical setting for some of the darker passages of English history. Anthony Salvin, one of the leading exponents of the Gothic Revival, was commissioned to restore the Beauchamp Tower in 1852. The project was so successful that Salvin was given responsibility for the whole Tower. In essence, Salvin 'restored' the buildings he worked on, most famously, the

Beauchamp, Salt, and Wakefield Towers to the appearance they were considered to have had originally. He also restored the fenestration of the Chapel windows in the White Tower, and remodelled the interior of the top floor (which was subsequently changed back in the 1960s). Salvin's restoration work was founded upon the principles of the authenticity of medieval building design, and provided a foundation for modern day archaeological appreciation of historic built structures. The Tower is a significant example of the effects of the Gothic Revival on surviving medieval architecture, and followed the acclaimed restorations undertaken by Salvin at Newark, Carisbrooke and Caernarvon Castles. Salvin was aware of the work of the great Gothic Revivalist Viollet-le-Duc and it is fair to say he shared Viollet-le-Duc's vision of the pre-eminence of medieval architectural forms. He was, like the Frenchman, a crucial Gothic Revivalist.

3.5.3   Salvin's and his successor, John Taylor's, approach was strongly dictated by a 19th century idea of what a medieval castle should look like. Taylor prompted one of the earliest recorded debates about the conservation of historic buildings by demolishing the Record Office next to the Wakefield Tower. The Society for the Protection of Ancient Buildings (SPAB) bitterly opposed Taylor's 'recreation' of a mythical medieval structure, preferring the integrity of genuine architectural survivals. The mythology of the Tower as an imposing, 'Gothic' fortress proved very strong, and had a profound effect on the fabric of the buildings.

A centre of national spectacle and ceremonial

3.5.4   From at least the early 14th century, the Tower was the traditional starting point for the Coronation procession of a significant number of medieval and Tudor monarchs. There are many records of the extraordinary magnificence of these celebrations. The now discontinued initiation of the Knights of the Order of the Bath is an important part of the history of coronation processions from the Tower. The Knights took ritual baths prior to keeping an all-night vigil in St John the Evangelist's chapel in the White Tower, on the eve of a coronation. In the morning, they were created Knights, and then escorted the sovereign in the coronation procession from the Tower to Westminster. Henry IV initiated the custom, and Charles II was the last to perform it, in 1661.

3.5.5   A few choice, smaller scale ceremonies are still carried out at the Tower. The forms of the ceremonies date from the 19th century, but their origins are often much older. These include the purportedly 700-year-old Ceremony of the Keys, and the relatively modern Ceremony of the Lilies and Roses to commemorate the death

of Henry VI. The Tower is one of the oldest gun salute stations in the country, the earliest recorded salutes being for the coronation of Anne Boleyn in 1533. Gun salutes are still fired from the Tower on many important occasions, such as The Queen's birthdays and the State Opening of Parliament. The continuity of these ceremonies at the Tower adds to its importance as a touchstone, over the centuries, for ritual and national celebration.

Traditions of the Tower

3.5.6   The traditions of the Tower are fundamental components of its identity as a national icon. The Yeomen Warders, popularly known as Beefeaters, have become inseparably linked with perceptions of the Tower. The Yeomen Warders were originally part of the royal bodyguard, and now chiefly perform duties connected with ceremonials, security, and with guiding the many visitors to the Tower. The ravens have their place in the mythology of the Tower and are protected by the legend that the Tower and kingdom will fall should they ever leave.

Chief Yeoman Warder and Yeoman Gaoler

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The tradition of the Tower as a visitor attraction by prior appointment has its roots in the 16th century. The 19th century saw the introduction of a ticket office at the Tower. Visitor attractions included the Armouries, the Menagerie, the Jewel House and, until the Interregnum, the institution of the Great Wardrobe, of which the Jewel House was an offshoot. The Armouries have great significance as they form the earliest museum display in the country, with historic armour being displayed from the late 16th century onwards. The Royal Menagerie was originally for the entertainment of the monarch, but, by Elizabeth I's reign had become a public attraction. The Menagerie formed the basis of London Zoo, and eventually left the Tower in 1831-2. State regalia and precious items were displayed to visitors from the early 16th century onwards, and the Coronation regalia joined them at the Tower

after the Restoration. The Crown Jewels were displayed in many different buildings around the Tower, before finally being installed in the current Jewel House in the Waterloo Barracks. Their resonant presence adds to the status of the Tower as national icon.

The artistic response to the Tower

3.5.7   William Shakespeare, another national icon of international significance, incorporated the Tower into a number of his plays. He used the Tower as a backdrop to his history plays, revolving around the Wars of the Roses. Most notably, in Richard II, where the White Tower is referred to as 'Julius Caesar's Tower', in Richard III, where the Duke of Clarence is drowned in a butt of Malmsey, and in Henry VI.

3.5.8   Pictorial artistic representations of the Tower range from the topographical to the romantically fanciful. The Tower has been represented in image form since medieval times, appearing as a schematic representation of a castle building. The first known non-schematic representation appeared in a late 15th-century book of poems by Charles, Duke of Orleans, illustrating his time as a prisoner there. Topographic artists such as the 16th-century Wyngaerde, and Hollar of the 17th century portrayed the Tower in drawings and engravings. This tradition continued into the 19th century with draughtsmen and artists from the Ordnance Drawing Room, such as Paul Sandby, making a contribution. As well as appearing as the central architectural image, the Tower often formed the evocative backdrop to scenes of daily London life on the river and in its environs. The fire of the Grand Storehouse in 1841 provided an opportunity for dramatic representations. J.M.W. Turner was amongst the artists who chose to represent the conflagration. The Tower was also depicted in portraits of high status ex-prisoners, or of those who had commanded the Tower. As the late 18th and 19th century progressed, the Romantic interest in the mythology of the history of the Tower manifested itself in paintings depicting the more notorious events which took place there. Millais' 'Princes in the Tower' and Delaroche's 'Execution of Lady Jane Grey' are two such examples. W. Harrison Ainsworth's influential novel about the Tower is also of this school. In the present day, the Tower features strongly in the historical novels by Hilary Mantel, 'Wolf Hall' and 'Bring up the Bodies', about the life of Thomas Cromwell. The life of the Tower as a visitor attraction and site of state institutions found both humorous and serious expression in the art of Thomas Rowlandson, amongst others, in the early 19th century. The Tower has proved a constant presence on the art historical skyline of the capital, with the view from the River

proving the most popular.

Symbol of the punitive power of the monarchy

3.5.9   Another institution developed at the Tower was the State Prison. This role began in 1100 with Bishop Flambard and reached its apogee in the Tudor period.

Costumed interpretation of Colonel Blood and the great Crown Jewels robbery

© Historic Royal Palaces

However, the Tower remained the prison of first choice for political prisoners and those accused of crimes against the state, particularly during periods of civil or national unrest. Parliamentarians, Jacobites and early 19th century radicals were incarcerated here, in part at least because of the Tower's reputation and image as the ultimate stronghold. Even in the 20th century, German prisoners spent time at the Tower, and some were executed as spies. Along with the imposing fortress architecture of the Tower, its use as a prison and occasional place of torture and execution helped to instil a sense of the punitive power of the Monarchy or the State in their subjects. Indeed, the popular image of the Tower as a bloody place of terror is long-established, although the more detailed 'romanticised' image of dripping dungeons is largely an invention of Victorian fiction. Medieval monarchs certainly encouraged the idea that the Tower was a place of strength to be feared, and this added to a sense of the monarchy being unyielding and despotic. For example, the Benedictine monk Matthew Paris tells us that the citizens of London rejoiced when Henry III's imposing West Gate collapsed, for they identified the fortified structure with their possible incarceration and disappearance. The Barons of the realm refused to meet King Henry at the Tower, for fear of being imprisoned within its walls.

Commemorative

3.5.10   Whilst tales of torture, execution and imprisonment at the Tower have been exaggerated to dramatic effect over the centuries, the fact remains that numerous people have suffered within its walls. Men and women of religious conviction were incarcerated, in some cases for large periods of their lives. Some were tortured at the Tower, and a handful was executed on Tower Green. A much greater proportion was executed on Tower Hill. Prisoners of conscience, such as Sir Thomas More, and victims of conspiracy and the changing tides of historical fortune, such as Anne Boleyn and Lady Jane Grey, deserve remembrance. The inscription-covered rooms in the Beauchamp and Salt towers, the Tower Green scaffold site, and the burial place in front of the altar in St Peter ad Vincula all contribute towards a sense of the Tower serving as a memorial for the persecuted, the imprisoned and the executed.
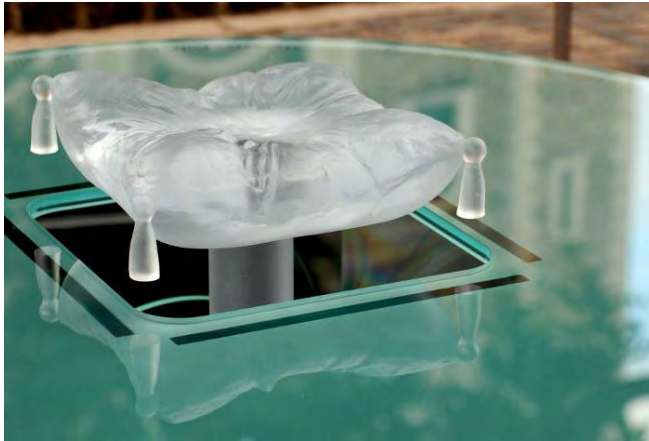
The glass pillow, by British artist Brian Catling, is a memorial to ten people whose executions are associated with Tower Green.

© Historic Royal Palaces

Living, working community

3.5.11   The Tower has traditionally been, and remains, a living and working community, currently comprising the Constable of the Tower, Resident Governor and Tower Officers, the Yeoman Warders and their families, a resident chaplain and doctor, plus a small, but significant, raven population. It houses the headquarters of the Royal Regiment of Fusiliers and the Royal Armouries. The Royal Regiment of Fusiliers was founded in 1968 following the amalgamation of a number of former regiments including the Royal Fusiliers (City of London Regiment), which was founded in 1685 to protect the royal guns within the Tower. There is a strong historical association between the Royal Regiment of Fusiliers and the Tower. The Regimental Museum, managed by the Regiment and open to visitors, is located on the site. Accommodation is also provided for the military guard which is responsible for the protection of the Crown Jewels and ceremonial duties. In

addition, the Tower houses the Chapels Royal with their tradition of worship and music.

3.5.12   This community sustains the intangible history of the Tower. The Constable of the Tower is an office dating back to 1066 in an almost unbroken line. Appointed by the Sovereign, his role is mainly ceremonial, although he is now also a Trustee of Historic Royal Palaces. Key members of the Tower management, including the Governor and Deputy Governor, are also 'Tower Officers', filling ancient appointments as well as Historic Royal Palaces' full time posts, and are residents of the Tower.

3.6   Instrumental benefits

3.6.1   In addition to the cultural heritage values discussed above, the Tower is of considerable instrumental benefit to the local economy and community. Over the centuries, the Tower's 'brand' has become synonymous with the history of the City and Tower Hamlets: in name, for example, Tower Hamlets, Tower Bridge, Tower Hill, Great Tower Street, Tower Pier; as a place of private and public executions (Tower of London and Tower Hill respectively). Businesses in the area that benefit from the Tower's visitors include shops, restaurants and the transport network. Other instrumental benefits include the pedestrianisation of Tower Hill, and a Welcome Centre to help promote the Tower to tourists in the area.

3.6.2   The Tower has a part to play in regeneration of the wider community. Its successful management will provide significant economic, social and environmental benefits. The Tower's local community is well-served by Historic Royal Palaces' Learning & Engagement team, who engage a variety of local formal, family, youth and adults audiences through a comprehensive range of programming to help them access the Tower's unique spaces and stories.

4.0 Overview of UK Planning and Policy Framework

4.1 Introduction and overview

4.1.1   The UK's system of heritage protection is substantially integrated with the land use and spatial planning system. The protection of cultural World Heritage Sites in the UK is achieved primarily through statutory designations and the statutory planning system operated by individual local planning authorities. This has two principal components:

- the legal designation at national level of sites of archaeological interest (scheduled monuments) and buildings of architectural or historic interest (listed buildings). It is an offence to undertake most works to designated sites or buildings without first obtaining specific consent. At local level, areas of special architectural or historic interest can be designated as conservation areas.

- a 'plan-led' development management system operated by local authorities, under which specific permission is required for 'development' (which includes new building, external alterations to buildings, and changes of use). Local planning authorities consider such applications for planning permission in the context of their local plans and policies for protecting the historic environment.

National Planning Policy Framework

4.1.2   The government's objectives for the protection of WHS and the principles that underpin them are set out in the *National Planning Policy Framework* 2012 (NPPF) and the *Planning Practice Guidance* 2014 (PPG). Together, these provide the over-arching framework within which local planning authorities must determine applications for planning permission and for listed building consent under the *Planning (Listed Buildings and Conservation Areas) Act* 1990.

4.1.3   The central principle of the NPPF is that there should be 'a presumption in favour of sustainable development' (paragraph 14). One of the three dimensions of sustainable development is environmental and this includes 'protecting and enhancing ... the built and historic environment' (paragraph 7). The NPPF also states that planning should 'conserve heritage assets in a manner appropriate to

their significance' (paragraph 17). In order to achieve this, their 'significance', or heritage interest, must be understood at the outset. NPPF policies for the historic built environment refer to 'designated' and 'undesignated' heritage assets. WHS are defined as 'designated heritage assets of the highest significance', to which substantial harm or loss of heritage significance 'should be wholly exceptional' (paragraph 132).

4.1.4   The PPG includes 'Further Guidance on World Heritage Sites' (paragraphs 28-30[8]) and sets out the key principles that local planning authorities need to take into account when developing local plan policies to protect and enhance WHS, as follows:

- protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone
- protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site and its setting where appropriate and possible through positive management
- protecting the World Heritage Site from climate change, but ensuring that mitigation and adaptation is not at the expense of integrity or authenticity

4.1.5   The PPG also places importance on protecting the settings of WHS in line with the UNESCO *Operational Guidelines*, particularly through the protection of specific views and viewpoints. Such protection is effected through regional and local planning policies: in the case of the Tower of London, the Mayor's current *London Plan* and the local plans of each of the responsible local planning authorities, the City of London, and the London Boroughs of Southwark and Tower Hamlets.

4.1.6   The Tower of London WHS is situated in the London Borough of Tower

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[8]http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/how-do-heritage-assets-become-designated/further-guidance-on-world-heritage-sites/

Hamlets, to which applications for development must be made. Tower Hamlets and the adjacent local authorities, the London Borough of Southwark and the City of London, manage development in much of the WHS's setting.

4.1.7   Government policy for spatial planning, including the protection of WHS, is currently overseen by the Secretary of State for Communities and Local Government (DCLG). The Department for Culture, Media and Sport (DCMS) leads on cultural issues and World Heritage policy, and acts as the 'State Party' representing the UK Government on the implementation of the Convention. Historic England is the Government's statutory adviser on the historic environment, through consultation and policy implementation, and through their responsibilities for statutory listing, scheduling and the scheduled monument consent regime.

Scheduled monuments

4.1.8   Scheduled monuments (SMs) are monuments and sites included on a Schedule compiled by the Secretary of State (DCMS) under the Ancient Monuments and Archaeological Areas Act 1979. Inclusion on the Schedule recognises the national importance of such monuments and gives them statutory protection. They must satisfy all eight of the Secretary of State (DCMS)'s scheduling criteria in the strongest way: Period, Rarity, Documentation, Group Value (with, in the case of the Tower, the adjoining Tower Hill West SM and also the component parts of the Tower itself), Survival/Condition, Fragility/Vulnerability, Diversity and Potential.

4.1.9   Under the provisions of the 1979 Act, works affecting scheduled monuments require scheduled monument consent (SMC) from the Secretary of State (DCMS). Historic England advises the Secretary of State (DCMS) on their management and on applications for consent, and is responsible for inspecting the monuments and reporting on their physical condition.

4.1.10   The whole of the Tower of London WHS is designated as a scheduled monument and this provides the primary protection for the WHS. Almost all works to the fabric require scheduled monument consent from the Secretary of State (DCMS), advised by Historic England. The scheduled monument consent regime remains wholly separate from the locally-managed development planning process. Most of the buildings and structures within the Tower WHS are also listed, but the statutory procedure for authorising works to monuments takes precedence over listed building consent.

4.1.11   Some elements within the local setting of the Tower are also scheduled (including Tower Hill). The *Scheduled Monuments* policy statement (DCMS, October 2013) sets out current government policies in relation to archaeological sites.

Listed buildings

4.1.12   Listed buildings are buildings and structures included on the National Heritage List for England for their special architectural or historic interest: the list is compiled by the Secretary of State (DCMS). Listed buildings have statutory protection and are classified by grades (grades I, II* and II) according to their relative significance. Many buildings and structures within the Tower of London are statutorily listed in their own right, as are various buildings in the adjoining area. Most works (other than like-for-like repairs) to listed buildings (other than those also designated as scheduled monuments) require listed building consent (LBC) in addition to planning permission, where the works affect the building's special architectural or historic interest.

Conservation areas

4.1.13   Conservation areas (CAs) are 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'[9]. The designation and management of CAs is the responsibility of the relevant local planning authority. Designation as a CA recognises the importance of groups of historic buildings and their settings ('townscape') as important assets of our cultural heritage which should be conserved for future generations. The entire Tower WHS lies within the London Borough of Tower Hamlets' Tower of London Conservation Area. There are several other CAs in the vicinity of the Tower, as indicated on figure 8 below, which include substantial parts of its local setting.

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[9] As set out in the Planning (Listed Building and Conservation Areas) Act 1990

Figure 8: Conservation Areas

1. The Tower (LBTH) 2. Trinity Square (City) 3. Crescent (City) 4. Fenchurch Street (City) 5. Lloyds Avenue (City 6. Eastcheap (City) 7. Leadenhall Market (City)	8. Bank (City) 9. Tower Bridge (LBS) 10. St. Saviours Dock (LBS) 11. Tooley Street (LBS) 12. Borough High Street (LBS) 13. Bermondsey Street (LBS)	City of London – **City** London Borough of Southwark – **LBS** London Borough of Tower Hamlets - **LBTH**

4.1.14   Conservation area appraisals are required for CAs. These describe the architectural and historic character and significance of each area that justifies its designation, and provide guidance to all concerned with development and change in the area on how its character and appearance can be preserved and enhanced. A list of such appraisals for the CAs in the vicinity of the Tower and their status in each authority's local policy framework is attached at Appendix B.

WHS Management Plans

4.1.15   WHS Management Plans are not part of the local development planning framework, but local planning authorities in the UK are expected to take relevant

policies in WHS management plans into account in developing their strategy for the historic environment and in determining relevant planning applications.[10]

4.1.16   The UNESCO *Operational Guidelines* provide detailed advice on the preparation of WHS management plans. The Historic England guidance note *The Protection and Management of World Heritage Sites in England* (2009) also includes guidance on preparing WHS management plans, at Section 9. It was prepared to support the now withdrawn Circular 07/2009, but remains available on Historic England's website, as non-statutory guidance.

4.1.17   In summary, statutory controls, applied through the NPPF and *Local* and *Neighbourhood Development Plans*[11], provide a potentially robust framework for managing change and development within the Tower of London WHS and its setting. Although the Tower itself is managed by an independent organisation charged with its preservation, statutory controls over its fabric ensure that Historic Royal Palaces' proposals are subject to public and expert scrutiny, and provide the means by which the setting of the Tower can be managed to avoid harm to its OUV. *The key local planning policies relevant to the Tower WHS, current at the time of writing, are set out at Appendix B.*

Role of the Management Plan

4.1.18   A consensual and coherent planning framework for the preservation and enhancement of the Tower and its setting is needed to ensure a consistent and cohesive approach by all involved. This Plan seeks to relate current and emerging policy and guidance relevant to sustaining the OUV of the Tower and its setting to the issues that affect the future of the Tower, particularly its vulnerability to the effects of major change to its setting. It indicates how those policies should be applied and interpreted in order to achieve the common objective of preserving and enhancing the setting of the Tower WHS, reflecting the role envisaged for WHS Management Plans. The PPG and the Mayor's London Plan and Supplementary Planning Guidance on the setting of London WHS all underline the importance attached to the preparation of the Plan and the fundamental role of local planning authorities in ensuring protection and enhancement of the WHS and its setting.

4.1.19   The number of tiers of government and organisations involved in managing the setting of the Tower, and the increasing number of policy and advisory

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[10] PPG, 'What are World Heritage Site management plans?' (2014)
[11] See Appendix B for description of Neighbourhood Development Plans

documents produced by them, as well as the aspirations of landowners and developers, makes it essential to maintain and develop the co-ordination and co-operation which was begun through the process of finalising the previous version of this Plan.

Notifications

4.1.20   A formal requirement for notifying Historic Royal Palaces of certain planning applications affecting the local setting of the Tower is in place under a Direction made by the Secretary of State DCLG in March 2012[12] regarding the Mayor's London View Management Framework (LVMF) Supplementary Planning Document. This Direction requires Historic Royal Palaces (and others, including Historic England) to be notified of proposals within the foreground and background of a designated viewing corridor north from City Hall towards the Tower of London (LVMF Protected Vista 25A.1).

Applications for development in the wider setting

4.1.21   The World Heritage Committee Decision 36 COM 76.91, following the December 2011 reactive monitoring mission to the Tower, 'encourages the State Party to implement its recommendations, including to, 'further define the immediate and wider setting of the property in relation to its Outstanding Universal Value and embed these in the policies of all relevant planning authorities'. While the immediate or local setting is already defined in this Plan and its predecessor, any progress towards defining the wider setting geographically or using 3-dimensional technology (and so providing a rationale for adjusting the notification requirements) has not been accepted by the Mayor of London and some boroughs, because of concern that such definition would be perceived as potentially inhibiting major developments.

4.1.22   In order for their likely effect on the OUV of the WHS to be assessed, planning applications for development proposals that would materially affect the Tower or its setting should describe fully and accurately the potential impacts of those proposals and include design and access statements, Accurate Visual Representations (AVRs) and other illustrative material. Applications that have an effect on the 'Townscape View' of the Tower from City Hall should have regard to the Management Plan for that view in the LVMF; any application that falls within this view should be subject to the process of visual assessment as outlined in the

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[12] Under Articles 16(4) and 39 of the Town and Country Planning (Development Management Procedure) Order 2010

LVMF. Chapter 3 of the LVMF provides guidance on visual assessment and the scoping process for agreeing appropriate AVRs with local planning authorities.

Tower of London from Queen's Walk, in its wider setting

© Historic Royal Palaces 2015

4.1.23   The process of preparing AVRs for development proposals should reflect those advances in digital technology appropriate to the form of development, subject to reasonable cost considerations and the requirements of professional judgement. Appendix C of the LVMF provides information about the use of AVRs and the information applicants and their consultants are required to provide about their production.

4.1.24   It is recognised that local planning authorities have to consider a number of different issues when making a balanced assessment of development proposals. In addition to the Mayor's LVMF, Historic England's *Seeing the History in the View* (May 2011), currently being reviewed, provides detailed guidance and a methodology for assessing the impact of development on views in the historic environment.

4.1.25   The PPG (see Further Guidance on WHS: Paragraph 036) and UNESCO's Operational Guidelines (see paragraphs 110 and 111(c)) both now include a requirement for Heritage Impact Assessments to be undertaken for major development proposals in the setting of the Tower of London. The assessment should include evaluation of the potential effect or impact of the proposal on the OUV of the WHS and its setting. This can normally be addressed within the context of the Environmental Impact Assessment (EIA) which will usually be required for such proposals.

4.1.26   Best practice, now followed by most developers in line with guidance in the NPPF (paragraphs 88-95) and PPG (Further Guidance on WHS: Paragraph 037), is to involve Historic England and Historic Royal Palaces in pre-application discussions and, in collaboration with the local planning authority, to provide full details at the point of formal consultation, following submission of the application. Historic England has produced updated guidance on both setting[13] and tall buildings[14]

4.1.24   Specifically in relation to the protected viewing corridor from City Hall, as a consultee under the Secretary of State's Direction, Historic Royal Palaces should be consulted in accordance with the guidelines in the LVMF, which promotes early consultation with representatives of the relevant planning authority, consultees, and other decision makers; and consultation with those parties through all stages of the planning application up to decision. Such consultation is becoming usual (although not universal) for all proposals having a material effect on the setting of the WHS, not only those affecting the protected view.

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[13] Historic England (2014) *Good Practice Advice Note: The Setting of Heritage Assets* (GPA3)
[14] Historic England (2015) *Tall Buildings*

5.0   Progress since the last Management Plan 2007

5.1   Introduction

5.1.1   Before highlighting the opportunities, challenges and issues currently faced and setting the aims and objectives for the next five years, it is worth noting some of the key achievements that have been made against the objectives set in the previous management plan.

5.2   Progress

Conservation projects

5.2.1   Since 2007 Historic Royal Palaces has undertaken a series of significant conservation projects and programmes across the Tower site, meeting an ongoing objective to conserve the buildings and collections in accordance with best practice.

5.2.2   Major projects have been undertaken to enable significant fabric repairs, conservation and reconstruction. These have included the representation of the Jewel House, the opening of a new area of the Tower for the Mint Street Exhibition ('Coins and Kings'), the representation of the Chapel of St Peter Ad Vincula, the building of a new Café on the Wharf (including repairs and conservation to areas of the vaults below Tower Bridge), and the reconstruction of both the Middle Drawbridge and the White Tower Steps in English Oak.

Reconstructed Middle Drawbridge

© Historic Royal Palaces 2015
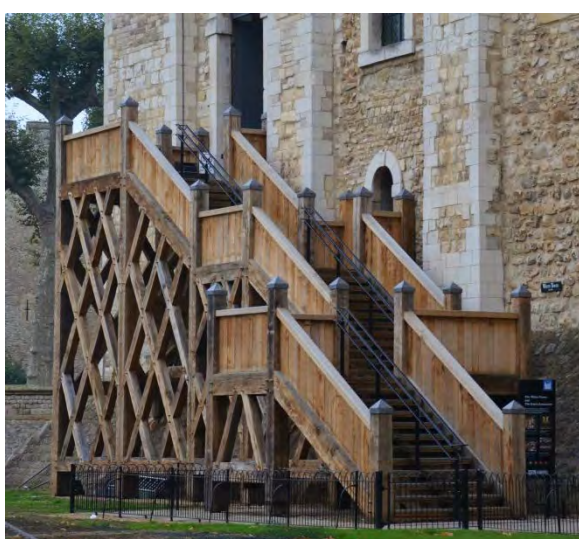
Reconstructed White Tower Steps

© Historic Royal Palaces 2015

5.2.3   A programme of external fabric conservation has been undertaken resulting in extensive stone cleaning, repair and conservation; roof repairs and replacement of roof coverings; joinery and metalwork repairs and redecoration. Particular areas have included the White Tower, the Royal Regiment of Fusiliers building, eight mural Towers (Beauchamp, Constable, Devereux, Brick, Flint, Bowyer, Devlin and Bell Towers), the Queen's House, the North Curtain Wall, the Main Guard Wall, repairs to the South Moat Wharf Revetment Wall and conservation of the external trophies to the New Armouries building.

5.2.4   In 2012-13, Historic Royal Palaces carried out a 'State of the Estate' survey to assess the condition of the building fabric. The survey indicated that 94.8% of the external building fabric was in 'Good' or 'Fair' condition (ie. at Target condition). Where elements of the fabric were judged to be in 'Poor' condition repairs have been made via our conservation programmes, Planned Maintenance Programme and Routine Maintenance Programmes.

Landscape

5.2.5   In response to the need identified in the previous management plan for an updated tree strategy for the Tower of London, a Conservation Management Plan for the Gardens and Landscapes of the Tower was prepared by Land Use Consultants in 2011, which includes a tree strategy that is now being implemented.

5.2.6   Following an Access Audit in 2002, Historic Royal Palaces developed a programme of works to improve physical access on site. An 'Analysis of Historic Surfaces' was commissioned from Keevill Heritage Consultancy to inform proposals for changes to the Tower's surfaces. A number of re-surfacing projects have since been carried out, including temporary re-surfacing of the Causeway, resurfacing of Tower Green and the area between the Waterloo Block and Brick Tower. The cross-overs in Water Lane have been improved and the Tower Shop external paving re-laid. In 2010, Historic Royal Palaces produced an organisation-wide Access Guide with an Access Panel, which is regularly reviewed and updated. We continue to work with visitors and experts to, where possible, increase physical, and provide support and information to our visitors.

Climate change and sustainability

5.2.7   The effects of climate change on the fabric of the buildings were highlighted as an area for review in the previous Plan. Following a noticeable increase in rainfall and average wind speeds, Historic Royal Palaces has begun a programme to

enlarge the overflow systems and has increased the frequency with which trees are inspected on site. Since 2007, we have also worked to protect the Tower foreshore and river wall from erosion and under-mining.

5.2.8   Over the years, in addition to fulfilling our statutory requirements in terms of waste and packaging legislation, we have implemented a strategy of incremental investments across the Palaces and the estates which seek to minimise our impact on the environment. A number of examples are cited below and detailed information can be found in the HRP Sustainability Report on our website. www.hrp.org.uk/about-us/corporate-reports/ At the Tower of London automated meter reading has been installed, which enables close monitoring of water leaks and ensures prompt repair. In 2014/15, electrical sub-metering was also introduced within the Tower of London to enable more careful monitoring of electrical consumption. We continue to focus on waste management and increased re-use and recycling; grey water is now used to irrigate the lawns in the moat and flush some of the public toilets. in 2014/15, no waste was sent to landfill and 83% of waste from the Tower was recycled. At the Tower café, in cooperation with our caterer we have also successfully demonstrated composting as a means of removing food waste from our waste streams through partnering with Simply Waste, a company that collects food waste for anaerobic digestion.

Interiors and Collections

5.2.9   Since 2007, Historic Royal Palaces has made significant progress in the conservation and care of the Tower's collections and interiors. 2015 marked a successful decade of investment in this area of work, totalling more than £1.7m.

5.2.10   Notable examples of conservation work include the Byward Tower, home to the 600-year-old medieval wall painting of St Michael. Conservators carried out detailed scientific analysis of the wall painting and an environmental survey of the space. Further surveys were completed of the wooden beam structure and polychrome traces within the same chamber; as well as full conservation of the floors. Environmental protection of this space continues through UV filter films and window blinds, enhanced draft-proofing, and protective covering of the terracotta tiled floor.

5.2.11   The Chapel of St Peter ad Vincula has received conservation treatment to two large tomb chests immediately outside the Chapel building and also the conservation of medieval monuments and the stone floor within the Chapel. The

delicate medieval floor in the Upper Wakefield Chamber continues to be monitored and protected.

Interior of the Byward tower showing 14th-century wall painting.

© Historic Royal Palaces

Conservation work to an external tomb chest, Chapel of St Peter ad Vincula (2013)

© Historic Royal Palaces

5.2.12   Historic Royal Palaces continues to develop technical understanding through detailed materials and conservation research. In 2015, a new PhD studentship was initiated on the topic of "Developing preventive conservation strategies for 'problem stone': Reigate Stone at the Tower of London", funded by the EPSRC Centre for Doctoral Training in Art Heritage and Archaeology (SEAHA) and Historic Royal Palaces. This research, in collaboration with University of Oxford and Carden & Godfrey Architects provides a unique opportunity to produce holistic conservation strategies for the future.

5.2.13   In 2014, a new collections store facility was purchased at Thames Ditton, near the Hampton Court Palace estate and a full survey was carried out of the collection of archaeology excavated and associated with the Tower of London, a large part of which is now cared for in this new facility. In addition to providing a higher standard of care, the site greatly enhances access for study.

Historical and Archaeological Research

5.2.14   A number of objectives has been met under historical and archaeological research since the last Plan. The two Conservation Plans that were produced in 2000 have been brought together into one plan and were reviewed in 2010 by Historic Royal Palaces and Graham Keevill. An article on the archaeological discoveries made during the Tower Green paving project has been published by the

London and Middlesex Archaeological Society (LAMAS). A book on the geology of the building materials of the White Tower is underway, and an article on the results of an excavation into the Tudor Mint in the Outer Ward has been commissioned. Peer-reviewed articles on the Byward Tower Wall Painting and the Queen's House Council Chamber have been completed and are due to be published, and a funding bid is being made to publish the Broad Arrow Tower research of the 1980s.

5.2.15   Historic Royal Palaces continues to investigate the below-ground and standing buildings archaeological resource as and when conservation and development projects are carried out - all Tower archaeology reports are now sent to the Greater London Historic Environment Record, to be shared on the Urban Archaeology Database. We also continue to research the history of the fabric and events at the Tower to support our conservation, education and interpretation programmes. In June 2015, Historic Royal Palaces gained Independent Research Organisation Status, the first heritage organisation to achieve this recognition. Research assignment time is now allocated to enable curators to carry out independent research, and we are better able to share research through publication, conference talks and lectures.

5.2.16   As proposed in the previous Plan, Historic Royal Palaces has taken on a Records Manager who is improving access to and organisation of our records. We have also increased the role of Curator for Archaeological Drawings from 2 to 4 days weekly enabling us to increase access to records and room plans. In 2014 we successfully launched an Image Library which enables people to view and purchase images of items and photographs in the collections online.

The local and wider setting
5.2.17   The previous Management Plan identified objectives for managing the setting of the Tower, including: to seek to agree and implement a common and consistent approach to sustaining the OUV of the Tower in its setting, as required by the NPPF and PPG (paragraphs 033 and 034); and to act in partnership with statutory authorities and others as appropriate to preserve and enhance the local setting of the WHS. As a means of addressing the second objective, Historic Royal Palaces, on behalf of the Tower WHS Consultative Committee, commissioned an assessment of the local setting and guidelines for its management. This study, the *Tower of London Local Setting Study*, was prepared by Land Use Consultants and Colin Buchanan in 2010. The overall aim was to 'draw out the special historic characteristics of the place, provide a baseline against which to improvements can

be measured and inspire change that is good for the Tower, the surrounding boroughs and London'. The Study, preparation of which was funded by members of the WHS Consultative Committee, has proved effective and successful. It has been commended by UNESCO's World Heritage Committee as an exemplar of its type and it is now accepted as part of the local planning guidance framework. The relevant local planning authorities' Local Plans refer to it as guidance which developers should take into account in drawing up proposals that would have an impact on the local setting of the WHS and early consultation with Historic Royal Palaces with regard to the Study's recommendations is encouraged. It has been particularly helpful in identifying key views of and from the Tower within the local setting and applicants are now asked to provide information on the potential impact of proposals on these views, as well as on the protected views identified in the LVMF.

5.2.18   The previous Plan also included an action to work with the relevant planning authorities to ensure that conservation area character appraisals and management plans were produced for the conservation areas that include parts of the local setting of the Tower. These have all now been prepared and adopted (although Southwark's appraisals do not address issues of views from/of the Tower) – see Appendix B.

Communicating the stories
5.2.19   Shortly after the last Plan was published, Historic Royal Palaces completed its work to define the Tower's 'Palace Personality' - a palace-wide programme to capture the essence or 'personality' of each of our Palaces. The Tower 'Palace Personality' is used internally to define the core visitor proposition and to ensure that the Tower of London experience meets and exceeds visitor expectations.

Audience Development
5.2.20   In 2013, Historic Royal Palaces completed a significant, organisation-wide piece of research to better understand its audiences, 'Audiences First'. The research produced a sophisticated segmentation of audiences by motivation, which enables us to create exhibitions, installations and events specifically targeted towards key segments across the Palaces. This continues to be particularly valuable as a tool for developing audiences through targeted interpretation and programming.

Interpretation
5.2.21   The previous Plan included Historic Royal Palaces' first interpretation

strategy -a clear manifesto for a relatively new and fast-developing discipline. Since then we have embraced the latest techniques in interpretation, matching museums and galleries in innovation and gaining a reputation within the heritage industry for being at the cutting edge of contemporary practice. In 2012, we re-presented the Crown Jewels and, in 2013, we carried out a re-display of the 'Line of Kings' exhibition. We have also introduced new interpretation for previously untold areas of the Tower's history; 'Coins and Kings: The Royal Mint at the Tower' is a new interactive exhibition, created in partnership with the Royal Mint Museum, which explores the story of the Royal Mint.

5.2.22   Historic Royal Palaces has also since developed a new 'creative programming' strand, which explores ways to create a variety of experiences for our visitors that match the historic spaces and stories we have to tell. Our programming takes inspiration from the way royal courts helped to shape the cultural landscape bringing some of the greatest artists, thinkers, scientists from around the world to their palaces. We aim to continue this tradition by bringing living artists into a dialogue with the palaces and their stories to celebrate intangible culture alongside tangible artefacts. In 2014, in partnerships with artists Paul Cummins and Tom Piper, we put on our first major art installation at the Tower, '*Blood Swept Lands and Seas of Red'.* The installation marked one hundred years since Britain's involvement in the WWI. 888,246 ceramic poppies were planted in the moat, each representing a British military fatality during the war. Over 5 million people came to view the installation, which became a significant focal point for commemoration in the UK.

'Blood Swept Lands and Seas of Red', Installation of ceramic poppies in the Tower Moat.

© Historic Royal Palaces

Tower Core Story Project
5.2.23   As well as developing new interpretative techniques, Historic Royal Palaces is also reviewing the interpretative content at the Tower with the aim of refining

and creating a more coherent story-line and interpretation of the Tower's complex history. This is a long-term project, known as the '*Tower Core Story Project*', which began in 2015. The project also aims to contribute to improving the visitor experience, as part of the *Tower Future Thinking* strategy, by rationalising interpretative spaces and introducing an increased range of creative programming that will relieve pressure on popular exhibitions.

Learning

5.2.24   A major area of progress since the last Plan has been our ability to measure learning impact. Historic Royal Palaces has developed a new evaluation framework, the '*Learning Journey framework',* which is designed to measure learning outcomes and ensure that everything we do is audience-focused. The framework helps us to deliver across three key learning areas – Discovery, Participation, and Transformation. By collecting audience feedback, we are able to evaluate how effective our design and delivery is at achieving the desired outcomes and from this we can calculate a range of learning impact scores, which, when combined with our other metrics (Reach, Quality, Value), give us comprehensive insight into our effectiveness at delivering learning.

5.2.25   In 2013, a new strategy was developed for learning and engagement with the aim of significantly transforming its scale and impact. Focus is now placed on creating high-quality, distinctive programmes that put our audiences first and expand our reach on-site, off-site and online. We aim to be more effective through 'fewer, bigger, better' outcomes, that are evidence-based and value for money. A range of activities, events and programmes have been developed and tested in recent years to reflect this new approach; from family festivals to after-hours tours that mix contemporary topics with Tower history.

5.2.26   The Tower continues to be popular with school groups. Since 2007 education visits have increased from 70,000 to 130,000 a year. In 2011, the Tower was once again awarded the Sandford Award for Heritage Education reflecting Historic Royal Palaces' continued contribution to heritage learning. Learning programme highlights include our 'Why Remember?' initiative, in association with the WWI commemorative poppy installation, which encouraged audiences to think about why remembrance was important. The campaign included a partnership with Discovery Education broadcasting national school assemblies from the Tower reaching 1,000,000 students in 60 countries.

The 'Why Remember?' initiative, in association with the WWI commemorative poppy installation,

© Historic Royal Palaces

Community partners and programmes

5.2.27   Historic Royal Palaces has continued to proactively develop programmes with local communities via co-creative approaches that aim to empower as well as engage. We have worked extensively with young people and youth organisations locally. Highlights include working with Arcola Youth Theatre, Hackney to perform extracts from the Tower's archives, working with local primary schools to create an animated retelling of Anne Boleyn's coronation, and working with young people to design a new teen-friendly multi-media site guide. In 2008, we also partnered with registrar offices in Tower Hamlets to host citizenship ceremonies in our palaces.

Digital strategy

5.2.28   Since the last Plan Historic Royal Palaces has developed new digital applications for visitors, a new website and an increasing presence on social media and through this greater opportunity to bring the WHS to further reaching audiences and increase access to the Tower. A Digital Strategy was agreed in 2014, defining a long-term digital programme of change, based on detailed research into our organisational needs and the needs of our audiences. This work will continue to progress in the coming years.

Visitor Facilities

5.2.29   Historic Royal Palaces continues to improve and maintain the facilities on-site through an improvements programme, including refurbishments to the visitor toilets and shops.

6.0   Opportunities, challenges and issues

6.1   Introduction

6.1.1   The Tower possesses unique characteristics that offer opportunities for its future development. Conversely, these same characteristics also raise complex issues that affect the conservation and management of the site. In setting objectives for the management of the Tower, every effort has been made to utilise the opportunities in a way that is appropriate to the Tower's significance and to work towards mitigation of challenges and issues where possible.

6.1.2   The following opportunities, challenges and issues combine those identified in the previous Management Plan (2007) that are still relevant today, with those identified through the *Tower of London Local Setting Study* (2010) and the *Tower Future Thinking* strategy (2015).

6.2   Opportunities

The iconic status and global recognition of the Tower
6.2.1   The Tower has a high profile as a WHS and is a key tourist destination in the UK for overseas visitors and UK nationals alike. The building itself is widely recognised and the silhouette of the White Tower has become an iconic image of London used in publicity by tourism agencies. In recent years, visitor numbers have increased significantly from 2,403,000 in 2009/10 to 3,077,000 in 2014/15. The opportunities presented by this increase are multiple. In financial terms, revenue may be generated from visitors. This revenue is used by Historic Royal Palaces to underpin conservation and interpretation work at the Tower and the other unoccupied royal palaces. The Tower's profile also affords the opportunity to explain the significance of the site and publicise conservation issues – both to the visiting public and to conservation specialists.

Location of the Tower
6.2.2   The Tower is in the heart of London, one of the world's pre-eminent capital cities and a key tourist destination, offering high-quality hotel and infrastructure facilities. While the correlation between accessibility and visitor numbers is difficult to quantify, the Tower benefits from a very high degree of accessibility by public transport in comparison to many other WHS. Set within an intensely urban

area, the Tower also provides a precious amenity and leisure space for local residents and workers. Research during the *Tower Future Thinking* work identified that 63% of pedestrians around the Tower are passing by and do not enter the Tower's pay boundary. This demonstrates the significant level of audiences that could be engaged on the periphery of the Tower.

The Tower's rich history

6.2.3   The interpretation and educational possibilities offered by the history of the Tower are significant. Historic Royal Palaces' ambition – to have inspired learners, rather than simply visitors – reflects this. An extensive and evolving interpretation programme, on-site education team and the development of the Tower's education and community involvement programmes are all ways in which Historic Royal Palaces responds to this opportunity. Programmes are designed to fit into the national education curriculum and the Tower is a key destination for schools, with over 130,000 school children visiting every year.

The resident community, traditions and ceremonies

6.2.4   The presence of the resident community, and the fact that it is intertwined with the history and significance of the Tower, is of great importance. The community's presence offers an opportunity to continue to pass on the Tower's stories through traditions and ceremonies. Continuing traditions outside the Tower walls also provides an opportunity to engage with the wider public.

The Beating of the Bounds Ceremony outside the walls of the Tower

© Historic Royal Palaces 2015

Local historical links

6.2.5   The proximity to the Tower of historic sites and monuments such as Tower Bridge, HMS Belfast, the (former) Royal Mint and the Monument to the Great Fire of London, presents an opportunity for visitors to gain an understanding of the significance of the WHS in the context of the City around it. There is potential for

Historic Royal Palaces to work with local heritage organisations to create a more joined-up visitor journey through, and interpretation of, the City, and to re-establish lost historical links between the Tower, the Thames, and Tower Liberties.

Digital advancements

6.2.6   Advances in technology now enable us to connect with potential visitors offsite in a more engaging way, through social media, and phone applications. This allows us to vastly extend our reach across the world and promote the significance of the WHS to a larger and more diverse audience.

Ownership and management structure

6.2.7   Whilst ownership interests are complex, the Tower is managed by one organisation, Historic Royal Palaces, whose purpose is directed to the site's care, conservation and presentation to the public. Implementation of the Plan will be integrated into the activities of Historic Royal Palaces and its planning and decision-making framework. Historic Royal Palaces directly employs experts in areas such as curation, conservation, interpretation, education and community involvement, who are collectively responsible for achieving these objectives and ensuring the best possible care and management of the Tower as a WHS.

Management of the local setting

6.2.8   Management of the local setting is a challenge, but sharing management responsibilities with a range of stakeholders presents opportunities for collaboration and partnership. The stakeholder engagement work that was begun as part of the *Tower Future Thinking* process has enabled Historic Royal Palaces to strengthen its relationships with local interests, particularly as we seek to 'make a difference beyond the Tower walls'. Over the next few years, there will opportunities for a more joined-up approach to the management of areas within the local setting.

Sharing our research

6.2.9   Archaeological and historical research is essential to supporting the care and conservation of the Tower, and Historic Royal Palaces' objectives in relation to education, interpretation and engagement. With this work comes an opportunity to share our research, not just through onsite interpretation to visitors, but also with the wider world, through the publication of curatorial and archaeological research, and increased access to archives and collections.

Archaeology weekend at the
Tower of London

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6.3   Challenges and Issues

6.3.1   The very characteristics that create opportunities also raise issues that
need to be recognised and addressed.

Conservation

6.3.2   In order to preserve the OUV of the WHS, it is imperative that the Tower
buildings, collections and decorative features are protected and conserved. This
sits at the heart of Historic Royal Palaces' organisational aims 'to give the Palaces
the care they deserve'. The Tower has always been a dynamic site, subject to
changes of occupation and use, hence conservation does not mean that its fabric
will be preserved completely unaltered. The challenge is to ensure that changes
do not detract, but rather sustain and, where possible, enhance significance, thus
sustaining the whole site into the future.

6.3.3.   One of the key challenges that currently faces the Tower is the increased
levels of visitors to the site, which has an impact on management, maintenance
and ensuring the continued protection of vulnerable areas.

Environmental impacts

6.3.4   Consideration also needs to be given to mitigating any negative impacts of
environmental change on the WHS. The Tower, by virtue of its location next to the
Thames, is vulnerable to potential river flooding and rising sea levels. The Thames
Barrier was constructed to protect central London from flooding during
exceptional weather conditions. The *Tower Future Thinking* work found that, in
the first four months of 2014, the barrier was used 48 times, compared with only

four times during the whole of the 1980s. It is possible that future flood events could overtop the Thames Barrier and cause flooding in parts of the Tower, including the moat and the Innermost Ward, which could damage stonework, disrupt electrical and data systems, and disturb the ravens' habitat. The *Tower Future Thinking* work has highlighted this issue and recommends collaboration with strategic forums in London that respond to large scale environmental risks. This subject is considered in detail in the local authorities' flood risk management plans and in the Environment Agency's Thames Estuary 2100 project.

Managing the setting of the Tower

6.3.5   The Tower is located just within the boundary of the London Borough of Tower Hamlets, but parts of its local and wider setting lie within the City of London, the London Borough of Southwark and the London Borough of Tower Hamlets. This division of spatial planning responsibilities means that the setting of the Tower can be vulnerable to a lack of co-ordination in the adoption and application of planning policy objectives between these authorities. In the past few years, there have also been increasing development pressures in the wider setting, which have potential to impact the OUV of the WHS.

6.3.6   At the time of inscription of the WHS in 1988, it was noted by the World Heritage Committee: "The Committee has expressed its regrets regarding the building of the Tower [now Guoman] Hotel, which would have best been avoided, and took note of the assurances of the United Kingdom authorities as to protection henceforth to be granted to the environment of the Tower of London."

Looking west along the Wharf.

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6.3.7   Continued concern about the WHS prompted a joint UNESCO-ICOMOS Reactive Monitoring mission to the Tower in November 2006: one of the outcomes of that visit was the updating and publication of the first version of this

Plan. Ongoing unease about the impact of new development in the setting of the Tower resulted in a further mission in 2011, which expressed similar concerns.

Current inconsistencies in the local setting

6.3.8   The *Tower of London Local Setting Study*, undertaken in 2009/2010, highlighted particular issues relating to pedestrians' experience of the approach to and movement through the local setting and the visibility of the Tower, affecting their ability to appreciate the OUV of the WHS within the local setting. The study highlighted four key areas; the built context and the public realm; approaches and arrival routes; routes within the local setting; and views to and from the Tower. These issues are set out in Sections 4-7 of the study, along with suggested aims and objectives to address them.

Access to the WHS

6.3.9   The A100, the trunk road to the north of the Tower, and the approach over Tower Bridge to the east carry extremely heavy traffic. Both roads are managed by Transport for London (TfL). The A100 separates the Tower from Tower Hill underground station, and visitors' first view of the Tower from the station is tempered by less than ideal access arrangements. The A100 also gives rise to considerable noise and pollution. The obvious access to the Tower from Tower Hill station is down a steep flight of steps and a subway below the A100. This is challenging for those who are not able to walk easily, or with small children. An alternative approach at grade is available through Trinity Square gardens and over the A100 via a controlled pedestrian crossing opposite Tower Hill to the visitor welcome centre, but this is neither obvious, nor well signed. These issues are considered in greater detail in the *Tower of London Local Setting Study* (Section 5: Approaches and arrivals).

Access to the Tower via the A100 underpass

© Historic Royal Palaces 2015

6.3.10   Pedestrians often try to cut directly across the A100 to reach the Tower, which is within sight from outside Tower Hill underground station. A 'Cycle Super Highway' (CSH), which will cross London from east to west, is planned for completion in 2016 by TfL. The CSH will run along the north side of the A100 and there is potential for it to exacerbate the current problem, should visitors try to use the cycle lanes as a crossing point. Whilst HRP supports cycling as a sustainable mode of travel, and recognises that the CSH will make it easier and safer for visitors to cycle to the WHS, our focus is on creating safe access for all visitors to the Tower. We are working with TfL to improve the current road crossing for Tower visitors and TfL has undertaken additional design work on the CSH in order to incorporate a new pedestrian crossing opposite Tower Hill underground station and to widen other pedestrian crossings, as requested by Historic Royal Palaces. Provision of safe access routes for the less able-bodied is a key objective of the London Plan, the local authorities and Transport for London, and this Plan.

6.3.11   While Historic Royal Palaces is working towards achieving appropriate access for people with disabilities throughout the WHS, within the Tower itself there are some areas where access is not possible for the mobility-impaired, such as part of the high-level Tower walkway. Physical and intellectual access audits have been undertaken and a strategy is in place to enable access where possible.

The relationship between Historic Royal Palaces and its on-site partners
6.3.12   The historic and continued presence of on-site partners, such as the Royal Armouries, contributes to the significance of the WHS by continuing links with some of the Tower's historic roles. Close co-operation with and between these partners is essential for the effective operation of the Tower as a whole. Historic Royal Palaces recognises the importance of managing the Tower in consultation and co-operation with its on-site partners.

The relationship between Historic Royal Palaces and the wider community
6.3.13 The Tower of London World Heritage Site Consultative Committee, a group including on-site partners, national organisations, the relevant regional and local authorities and heritage specialists, provides a forum for consulting on all issues affecting the Tower and its environs. Through the *Tower Future Thinking* work, Historic Royal Palaces has begun to build stronger relationships with the wider community in a number of areas, and to work with stakeholders outside the Tower on improvement initiatives.

Traditions, ceremonies and the Tower's living community

6.3.14   The continuation of traditions and ceremonies is of particular importance to the character and understanding of the Tower and is fulfilled, in part, by one of the key resident groups – the Yeoman Warders. In order to sustain and promote the intangible significance of the WHS, it is vital that the knowledge and practise of traditional ceremonies and events is maintained and demonstrated to as wide an audience as practicable and the Yeoman Warders have an important role in helping to achieve this. Currently, the story of the Tower's resident community is felt to be under-represented in the way Historic Royal Palaces communicates the history of the Tower.

Valuing visitors and the resident community and ensuring their safety

6.3.15   At all times, the safety and security of visitors and residents alike must be ensured. The Tower is home to a number of employees and their families and it is important that they are given due consideration. Historic Royal Palaces has in place several mechanisms to protect residents and the public, including a Major Incident Plan that identifies the responsibility of key individuals in the event of a significant incident and the Tower of London Emergency Procedures. Risk assessments are regularly reviewed and updated for all public routes at the Tower, and these routes are inspected daily, against the assessment. Routine maintenance programmes are in place to manage potential risks and, in the event of an incident, first aid is provided to visitors. As a result of the increased numbers of people visiting the site, greater pressure is being placed on the services and resources at the Tower, putting a strain on accommodation and provisions.

Creating coherent interpretation

6.3.16   The *Tower Future Thinking* workshops identified a number of challenges inherent in the way Historic Royal Palaces interprets the Tower's stories to visitors. In particular, the visitor route around the Tower is not prescriptive; visitors can explore the site and the exhibitions in any order they choose, which can lead to a disjointed and sometimes confusing understanding of the site. Staff from the curatorial, interpretation and learning departments have begun the process of developing a 'Core Story' for the Tower to improve story-telling and create a more coherent narrative.

6.3.17   The increasingly diverse range of visitors that the Tower is attracting provides opportunities to reach new audiences, but also presents challenges in creating interpretation that uses the Tower's stories to make links between its history and the world today, in order to demonstrate relevance to modern society.

6.3.18   Visitors from all over the world come to see the Tower and providing them with information in their own language is demanding. Information at the Tower is available in 11 different languages (including French, Italian, Spanish, Russian, German, Japanese, Mandarin and Korean) and there are plans to provide further languages if visitor demographics change. Exterior signage provides interpretation in eight visitor languages, as well as in two local community languages, Somali and Bengali.

Learning

6.3.19   The Tower is a popular destination for school groups. Recent curriculum changes instituted by central government have resulted in a chronological approach to the teaching of history, which has created a range of new challenges and opportunities. A key objective will be to continue to diversify and develop new offers that are relevant and effective across the new curriculum.

Capacity

6.3.20   Ensuring that each of the 3 million visitors the Tower receives each year has an excellent experience and, as a customer, feels valued, is vital to the continued support and appreciation of the Tower as a visitor attraction. The significant increase in visitor numbers to the Tower in recent years has had a detrimental impact on the visitor experience, both in the welcome and entry arrangements and also inside the Tower. Overcrowding, and the frustration of long queuing times for exhibitions, including the Crown Jewels, has caused disappointment for some visitors. A key objective reflected in the *Tower Future Thinking* strategy and this Plan is to improve the visitor experience and address issues of capacity, in order to ensure that visitors are able fully to appreciate and enjoy their visit to the World Heritage Site.

Visitors queuing to visit the Crown Jewels
©Historic Royal Palaces 2015

Promoting the OUV of the Tower

6.3.21   Whilst the Tower is well-known as an iconic historic site, the majority of visitors that come to the Tower do not know that it is a WHS and may be unaware of UNESCO's role in protecting world heritage. The OUV of the Tower is promoted predominantly through the interpretation of the site to visitors, our learning programmes and the continuation of ceremonies and traditions, which are visible to the public. Other ways of appreciating the OUV of the Tower, as in the views and approaches to the Tower, are not well presented.

Future plans and development at the Tower

6.3.22   In order to sustain the OUV of the Tower whilst continuing to attract visitors, Historic Royal Palaces' conservation and development proposals need to balance utilising opportunities with addressing challenges and issues. A number of projects have been completed since the last Plan was published, in accordance with agreed specifications, approved by Historic England as the government's lead advisor on the historic environment. Ongoing and new conservation projects are highlighted in the Aims and Objectives section of this Plan. Further potential projects, as highlighted in the *Tower Future Thinking* strategy, are longer-term and as yet unfunded. All such proposals are assessed in the first instance for their potential impact on the fabric of the historic buildings, the collections and the archaeological remains, and on the OUV of the WHS. Should the projects proceed, appropriate mitigation measures or strategies are also developed.

7.0 Aims

7.0.1 Introduction

The overarching purpose of the Management Plan is to sustain and promote the Outstanding Universal Value (OUV) and Attributes of the Tower World Heritage Site (WHS). This section of the Plan sets out the principal aims for achieving this purpose, the standards that Historic Royal Palaces seeks to maintain and the works that we propose to carry out in order to achieve them.

We have identified six principal aims for the management of the WHS.

Principal Aims:

- To conserve the tangible assets of the WHS
- To research and increase our understanding of the Tower in order to support its conservation and interpretation
- To preserve and enhance the local and wider setting
- To sustain and promote the Tower's intangible assets
- To communicate the stories of the Tower and promote the OUV of the Tower through engaging and effective interpretation
- To ensure the complete visitor experience is reflective of the Tower's WHS status.

Under each of the principal aims, specific objectives and actions have been set for the next 5 years. These have been identified and agreed in response to the opportunities, challenges and issues set out in Section 6.

A summary Action Plan is located at the end of this section and actions will be reviewed twice yearly by the WHS Consultative Committee.

7.1   AIM A - To conserve the tangible assets of the WHS

Buildings and collections

7.1.1   The Tower's adopted Conservation Plans require Historic Royal Palaces to maintain the built fabric of the Tower to the best standards of conservation: 'The built fabric's appearance is of historic interest and aesthetic importance, and speaks directly to the visitor as the most tangible evidence of the site's past'.[15]

7.1.2   With regard to collections and decorative features, a Memorandum of Understanding (MOU) exists between Historic Royal Palaces and Royal Collection Trust, covering pictures, drawings and works of art from the Royal Collection, the Crown Jewels, events at Historic Royal Palaces and accommodation. Historic Royal Palaces has been elected by the Secretary of State for Culture, Media and Sport to take responsibility for ensuring that the security, conservation, environmental conditions and appropriate presentation of the Crown Jewels within the Tower are maintained and consistent with standards necessary for their long-term preservation. An MOU also exists between Historic Royal Palaces and the Royal Armouries. While the Royal Armouries is responsible for the care of its collections, Historic Royal Palaces provides assistance from its qualified staff to ensure that collection care standards are maintained.

Objective 1.   Conserve the Tower's buildings and collections in accordance with sector best practice.

Buildings

7.1.3   The built fabric of the Tower is robust, but, like that of any historic structure, needs to be constantly monitored and maintained. Building materials such as stone and lead will continue to decay owing to erosion resulting from weather, pollution, or inappropriate previous repairs. The Tower is generally able to bear the footfall of large numbers of visitors, although there are vulnerable points (typically in narrow stairways, or where original paint is preserved) where visitor contact has to be carefully managed.

7.1.4   The vast majority of archival material relating to the daily business of the Tower, and building and repair phases is housed at the National Archives in Kew, where it is archived to international standards. The collection spans the work of

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[15] Historic Royal Palaces *The Tower within the Moat Conservation Plan*, 2010 Conservation policy No. 9.

centuries, and includes medieval documents as well as correspondence, plans and specifications up until the 20th century. The British Library also holds many important documents relating to historical events and individuals who administered or were 'kept' at the Tower. The library of the Royal Institute of British Architects contains original plans and elevations of much of Anthony Salvin's Tower restoration work. The National Monuments Record at Swindon also has some limited holdings related to the Tower.

7.1.5   Historic Royal Palaces has its own plan archive containing original and copied material, archived to national standards, situated in the Waterloo Barracks at the Tower, and administered by an architectural drawings curator. The historical material relating to the body of Yeoman Warders is maintained by the Yeoman archivist and is situated also in the Waterloo Barracks. The parish records of St Peter ad Vincula and St John the Evangelist are maintained by the Chaplain at the Tower, and a digitised copy is kept in the Tower Curators' Library. The historic photographic collection is maintained at Historic Royal Palaces' Image Library at Hampton Court Palace.

7.1.6   A collection of archaeological objects is kept in store in Historic Royal Palaces' Collections Store at Hampton Court Palace and at the recently acquired Thames Ditton warehouse, and a Collections Management System database is maintained with other material relating to Historic Royal Palaces' collections. All of Historic Royal Palaces' archives can be consulted by non-employees by prior appointment.

7.1.7   The condition of a historic monument is a matter for constant monitoring and vigilance. The Tower's condition is recorded in the State of the Estate (SOTE), a comprehensive condition survey that is updated every five years and allows Historic Royal Palaces to prioritise conservation and repair programmes. All building work at the Tower requires Scheduled Monument Clearance. This is granted by Historic England on behalf of DCMS. Historic Royal Palaces works closely with the Historic England Inspectors, both prior to submitting applications for consent and when carrying out the building work.

7.1.8   For some minor works, Historic Royal Palaces has special Standing Clearance arrangements, allowing the works to be undertaken without applying for specific clearance on each occasion. These works are defined in the General Maintenance Handbook, agreed between Historic Royal Palaces and Historic England, on behalf of the DCMS. The principal objective of the General

Maintenance Handbook is to secure the continued repair and maintenance of the fabric of the palaces to the highest conservation standards.

7.1.9   The archaeological resource is safeguarded, or thoroughly recorded, throughout all repair and renewal activities. The general presumption for archaeological deposits of national importance is to preserve them *in situ*. Only where this is not possible is the archaeological resource sustained by means of ordered and clearly targeted investigation and recording of the deposits that are to be disturbed.

7.1.10   Repair work is guided by the principles outlined in Historic Royal Palaces' Building Conservation Policy and Guidelines, which is contained in the General Maintenance Handbook. There is a strong presumption in favour of the retention of worthy contributions from all periods of the palaces' existence for the cumulative part they play in the buildings' history.

7.1.11   All projects are recorded in a Conservation and Maintenance Record for each project. Conservation Files incorporate a statement on the philosophy of repair, copies of any archaeological recording, photographs of works in progress, details of materials used, and as-built record drawings.

Action 1.1 – Carry out planned core programmes of internal and external repairs and redecorations, mechanical and electrical improvement programmes and internal accommodation projects to the agreed annual budget.

Action 1.2 – Carry out planned conservation projects identified for the next 5 years, which include:
- Conservation and representation of 4 and 5 Tower Green, a historic Yeoman Warder House, which will be conserved and opened up to the public and will tell the Tower Community Story.
- Resurfacing the Causeway, as part of the Wharf Master Plan and part of a proposal to improve the entrance to the Tower of London.
- White Tower Fire Compartmentation Project to improve the means of escape within the White Tower and enhance the protection of collections.

Action 1.3 – Identify priority conservation and development projects for the Tower over the next 20 years and programme into the Historic Royal Palaces' Major Projects Strategic Plan.

7.1.12   Like the buildings comprising the WHS, collections and decorative features (for example, wall and ceiling paintings, graffiti markings) are similarly vulnerable. Historic Royal Palaces benefits from a professional team of conservators governed by an internationally-agreed code of conservation practices and ethics, resulting from membership of the Institute of Conservation. Historic Royal Palaces actively supports the accreditation of its experienced staff through the national PACR scheme (Professional Accreditation of Conservator-Restorers). With experts from our on-site partners at the Tower, the Conservation and Collection Care team is responsible for delivering a day-to-day programme of active, hands-on work, alongside implementing and developing long-term conservation and collection care strategies and policies that preserve, monitor and display collections safely at the Tower.

7.1.13   The condition of the collection and interiors similarly is a matter for constant monitoring, as all materials will decay over time owing to the impact of contaminates, fire, incorrect relative humidity, incorrect temperature, pests, people (wear and tear), physical forces, radiation (light, both visible and ultra violet) and water. Through a dedicated team that combines scientific, preventive and treatment skills and expertise, we can ensure that the collections and interiors are safeguarded. The Head of Conservation and Collections Care (CCC) at Historic Royal Palaces is responsible for ensuring adequate collections salvage provision. The Tower of London has a Salvage team and action plan. In 2016, Historic Royal Palaces and the London Fire Brigade tested procedures developed by the Brigade's Fire Safety Heritage team for damage control and the salvage of priceless artefacts and collections. This was an important opportunity to test the response of Historic Royal Palaces' staff to an emergency, while increasing firefighters' knowledge of the historic Tower of London site. Other key stakeholders involved included the Metropolitan Police, London Ambulance Service and emergency planning officers from Tower Hamlet's Council.

7.1.14   Preventive conservators protect collections and interiors by slowing down the rate at which deterioration occurs. Treatment conservators chemically and physically stabilise vulnerable and fragile collections and interiors using techniques that do not restore or significantly change their appearance from that which appears 'original'. This is in order to maximise and retain the cultural value of the collection and interiors. All work proposed is recorded through condition audits and by producing treatment reports, and all work undertaken is recorded in detail in individual object treatment files. Conservation scientists support,

influence and guide all our conservation work through researched scientific experimentation, by informing our work and producing practical solutions to complex conservation challenges.

7.1.15   The condition of the collection and interiors is monitored in the State of the Interior Estate (SOIE), a comprehensive condition survey that is updated regularly and allows Historic Royal Palaces to prioritise conservation and treatment programmes.

> *Action 1.4* - Plan and execute the next ten-year State of the Interior Estate Survey programme of works from 2016-2026.

Sharing conservation research and knowledge

7.1.16   Research and the sharing of knowledge with other conservation agencies is a significant element of the conservation work carried out by Historic Royal Palaces. The findings of these and other scientific research projects are shared with other specialists by way of seminars, visits, publications and conferences.

7.1.17   Historic Royal Palaces is committed to communicating conservation to a wide and diverse audience, enabling people to discover how historic sites were crafted, and how they are cared for today. This is delivered through live demonstrations, object handling for schools, expert study days for adults, practical workshops for professionals, research papers for academics and videos and articles for online audiences. Activities take place alongside conservation projects, bringing a powerful immediacy and impact. Historic Royal Palaces aims to increase public understanding of its core guardianship principle – that we have inherited the site from people past and are looking after it for future generations.

Conservators at work on the White Tower project, in view of visitors May 2015

© Historic Royal Palaces

Digital interpretation of the White Tower project that enables visitors to find out about conservation work.

© Historic Royal Palaces

Landscape

7.1.18   The landscape, both hard (stone paving, cobbles, setts) and soft (trees, grass, vegetation), within the WHS boundary makes an important contribution to the character of the Tower and to the OUV of the WHS. The 'Approaching the Tower' Conservation Plan (1999), which deals specifically with the immediate setting of the Tower of London, outlines Historic Royal Palaces' policy regarding the landscaping of the Tower. Conservation Policy 8 outlines the objective: 'To sustain and enhance ecologically important zones in and around the Tower of London, while balancing the needs of those interests with those of the built and buried heritage.'

7.1.19   Historic Royal Palaces has a Conservation Management Plan for the Gardens and Landscapes of the Tower produced by Land Use Consultants, which includes a tree strategy that is now being implemented.

Reactive and Routine Maintenance

7.1.20 The Historic Royal Palaces Maintenance department plans and delivers a Reactive and Routine Maintenance programme across all six palaces. In response to increasing numbers of visitors, particular attention will be given to safeguarding the fabric of the buildings and ensuring that the maintenance of the Tower is able to meet increased demands and potential wear and tear.

Objective 2. Ensure the maintenance of the Tower meets the demands of increased visitor numbers on the fabric of the buildings and management of estate services.

Action 2.1 - Carry out the Planned Reactive and Routine Maintenance Programme for the next five years. Specific works to include:

- Following a review of the protective stair coverings present in the White Towers Flamstead turret, structural design of the stairs protection will be developed and improved to provide sufficient support and protection to the historic fabric beneath.
- Surface repair programmes
- Martin Tower Staircase replacement

The impact of environmental change

7.1.21   The Director General of UNESCO, speaking during the UN Framework Convention on Climate Change in Kenya in November 2006, stressed that protection and sustainable management of WHS is now a priority. He outlined how lessons learnt at several sites worldwide show the relevance of designing and implementing appropriate adaptation measures, while the global network of the WHS is ideally suited to building public and political support. The Tower was used as a case study in the subsequent publication.

7.1.22   Climate change has continued to be a recurring conservation issue affecting World Heritage properties around the world. In Decision 39 COM 7 taken at the 39th session (Bonn, 2015), the World Heritage Committee acknowledged that World Heritage properties are increasingly affected by climate change, and encouraged States Parties to participate in the 21st Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC) in December 2015, with a view to achieving a universal climate agreement and mobilize global climate action on the ground.[16]

7.1.23   An Environmental Policy outlines the overall intentions and direction of Historic Royal Palaces related to its environmental performance, and action plans are incorporated into departmental Annual Operating Plans. The policy delivers Historic Royal Palaces' Sustainability Strategy, information and actions which are reported and published annually in the Sustainability Report.

7.1.24   Energy reduction in historic buildings is challenging. Nevertheless, over the years, a number of initiatives have been implemented and we continue to invest in schemes to drive reductions in consumption of electricity and gas.[17] Energy consumption is monitored through a network of sub-meters installed across the estate, enabling areas for improvement to be identified and targeted, in collaboration with employees and contractors across the organisation. [18]

7.1.25   The Tower is, like the rest of London, at risk from rising river levels, but also from other indicators such as atmospheric pollution and the increasing number of storms. The Tower has not yet suffered unduly, but the experience of other agencies indicates the risk. The *Tower Future Thinking* research highlighted the large scale environmental risks facing the Tower and the need to future-proof the site. Future flooding scenarios will inform the sequence and investment made

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[16] http://whc.unesco.org/en/climatechange
[17] Sustainability Report 2014/15, Historic Royal Palaces, p.2
[18] Sustainability Report 2014/15, Historic Royal Palaces, p.2

in parts of the Tower which are vulnerable to flooding. A Flood Plan is in place, as part of the Tower Major Incident Plan, and Historic Royal Palaces will liaise with local authorities to ensure flood risk policies include the Tower.

Objective 3. Review the storm capacity of principal buildings within the Tower site, focusing on those that have not been reviewed for over 10 years.

Action 3.1 - Carry out an assessment of roofs and gutters across principal buildings within the Tower site. Plan necessary upgrades.

Objective 4. Be cognisant of the TE2100 Action Plan and emerging proposals for the City's defence from potential future flooding.

Action 4.1 – Liaise with the Environment Agency, local authorities and water agencies to ensure flood risk policies cover the Tower of London, including mitigating measures.

7.2 AIM B - To research and increase understanding of the Tower in order to support its conservation and interpretation.

7.2.1   Research into the history of the Tower is crucial, since it is only through comprehensive understanding of the site that Historic Royal Palaces can effectively sustain its OUV for the benefit of future generations.

Archaeological and curatorial research

7.2.2   The Plan seeks to encourage further historical and archaeological research and continued recording as an essential part of conservation and management of change at the Tower. Historical and archaeological research is required to underpin both the care and conservation of the Tower and to fulfil its interpretation, education and access objectives. Conservation and maintenance projects – and exhibitions and programming – require an accurate and informed foundation upon which to base this valuable work. Such supporting work corresponds with Historic Royal Palaces' duty to investigate and understand the WHS in its care and commitment in our Cause and Principles to help everyone to explore the stories of our palaces and to provide the buildings and collections with the care they deserve.

Archaeological research

7.2.3   Despite the continuous series of changes to the buildings and defences of the Tower, it retains considerable archaeological potential and significant features may remain, even if heavily truncated or diminished. Evidence for the Roman city and its defences survives, as does the potential for remains of the developing waterfront. There must be some evidence for the transition from Saxon town to Norman castle, and much has already been found for the development of defences. The moat has proved the extraordinary potential for revealing lost phases of the Tower's development, and studies of the standing buildings have also revealed unexpected archaeological potential. The physical remains of more recent periods - both in below-ground archaeology and as surviving buildings - are an under-appreciated resource. All these aspects of the Tower's heritage fall within nationally-recognised criteria for archaeological research priorities.

7.2.4   The need to investigate the archaeological resource is balanced by a desire to preserve important archaeological deposits *in situ*. Historic Royal Palaces' approach is to observe, investigate and record important archaeological remains

when they are identified before and during conservation and maintenance projects. Archaeological research will be planned over the coming years in line with conservation and development projects. In 2016/17, particular focus will be placed on 4-5 Tower Green, a historic Yeoman Warder House, which will be undergoing a conservation and interpretation project.

Objective 5. Undertake archaeological research associated with annual planned conservation and development projects.

Action 5.1 – Carry out archaeological research into 4 – 5 Tower Green to inform proposals for conservation and interpretation.

Historical research

7.2.5   Historic Royal Palaces has an internal Research Strategy that covers the Tower of London as well as the organisations' other five sites, and generates an ongoing quantity of peer-reviewed material. An Annual Research Plan is set to monitor the delivery of its research and to measure against the purposes set out in the Strategy. It outlines current and forthcoming research projects across the entire organisation, the range of research collaborations established and the level of our engagement with the wider academic and heritage sectors.

Access to research and collections

7.2.6   Historic Royal Palaces has a commitment to sharing its research and understanding of the Tower buildings, collections and histories. New research into such an important site as the Tower is shared with the wider world through publications, lectures, exhibitions, press releases and through our website.

Objective 6. Carry out research in accordance with Historic Royal Palaces' research strategy for the Tower.

Action 6.1 – Develop knowledge that will lead in due course to the commissioning and publication of a Tower Monograph.

7.2.7   Intended research projects at the Tower over the coming years, dependent on resource, are also likely to include:

- Tower of London, the Mint and the Byward Tower - completion of the Mint Street Excavation article for publication in 2016.
- Tower of London Queen's House and Bell Tower – completion of an article entitled 'The Queen's House at the Tower of London, 1500-1750', to be submitted to *The Antiquaries Journal* for publication in 2016.
- Lower Broad Arrow, Tower of London – compilation of all previously completed archaeological analysis from excavations on the Lower Broad Arrow Tower; to be brought together with updated specialist research and stratigraphic analysis, and published (2015 – 2017).
- Blood Swept Lands and Sea of Red – an analysis of the impact of the first artistic commission by Historic Royal Palaces as part of its new Creative Programming strategy (2016 - 2020).

The Tower Core Story Project

7.2.8   The Interpretation team at Historic Royal Palaces is currently leading a comprehensive review of interpretation at the Tower through the 'Tower Core Story Project'. The aim of this work is to create a more coherent, interconnected, consistently relevant and high quality narrative of the Tower that engages existing and future target audiences. This will be achieved through the re-interpretation of significant spaces to provide visitors with a more coherent story line, and will continue over the next 10 – 20 years, supported by research by the curatorial team.

> *Action 6.2* – Carry out historic research in support of the review of interpretation at the Tower through the Tower Core Story Project.

7.2.9   Linked to the above project, specific research will be carried out to identify characters within the history of the Tower that contribute to the development of an interpretation that is more reflective of the diverse spectrum that the Tower's history has to offer. This aims to meet the specific challenges currently faced in supporting and encouraging a more diverse cross-section of visitors from the UK and overseas to make connections with and find relevance in the Tower's history.

> *Action 6.3* – Carry out research into the Tower's lesser known and more diverse characters and history.

Conservation Plans

7.2.10 Knowledge gained through documentary research and archaeological investigation should be added to the Conservation Plan as a continuous process. The Tower of London Conservation Plan is a guideline document which outlines the significance and history of the scheduled monument and its setting. It includes a gazetteer which itemises the areas and buildings of the Tower, and lists their individual history and significance. The document is intended to inform and guide those who are charged with the care of the building fabric and landscape.

Objective 7. Ensure the Tower Conservation Plan is updated every 5 years to inform future management of the WHS.

Action 7.1 – Update the Conservation Management Plan for the Tower in 2016 and seek ratification of the plan from Historic England.

Statement of Significance and Associative Attributes

7.2.11   As set out in Section 3 of the Plan, the Tower's Attributes of OUV have been researched and developed since the last Plan was published. The WHS' 'attributes' are the features or relationships that express its OUV as identified in the revised Statement of Outstanding Universal Value (SOUV) approved by the World Heritage Committee in June 2013. The attributes are usually physical. 'Intangible attributes', such as spirit and feeling, '...nevertheless are important indicators of character and sense of place, for example, in communities maintaining traditions and cultural continuity.'[19] The Tower's associative attributes relating to traditions and customs practised there for centuries are very important, contributing significantly to the site's character and identification. These associative attributes will therefore be further developed and publicised over the next 5 years, in support of the Tower's OUV.

Objective 8. Ensure the Statement of Significance and Attributes fully reflect the OUV of the WHS.

Action 8.1 – Further develop and publicise the associative attributes of the Tower's OUV and review the existing 'Statement of Significance' for the Tower.

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[19] UNESCO Operational Guidelines July 2015, paragraph 83

Access to plans and collections

7.2.12 Historic Royal Palaces' Image Library enables public access to the Tower's photographed plans and collections. 7,000 images from across the six sites are now available to view on the Image Library website www.hrp.org.uk/about-us/image-library/ and this work will continue over the next year.

Objective 9. Increase access to photographed plans and collections.

Action 9.1 – Transfer photographed images of the Tower's architectural plans and collections onto the Image Library management database and website.

7.2.13 A full-time curator now manages the Tower Architectural drawings archive, enabling greater access to the collection. Improved management of the drawings will continue with the setting up of a Collections Management System.

Objective 10. Manage the Tower Architectural drawings archive for the benefit of the public and greater access.

Action 10.1 – Establish the archive as a historic collection complying with Collections Management System best practices.

7.3　AIM C - To preserve and enhance the local and wider setting

7.3.1　Sustaining the Tower's OUV involves not only preserving its attributes and protecting its associative attributes, but also preserving (in the sense of doing no harm to) and enhancing its setting.

7.3.2　Historic Royal Palaces aims to work with all the relevant organisations and authorities seeking to preserve and enhance the WHS's setting, through: encouraging a common and consistent approach to sustaining its OUV: promoting a co-ordinated and high-quality approach to development in the public realm; and seeking to ensure that the local and wider setting is appropriately managed.

7.3.3　The local setting of the Tower provides a unique backdrop to the WHS that deserves appropriate and on-going care. The *Tower Future Thinking* consultation has shown that external stakeholders support our objective of improving the visitor experience outside the Tower walls, which they perceive as mutually beneficial.

7.3.4.　The modern city provides an ever-changing context for, and contrast to, the Tower. It is generally accepted that all new buildings within the setting of the Tower should contribute to the quality of views of and from the WHS, through an exemplary architectural response to their context and high quality execution. What constitutes such a response is, however, always a matter of judgement by the decision-maker. Such decisions need to take account of the potential impact of the development on the OUV of the Tower in its setting, and the attributes that express its OUV, in balance with other important policy considerations. Since the effect of these decisions is cumulative, all/any development in the wider setting should contribute to the legibility of the WHS and to sustaining its OUV.

7.3.5　Specific actions were proposed in the 2007 Plan to implement Objective 2 – *'Work with all relevant organisations, particularly planning authorities, to develop and implement a common and consistent approach to sustaining the OUV of the Tower in its setting'.* These are set out below, with comments on progress to date:

- *Action 2.1*　Establish a permanent officer-level forum to achieve complementary planning policies and their implementation with respect

to the Tower in its setting.

Progress: Not achieved (in a formal sense), but bilateral liaison takes place between the City of London and London Borough of Tower Hamlets[20], and Tower Hamlets seeks to work with all stakeholders in developing planning policies. All the adjacent local planning authorities' current planning policy documents include general policies relating to protection of the setting of the Tower. The need for a more pro-active approach, however, is reinforced by the recommendation of WHC Decision 36 COM 76.91, requiring the State Party [UK] to 'Define specific measures, based on the definition of the setting of the property, to ensure the protection of the property and minimize its vulnerability to potential threats to its Outstanding Universal Value'. This remains an ongoing objective (see also Action 11.1 below), that is consistent with the local planning authorities' statutory duty to co-operate.

- *Action 2.2*   Work with the Greater London Authority, the London Boroughs of Tower Hamlets and Southwark and the City of London Corporation as planning authorities, and Historic England, to ensure that the authorities' emerging Local Plans provide a complementary, detailed planning policy framework capable of managing the Outstanding Universal Value of the Tower in its setting.
  Progress: Achieved in principle, but remains ongoing, as plans and relevant policy documents are developed and/or reviewed. See new Action 11.1.

- *Action 2.4*   Seek to agree with the London Boroughs of Tower Hamlets and Southwark and the City of London Corporation processes to ensure consistent and early consultation[21] with Historic Royal Palaces by developers and by those authorities concerning proposals that could materially affect the setting of the Tower.
  Progress: Such consultation is now encouraged under the NPPF (paragraphs 188-192) and the PPG, and most developers proposing major schemes engage in constructive dialogue to eliminate or mitigate potential harm. Early consultation with Historic Royal Palaces is

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[20] Local planning authorities have a legal duty to co-operate with neighbouring authorities under the Localism Act 2011, in order to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.
[21] It is acknowledged, however, that initial pre-application discussions are often on a confidential bilateral basis between developers and local planning authorities.

specifically required regarding development likely to affect the backdrop of the White Tower, within the protected vista of LVMF View 25 from the Queen's Walk (see Appendix B).

These actions remain valid into the future, and further action is required as follows:

Objective 11.   Promote the protection of the wider setting from development projects that could have a detrimental impact on the OUV of the WHS.

Action 11.1 - Work with the GLA, Historic England and local planning authorities to ensure appropriate policies in local plans and SPDs as the latter are developed or reviewed.

7.3.6   In accordance with the recommendations of WHC Decision 36 COM 76.91, Historic Royal Palaces will seek to promote and gain political support for a workable means to 'further define the immediate and wider setting of the property in relation to its Outstanding Universal Value and embed these in the policies of all relevant planning authorities'. The aim of this action is solely to ensure that development proposals that would have an effect on the setting of the Tower (generally those that because of their location, siting or scale, are inter-visible with the Tower) are identified as such at an early stage, as advised by the NPPF (for example, in paragraphs 129 and 132) and in the PPG, so that the nature of that effect is fully demonstrated and assessed and taken into consideration in making the decision.

Action 11.2 - Seek to promote a workable means to further define the wider setting of the WHS.

7.3.7   The notification requirements under the Town and Country Planning (General Development Procedure) (England) Order 2010 relating to the LVMF View 25 and the general consultation requirements under the NPPF will be re-emphasised to ensure that Historic Royal Palaces are notified of applications that would have a material effect on the setting of the Tower.

Action 11.3 - Re-emphasise the notification requirements relating to the LVMF View 25 under the NPPF.

7.3.8   Historic Royal Palaces will request the relevant local planning authorities to include Historic Royal Palaces as a consultee for any planning applications or documents affecting the setting of the WHS in their Statements of Community Involvement, as these are prepared, or reviewed.

Action 11.4 - Request local authorities to include HRP as a consultee in their statements of community involvement.

Managing the local setting of the Tower

7.3.9   The local setting of the Tower is the area in which pedestrians and river users directly experience the Tower and are able to appreciate the OUV of the WHS. Here, the evolving relationship of the Tower to the natural and historic topography of the city, and the attributes that sustain its OUV can be understood. It is both the interface of the Tower with the city, and a sequence of public spaces defined by buildings, some of which are of importance and value in their own right. The management of the local setting involves both sustaining heritage assets and seizing opportunities for potential enhancement by major change.

7.3.10 Three specific actions were identified in relation to Objective 3 in the first version of this Plan concerning the local realm, as follows:

- *Action 3.1*   Work with all concerned, and in particular the local planning authorities and Historic England, to produce a co-ordinated approach to management of the public realm in the 'local setting' of the Tower of London as defined in this Plan.

- *Action 3.2*   Work with all concerned, and in particular the planning authorities and English Heritage (now Historic England), to develop a design guide for the public realm.

- *Action 3.3*   All interested parties will collaborate to assess the feasibility of preparing an assessment of the local setting by December 2008.

7.3.11   These actions have substantially been addressed through the *Tower of London Local Setting Study* (2010), as detailed below. The one outstanding action relates to developing a design guide for the public realm (Action 3.2), which was envisaged as a second phase of the study. This therefore remains an objective.

Built environment

7.3.12   Redevelopment of the remaining older (1950s–80s) commercial buildings that contribute to the definition of the local setting of the Tower can deliver major improvement. Enhancement will only be achieved, however, through replacements being of appropriate scale, massing and materials, and exhibiting a high standard of design and use of materials, well-integrated into their context. Such buildings should normally aim to provide an appropriate setting for the Tower and other heritage assets, and a backdrop to the open spaces, rather than seeking to be landmark statements in their own right. Further detail and objectives for future redevelopment can be found in Section 4: Built Context and the Public Realm of the *Tower of London Local Setting Study* (2010).

7.3.13   Considering the effects of buildings constructed in the recent past helps inform current decision-making. Section 4 of the Study records in brief the character and quality of these buildings and the public realm that they enclose, dividing the local setting around the Tower into four broad areas, to the north, east, south and west. Particular consideration is given to aspects that influence the public's appreciation of the Tower's OUV. Key issues affecting the built context and public realm are then set out for the four areas, with objectives for future management.

7.3.14   Wherever possible, new buildings should present active frontages to the public realm, especially those frontages facing the Tower itself. Close co-ordination is also required with statutory undertakers to ensure an integrated and sensitive approach to essential works and activities in and around the Tower, avoiding undue disruption. It is essential that statutory undertakers ensure that repairs are completed and the surface is reinstated to its previous quality.

7.3.15   A welcome trend since the previous plan is a diversification of uses in the area. Some offices remain, but they are being joined by hotels with active (restaurant and some retail) street frontages and by residential buildings.

Influencing the wider setting of the Tower

7.3.16   The Tower stands in the midst of a dynamic 'World City', that will continue to develop in scale and density. The status of the Tower demands that a balance is struck taking account of the NPPF (paragraph 132), which requires 'great weight' to be given to its conservation and states that substantial harm to a WHS, as a "heritage asset of the highest significance", should be wholly exceptional. The

NPPF makes clear that the "significance" (OUV) of the WHS derives not only from the physical presence of the property itself, but also from its setting. The PPG states that appropriate policies for the protection and sustainable use of a WHS in its setting should be included in relevant local plans, which should take account of international and national requirements, as well as specific local circumstances.

7.3.17   Views of and from the Tower may be sensitive to the impact of new development if it is visible in the background of the Tower, particularly in the vicinity of the White Tower. New development should therefore have consideration, in particular, to its potential visual impact on the silhouette and relative scale of the Tower. Consideration should be sufficient to ensure that the OUV of the Tower is preserved: the point must not be reached where cumulative impacts on the setting threaten the status of the WHS

Guidance on the wider setting

7.3.18   A relationship between the Tower and the 'eastern cluster' of tall buildings marking the commercial heart of the City has been established for almost half a century. The proposed intensification of the City's 'eastern cluster' is established planning policy. In long views of the Tower from the south and east, the Tower and the eastern cluster are seen in changing relationships, as separate elements of the cityscape, but the distinguishing sky-space between them is diminishing.

7.3.19   London Bridge Tower, popularly known as 'The Shard', nearly 1 km to the south-west of the Tower, was approved following a public inquiry in 2003. The reasons for approval included distance from the Tower, the (generally accepted) quality of the design, and the prior existence of a group of undistinguished tall buildings on the site[22]. It can be judged in 2016 as a completed building; a slender form, drawing the eye upwards, whose elegance and reflective surface goes some way to mitigating the effects of its size and proximity to the WHS. Nevertheless, it creates a visual distraction in many important views of the Tower, especially from Tower Green and the White Tower.

7.3.20   In 2006, the first UNESCO mission had considered that other proposals involving tall buildings in new locations significantly closer to the Tower, or appearing in different directions from existing clusters, could be incompatible with sustaining its status as a WHS. The Minerva tall building scheme, then

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[22] The conclusions of Inspector Gray in the public inquiry (paras 16.59-87), supported by the Secretary of State in granting consent.

proposed to the north fortunately was abandoned, but the proposal for a substantial new office building at 20 Fenchurch Street was supported by the Inspector and Secretary of State following a public inquiry in 2007 and was completed in 2014.

7.3.21 Building activity since 2007 enables an assessment to be made based on physical reality. Several additions, either built or consented, to the 'eastern cluster' have reinforced its identity, verticality and scale and begun to change its relationship with the Tower. The cluster is now higher and denser than it was in 2007. 20 Fenchurch Street, now completed, stands west of the Tower, but outside the 'eastern cluster' policy area, its volume swelling as it rises, and the 2006 Mission's points can be seen to be apt. The 'Shard' on the south bank is a singular, vertical object that has not overwhelmed the setting of the Tower. Nonetheless, the 2011 UNESCO mission reiterated the earlier Mission's concerns and asked the State Party, in particular, to "Regulate any further build-up of the area surrounding the Shard of Glass', ensuring that approved heights do not exceed a height whereby they would become visible [from the Inner Ward]".

7.3.22 There are many views into and out of the Tower. The most iconic view is that from City Hall, which is designated under the London View Management Framework (London Plan Policy 7.11). This view is specifically protected from inappropriate new development, reflecting the guidance contained in the Mayor's LVMF. In addition, the LVMF states: 'New development should respect the setting of the Tower of London and should not dominate the World Heritage Site – especially the White Tower. Consideration should be given to advice set out in the Tower of London World Heritage Site Management Plan, published by Historic Royal Palaces.'[23] (see below and Appendix B)

7.3.23 Redevelopments of existing buildings within the wider setting should take the opportunity where possible to enhance the setting of the WHS. New buildings that are in the shadow of buildings that adversely affect the WHS should normally be designed without reference to the intervening, negative building.

Specific aspects of the wider setting
7.3.24 The wider setting includes buildings and areas beyond the local setting that are inter-visible with the Tower, and sites and areas where major

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[23] LVMF paragraph 415

development, depending upon its scale, could have an effect on the setting of the WHS.

London View Management Framework

7.3.25 The LVMF identifies a single viewing point for the designated view (25A), and three assessment points (25A.1, 25A.2 (west) and 25A.3 (east)). The Townscape View includes a "Protected Vista" from viewing point 25A1 and a "Protected Silhouette" in the view of the White Tower from Queen's Walk between viewing points 25A.2 and 25A.3. The Protected Vista is defined in LVMF Appendix D as a "Landmark Viewing Corridor" from the viewing point on Queen's Walk to the Tower, and a "Background Wider Setting Consultation Area". Further detail about the application of the LVMF can be found in Appendix B.

Aldgate

7.3.26 The Mayor's policies and those of the London Borough of Tower Hamlets accept the establishment of a cluster of tall buildings at Aldgate, but acknowledge that the form of the cluster must consider the impact on the background to this view. Those buildings already granted planning permission (and being built) will be hidden by the White Tower itself in the LVMF protected vista. The London Borough of Tower Hamlets has stated in the Aldgate Masterplan (2007) that 'building heights... should decrease away from this central cluster of buildings', which is consistent with the objectives of this Plan. In views from Queen's Walk, the emerging skyline to either side (east and west) of the White Tower has risen incrementally over the past decade, so that the predominant height of buildings visible as the immediate backdrop to the Tower is now at, or slightly above, the tree line.

Eastern cluster

7.3.27 The 'eastern cluster' of tall buildings in the City of London stands apart to the west, with permitted towers currently rising to an apex at 22 Bishopsgate (formerly known as 'The Pinnacle). A new scheme for this site, recently granted planning permission, has a different, broader profile towards the Tower than the (unbuilt) consented scheme which preceded it. It is also not now likely to be the tallest building in the cluster. Proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, will continue to need to consider their effect on the established eastern cluster, the space between it and the Tower and the effect on the ability to recognise, understand and appreciate the OUV of the Tower. Proposals to the east of the White Tower, beyond the area

covered by the Aldgate Masterplan, will need to consider their effect on the ability to recognise and appreciate the WHS from the LVMF assessment points outside City Hall.

South bank of the Thames

7.3.28   The World Heritage Committee recommendation **35 COM 76.114** to 'Regulate any further build-up of the area surrounding the Shard of Glass', ensuring that approved heights do not exceed a height whereby they would become visible from the Inner Ward' is specifically relevant to development in this area, for which draft supplementary planning guidance, the *Bankside Borough and London Bridge Supplementary Planning Document and Opportunity Area Planning Framework* was published in 2010 (see Appendix B). London Bridge is designated as an opportunity area for tall buildings in the London Plan, and the area to the east of the Shard can accommodate substantially tall buildings without their being visible from the Inner Ward, as demonstrated by the proposed 'Quill' building consented in 2011.

Objective 12.   Raise awareness of the Tower of London Local Setting Study 2010 among developers and decision makers.

Action 12.1 - Promote the *Tower of London Local Setting Study 2010* to developers when notifications of applications for developments are received and work with the GLA and local planning authorities to raise the Study's profile with developers and local planning authorities.

Action 12.2 - Work with all concerned, and in particular the local planning authorities and Historic England, to promote the development of a design guide for the public realm.

Objective 13.   Seek to improve the quality and coherence of the Tower's local setting.

Action 13.1 - Work with responsible authorities and partners by contributing to short-term opportunities and developing long-term strategies to improve the quality and coherence of the Tower's local setting (See *Tower of London Local Setting Study 2010*).

Objective 14. Re-establish and interpret lost historic links.

Action 14.1 - Work with local museums and heritage organisations to re-establish and interpret lost historic links between the Tower, the Thames and the Liberties, for example, to develop a common digital infrastructure to guide and inform the visitors approaching the area surrounding the Tower.

7.4   AIM D - To sustain and promote the Tower's intangible assets

Maintaining and passing on traditions and ceremonies

7.4.1   The most fragile element of the history preserved by the Tower is that which is intangible: its constitutional place and its ceremonies and traditions. Although not a part of the formal inscription criteria, it is considered that these intangible assets should be sustained in the same way as the conservation of the fabric and the collections is conserved, and should be planned with the aim of maximising opportunity for the public to witness them.

Objective 15.   Ensure that the knowledge and practise of traditional ceremonies and events is maintained and demonstrated to as wide an audience as practical.

7.4.2   Active participation in State events must be given an absolute priority. These include movements of the Crown Jewels for State occasions, gun salutes and visits by official guests of the Monarch and State.

7.4.3   Those traditional events and ceremonies that no longer have a practical purpose, but which are important to the history of the Tower, must continue to have sufficient resources devoted to them to ensure their continuance. They include the Ceremony of the Keys, Constable's Dues, Constable's Installation, Beating the Bounds, the Ceremony of the Word and the Ceremony of the Lilies and the Roses. In order to provide the expertise for parades and authentic uniforms rather than costumes, the Tower Officers and Yeoman Warders should continue to be recruited from those with a military background.

7.4.4   The interpretation of traditions and ceremonies is a challenge for Historic Royal Palaces, particularly to an audience for whom English is predominantly not their first language. Improvements should be made to enable visitors to better understand and engage with the traditions and ceremonies that are played out.

Action 15.1 - Define the 'associative attributes' relating to the ceremonies, traditions and myths of the Tower and publicise to further inform how Historic Royal Palaces sustains and promotes the intangible assets.

Action 15.2 - Review and improve the ways in which Historic Royal Palaces promotes the traditions and ceremonies of the Tower as part of the Tower Core Story Project.

Ceremony of the Keys

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Valuing the resident community

7.4.5   The Tower's resident community, which is approximately 100 strong, makes an important contribution to the intangible significance of the WHS. The Tower provides accommodation for the Resident Governor, Officers, and Yeoman Warders and their families. For most of them, the Tower is their principal residence. They are tenants of Historic Royal Palaces and a two-way responsibility is fundamental to the terms of their leases. Historic Royal Palaces must ensure that the residents abide by these terms in order to protect the Tower's historic fabric, but similarly be bound by the terms of the lease to ensure that the residents receive a proper and reasonable service from their landlord.

7.4.6   The residents' goodwill and tolerance is essential to the continued conduct of daily operations at the Tower. Their ability to go about their lives with privacy and with a minimum of disturbance must be protected and a reasonable balance struck between that and commercial need.

Objective 16. Value and sustain the Tower's living community.

Action 16.1 – Review and improve the ways in which HRP promotes the traditions and ceremonies of the Tower as part of the Tower Core Story Project.

Action 16.2 - Over the next 5 years review the community accommodation and services provisions in order to develop a long-term strategy for dealing with increasing pressures placed on resources.

Interpreting the stories of the Tower community

7.4.7   The *Tower Core Story* project has highlighted an under-representation in the interpretation of the Tower community to visitors. The community's story is a key part of the Tower's intangible assets which should be valued, sustained, interpreted and, where appropriate, made accessible to visitors. Historic Royal Palaces will seek ways to increase access to and improve interpretation of the Tower community.

Objective 17.   Improve the promotion and integration of the Tower community's story in the interpretation of the site and increase access to areas that demonstrate the role of the Tower community.

Action 17.1 - Review the ways in which Historic Royal Palaces tells the Tower community's story and the ways in which it engages with visitors through the Yeoman Warder tours.

Action 17.2 - Carry out the works necessary to make publicly accessible a historically significant Yeoman Warder's house (4 and 5 Tower Green).

7.5 AIM E - To communicate the stories of the Tower and promote the OUV of the Tower through engaging and effective interpretation.

7.5.1 Communicating the stories of the Tower is a key part of promoting the historic significance of the WHS and bringing increased knowledge and understanding of events that have taken place at the Tower to the wider world. Historic Royal Palaces' organisational Cause is to 'help everyone to explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built'.

Interpretation strategy and approach

7.5.2 Interpretation is one of the key mechanisms by which Historic Royal Palaces delivers its Cause at the Tower. Historic Royal Palaces puts learning at the heart of everything created for visitors. All content is based on rigorous research and, whilst the way in which visitors engage with it is not prescribed, we provide layers of knowledge content for all ages and backgrounds, helping people to unlock the stories of the Tower in their own way.

Interpretation at the Tower ©Historic Royal Palaces 2015

Objective 18. Ensure that the stories of the Tower are communicated effectively to a wide and diverse audience.

7.5.3 The creative design of the visitor experience at the Tower is overseen by a specialist team of Interpretation Managers and Producers, who use a range of interpretive tools including static design, exhibitions, signage, live presentation,

craft skills demonstrations, object display, re-enactment events, performance, audio visual and digital techniques, and art commissions.

7.5.4   Our approach to creative programming and exhibitions is rooted in seven key principles:

- History where it happened – we create experiences that are authentic and site-specific. From standing on the spot where history was made to creating immersive moments of time-travel and magic, interpretation brings history to life and is rooted in and inspired by the palaces and people who inhabited them.
- Drama and panache – we create un-missable experiences of the highest quality, style and beauty, with a heightened sense of drama.
- Choose your own adventure – we create experiences that welcome and guide visitors through the palaces, allowing them to explore on their own terms and make meaning in their own way through encounters that are entertaining and intellectually and emotionally engaging.
- Tradition with a twist – curatorial research underpins all interpretation and the public's trust in us to be authentic allows us to create intriguing, thought-provoking experiences.
- Contemporary relevance – each palace experience explores universal emotions across time and space. We capture and reflect the spirit of the time in an inclusive and accessible style, drawing out the relevance of history in our lives today. We represent a range of voices to reflect all of contemporary society.
- Sense history – we encourage visitors to explore the palaces using each of their senses, to make visceral connections with the building and its past.
- Inside out – we invite visitors to see behind the scenes and to share skills; not simply presenting finished work, but allowing visitors in on the creation.

7.5.5   At the Tower of London, 'Fortress, Palace, Prison' is the top level framework which supports and guides visitors in their journey around the site. It enables visitors to see how our range of extraordinary stories fits into an overall understanding of the Tower and its significance. At the top of this framework, the visitor understands that the Tower is a Royal Fortress and from here it cascades down, enabling visitors to discover all of the other functions, such as guarding the

Crown Jewels, keeping newly-minted coins secure, storing state records and incarcerating high profile prisoners.

7.5.6   A key priority highlighted by the *Tower Future Thinking* work was the need to create a more coherent narrative of the Tower story.

> *Action 18.1* - Develop a coherent historical narrative and begin a programme of works to update and improve the interpretation of the Tower through the *Tower Core Story Project*.
>
> *Action 18.2* - Review the English language level of interpretation and adjust where necessary in order to reach visitors for whom English is not their first language.

Learning and Engagement

7.5.7   The unique identity of the Tower embraces the buildings that survive, the intangible heritage the buildings represent, the compelling stories that have been played out within their walls, and the pivotal role that the site has played in the history of our nation, as well as the immersive properties of the space itself. Taken together, these elements provide Historic Royal Palaces with the unique ability to inspire learning in visitors, engaging them not only with the history of the sites, but also in a range of participatory activities designed to engage the widest range of audiences.

7.5.8   Communicating the historic and cultural importance of the Tower requires a world-leading learning and engagement programme that directly responds to the needs of all our key audiences, including schools (students and teachers), families, young people and adults. Historic Royal Palaces intends to build on its reputation as an acknowledged leader in the heritage learning field and has consistently improved the quality and extended the reach of its learning and engagement offer at the Tower and the other palaces in its care.

Learning and Engagement strategy and approach

7.5.9   The Learning and Engagement strategy aims to transform Historic Royal Palaces' learning and engagement offer through scale and impact, increased audience-focus, and the delivery of high-quality, distinctive, and transformative learning programmes. Historic Royal Palaces intends to double audience reach through onsite, offsite and online content and presence, add national programmes

to our portfolio, and embed learning into everything we do. This will be achieved by creating distinctive new learning experiences, working in new ways within the learning team, creating partnerships with other organisations, creating fewer, bigger, and better programmes, and using a bespoke, outcomes-based system to design, deliver and evaluate all our programming.

7.5.10   Learning and Engagement puts audiences first through the use of an outcomes based framework called the Learning Journey framework which ensures that everything we do is audience-focused.
Our key audiences are:

- Formal – young people 4-19 in formal education (and their teachers)
- Families and young people – informal and intergenerational learning
- Adults – formal and informal learning

The Learning Journey framework helps us to deliver across three key learning areas – Discovery, Participation, and Transformation. By collecting audience feedback we are able to evaluate how effective our design and delivery is at achieving the desired outcomes.

7.5.11   We also use a comprehensive range of audience research and insight to inform programme development. A departmental audience development plan ensures that we are engaging with a diverse range of local audiences.

7.5.12   Over the next five years, particular focus will be placed on developing a family audience and increasing the numbers of young people that visit the Tower.

> *Action 18.3* - Improve the learning experience and understanding of Tower history through a targeted programme and resource for families and young people.

Schools programmes

7.5.13   The Tower welcomes around 130,000 school-age students each year, 65% of whom come from a domestic audience. Recent curriculum change has resulted in a revised approach to the teaching of History. Historic Royal Palaces has created a range of new offers to exploit opportunities at the Tower for Key Stage

3-5 (students aged 11- 18) and a programme is currently being diversified in order to ensure relevancy to the curriculum for Key Stage 1-2 (students aged 4 – 11).

Action 18.4 - Complete the review of Tower schools programmes by the end of 2016, and make relevant changes in 2017/18.

Impact and relevance

7.5.14   Historic Royal Palaces is committed to ensuring that our learning programmes deliver stories that have impact and relevance to our audiences. The new learning strategy places focus on creating learning programmes that are tailored to our audiences and which can be evaluated so that we can understand how and where they have impact and relevance with visitors.

7.5.15   As our audience has diversified, we have begun to seek ways to bring out the significance of the Tower, its stories and relevance to today's society. Our programme of adult learning events and study days, working with our on-site partners the Royal Armouries and Royal Regiment of Fusiliers, offers a range of informal learning opportunities for adults of all ages. This includes our series of evening panel debates with historians and thinkers that use the Tower's stories to illuminate current issues. These are designed to attract new audiences to Historic Royal Palaces, reflecting London's younger and diverse population.

7.5.16   We are also committed to reviewing and updating the way in which we deliver stories, using new digital technologies and creating a variety of ways to engage. Rather than just delivering the history of the Tower, our new 'Experience' programmes focus on providing a range of informal opportunities for 11-19 year olds to take part in unique, social, and participatory activities, allowing us to engage a more diverse group of young people. Similarly, the 'Digital Missions', which are delivered through smart technology onsite, provide character-led, interactive adventures, which encourage schools and families to get out and explore the Tower and its stories. They balance learning and fun through gamification, prompt our audiences to investigate what's around them through a series of challenges, and give practical support and help to navigate the palaces. These have been particularly successful with engaging younger boys. Over the coming years, the Learning team will continue to test and develop these new ways of learning to ensure impact and relevance with our audiences.

Objective 19.   Deliver stories with impact and relevance.

Action 19.1 - Develop learning and interpretative programmes that demonstrate the relevance of the Tower's history to modern society in a way that encourages participation from a wider audience.

Objective 20.   Develop means to communicate the Tower's stories beyond the Tower walls.

7.5.17 The *Tower Future Thinking* strategy recognised an opportunity for Historic Royal Palaces to reach new audiences outside the Tower walls, from local workers passing by in their lunch hours to people using social media across the world. In the next few years, Historic Royal Palaces will be looking at ways to capitalise on this opportunity and develop strategies around taking the Tower's stories beyond its walls.

Action 20.1 - Develop digital and social media strategies within the *Tower Core Story* framework to extend reach beyond the Tower of London site.

7.6   AIM F - To ensure the complete visitor experience is reflective of the Tower's WHS status

Visitor welcome and entry

7.6.1   From Tower Hill, visitors enjoy an open and unobstructed view of the Tower on its western edge. However, the current ticketing arrangements provide a poor visitor experience; queues are long and visitors have difficulty navigating across Tower Hill. Historic Royal Palaces aspires to improve the ticketing, welcome and entry experience to a level appropriate to a WHS. Streamlining the ticketing and entry process will allow visitors to enjoy the view of the Tower and the experience of entering a fortress, a palace and a prison. A number of short-term measures to improve visitor flow are currently being developed and we are in the process of developing long-term solutions in order to provide a world-class entry experience.

Objective 21.   Improve access to the site and the start of the visitor experience from the Tower arrival points.

Action 21.1 - Develop an integrated signage strategy with Transport for London, London Borough of Tower Hamlets and Historic England.

Action 21.2 - Provide improved orientation and information to enable visitors to plan their day.

Action 21.3 – Promote, through cooperation with partners, a new crossing for pedestrians in front of Tower Hill tube station.

Objective 22. Explore ways to resolve the current issues with ticketing, queuing, security checks, physical entry to the site and interpretation of the causeway.

Action 22.1 - Roll out the Historic Royal Palaces' Visitor Experience Strategy (VESII) at the Tower in 2016/17.

Action 22.2 - In 2017/18 carry out the Middle Tower Entry Project, which includes the Causeway re-surfacing and immediate signage and orientation improvements.

Action 22.3 - Work with partners to unlock the barriers to our long-term solution for the Tower entry arrangements – for example, explore alternative means of extending the Wharf access across the Pier.

7.6.2   Following increased visitor numbers, capacity has become a challenge for the Tower as a visitor attraction. The *Tower Future Thinking* strategy identified an ambition to 'expand the experience within the Tower walls'. Historic Royal Palaces is researching the potential to open up new areas within the Tower in order to take the pressure off exhibition spaces, particularly the Jewel House, and to expand the visitor experience, allowing access to new areas and opportunities to enjoy and experience different parts of the WHS. This includes potentially opening up access to the moat, which would offer visitors the opportunity to have an authentic experience of the Tower dominating its surroundings.

Visitors queuing at the Tower of London

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Objective 23.   Increase physical capacity and improve visitor flow within the Tower walls.

Action 23.1 – Review the interpretation of the site (through the Tower Core Story Project) to create a more coherent story and improved visitor flow.

Action 23.2 - Explore the feasibility of opening up the moat to visitors.

Action 23.3 - Explore the feasibility of and business case for allowing visitors access to the White Tower roof.

Action 23.4 - Carry out a short-term programme to test and improve the visitor flow in the Jewel House.

Accessibility

7.6.3   Historic Royal Palaces is committed to ensuring that the Tower and interpretation of its stories is accessible to everyone, wherever practical and reasonable, and as required under the Equalities Act 2010.

7.6.4   Wherever possible, there will be no difference between the experience of a disabled and a non-disabled visitor. Where there are spaces that are hard, or even impossible, for visitors with mobility problems to access, Historic Royal Palaces is keen to provide alternative interpretation and virtual access, for example, touch-screens in accessible areas. A virtual tour of the Medieval Palace and south and east Wall Walks is available on our website. Live interpretation is one of the ways in which stories are made accessible. This generally takes place in physically-accessible areas of the Tower and engages with different senses, using interpreters who are able to gauge audience knowledge and ensure the interpretation is intellectually accessible.

7.6.5   Historic Royal Palaces has an organisation-wide Access Guide detailing access across all the palaces, compiled with the help of Access Panels. The Tower of London has its own detailed Access Guide available on site and on the website. For visitors who are blind and partially sighted we offer a room description service led by trained volunteers. We provide information and site maps in Braille and large print and also handling points and tactile models of objects, for example at the Tower of London we have tactile models of the Crown Jewels. For visitors who are hearing impaired we offer British Sign Language tours and information is provided on the visitor website in British Sign Language. An access guide has also been developed for parents/carers of children on the Autistic Spectrum which is available on site and on the website www.hrp.org.uk. Historic Royal Palaces will continue to seek to increase access where possible; we are currently looking at ways in which alternative intellectual access can be achieved in limited situations, by using Wi-Fi and downloadable applications for mobile phones.

Security and safety

7.6.6   The security measures and procedures for the Tower follow the Historic Royal Palaces' Security Instructions, which in turn follow the Cabinet Office issued *Manual of Protective Security*. The Tower also issues its own Standing Orders; Section 1 of which covers 'Incident Reaction' and Section 2 'Security General' and reflect Historic Royal Palaces' Security Instructions.

7.6.7   The Tower Group Chief Security Officer is responsible for the day-to-day security of the Tower and reports to the Deputy Governor (Head of Operations). Final and ultimate responsibility rests with the Governor of the Tower (Tower Group Director). The Historic Royal Palaces Security Advisor is available to provide advice on all security matters including recommendations for security

works and equipment and is able to draw upon specialist advice through the Cabinet Office Security Policy Division and the Security Service's 'Centre for the Protection of National Infrastructure' as necessary. The Security Advisor conducts a detailed annual survey of all aspects of security at the Tower and produces a report on Historic Royal Palaces' security which is sent to the DCMS. Safety at the Tower is maintained in accordance with Historic Royal Palaces' Health and Safety Management Policy.

7.6.8   Historic Royal Palaces has in place several mechanisms to protect residents and the public. The Major Incident Plan identifies the responsibility of key individuals in the event of an incident, and is tested once a year. The Tower of London Standing Orders contains immediate response plans for events such as fire, flood, terrorist activity or other security breaches. These are tested routinely by the fire brigade, police and the army. Risk assessments are in place for all activities at the Tower. Public routes are inspected on a daily basis prior to opening. Routine maintenance programmes are in place to manage potential risks from such as lighting, floor finishes and electrical equipment. In the event of an incident, first aid is provided to visitors.

Promoting the Tower's significance

7.6.9 The Tower of London is an iconic structure that is internationally recognised alongside other WHS such as the Pyramids, Krac de Chevaliers, the Taj Mahal and the Great Wall of China. Historic Royal Palaces promotes the significance through a variety of means, from its interpretation and communication with its visitors - both onsite and across the world, its educational programmes and work with schools and local communities, the publication of its curatorial research, and the continued archaeological research and conservation projects that it funds. All of these seek to highlight and promote the significance of the WHS.

Objective 24.   Raise awareness of the Tower as a WHS.

7.6.10   The *Tower Future Thinking* research found that onsite visitor awareness of the Tower's WHS status is currently low, therefore more needs to be done to promote the Tower's WHS status and UNESCO's role in defining and protecting sites of international importance.

> *Action 24.1* - Review the way Historic Royal Palaces currently communicates the Tower's WHS status.

TOWER OF LONDON MANAGEMENT PLAN 2016
AIMS AND OBJECTIVES ACTION TABLE

The overarching purpose of the Management Plan is:

To sustain and promote the Outstanding Universal Value (OUV) of the Tower WHS

To support/facilitate this, 6 key **aims** and supporting **objectives** have been adopted/identified, as set out below. These also seek to tackle the **challenges** and **issues** recognised in the Plan, utilise the **opportunities** and address priorities deriving from the *Tower Future Thinking Strategy* 2015.

The following actions are not exclusive to one key aim or objective, they are ordered as follows for the purpose of demonstrating how Historic Royal Palaces seeks to achieve the overall key aims for managing the site and to monitor how these are being met.

Key Aims (A – F)	Current challenges, issues and opportunities	Objectives for the next 5 years	Actions to realise objectives
A. To conserve the tangible assets of the WHS	Challenge - continuing cycle of conservation work required to the physical fabric of the WHS.	1. Conserve the Tower's buildings and collections in accordance with sector best practice.	1.1 Carry out planned core programmes of internal and external repairs and redecorations, mechanical and electrical improvement programmes and internal accommodation projects to the agreed annual budget. 1.2 Carry out planned conservation projects identified for the next 5 years: - 4 -5 Tower Green - Resurfacing the Causeway - White Tower Fire Compartmentation Project 1.3 Identify priority conservation and development projects for the Tower over the next 20

			years and programme into the HRP Major Projects Strategic Plan. 1.4 Plan and execute the next 10 year State of the Interior Estate survey programme of works from 2016 – 2026.
	Challenge - wear and tear from increasing numbers of visitors.	2. Ensure the maintenance of the Tower meets the demands of increased visitor numbers on the fabric of the buildings and management of estate services.	2.1 Carry out the planned Reactive and Routine Maintenance Programme for the next 5 years. Specific works include: - White Tower Flamstead Stairs repair following wear and tear by visitors. - Surface repair programmes - Martin Tower Staircase replacement.
	Challenge - Environmental factors. Increased risk of flooding to the Tower which could have a detrimental effect on the fabric of the Tower.	3. Review the storm capacity of principal buildings within the Tower site, focusing on those that have not been reviewed for over 10 years. 4. Be cognisant of the TE2100 Action Plan and emerging proposals for the City's defence from potential future flooding.	3.1 Carry out assessment of roofs and gutters across principal buildings within the Tower site. Plan necessary upgrades. 4.1 Liaise with the Environment Agency, local authorities and water agencies to ensure flood risk policies cover the Tower of London, including mitigating measures.
B. To research and increase understanding of the Tower in order to support its conservation and interpretation.	Opportunity – continually improve understanding of the site through curatorial and archaeological research. Challenge – the complex nature of the history of the Tower and the challenge of demonstrating its relevance to an increasingly diverse audience.	5. Undertake archaeological research associated with annual planned conservation and development projects. 6. Carry out research in accordance with HRP's research strategy for the Tower.	5.1 Carry out archaeological research into 4 – 5 Tower Green to inform proposals. 6.1 Develop knowledge that will lead in due course to the publication of a Tower monograph. 6.2 Carry out historic research in support of the review of interpretation at the Tower

			through the Tower Core Story Project.
			6.3 Carry out research into the Tower's lesser known and more diverse characters and history.
		7. Ensure the Tower Conservation Management Plan is updated every 5 years to inform future management of the WHS.	7.1 Update the Conservation Management Plan for the Tower in 2016 and seek ratification of the plan from Historic England.
		8. Ensure the Statement of Significance and Attributes fully reflect the OUV of the WHS.	8.1 Further develop and publicise associative attributes of the Tower's OUV and review the existing 'Statement of Significance' for the Tower.
	Opportunity - share our research with the wider world.	9. Increase access to photographed plans and collections.	9.1 Transfer photographed images of the Tower's architectural plans and collections onto the Image Library management database and website.
		10. Manage the Tower Architectural drawings archive for the benefit of the public and greater access.	10.1 Establish the archive as a historic collection complying with CMS best practices.
C. To preserve and enhance the local and wider setting	Challenge - increasing development pressures in the wider setting.	11. Promote the protection of the wider setting from development projects that could have a detrimental impact on the OUV of the WHS.	11.1 Work with the GLA, Historic England and local planning authorities to ensure appropriate policies in local plans and SPDs as the latter are developed or reviewed.
			11.2 Seek to promote a workable means to further define the wider setting of the WHS.
			11.3 Re-emphasise the notification 7.3requirements relating to the LVMF View 25 under the NPPF.
			11.4 Request local authorities to

			include HRP as a consultee in their statements of community involvement.
	Challenge - current inconsistencies in the local setting that affects people's ability to appreciate the OUV of the Tower. Opportunity – capitalise on the stakeholder engagement work started by the Tower Future Thinking strategy.	12. Raise awareness of the *Tower of London Local Setting Study 2010* among developers and decision makers.	12.1 Promote the *Tower of London Local Setting Study 2010* to developers when notifications of applications for developments are received and work with the GLA to raise the Study's profile with developers and local planning authorities. 12.2 Work with all concerned, and in particular the planning authorities and Historic England to promote the development of a design guide for the public realm.
	Issue - lack of interpretation of the wider setting. Opportunity – capitalise on the stakeholder engagement work started by the Tower Future Thinking strategy.	13. Seek to improve the quality and coherence of the Tower's local setting.	13.1 Work with responsible authorities and partners by contributing to short-term opportunities and developing long-term strategies to improve the quality and coherence of the Tower's local setting.
		14. Re-establish and interpret lost historic links.	14.1 Work with local museums and heritage organisations to re-establish and interpret lost historic links between the Tower, Thames and Liberties for example, to develop a common digital infrastructure to guide and inform the visitors approaching the area surrounding the Tower.
D. To sustain and promote the intangible assets	Challenge/opportunity – promoting the ceremonies and traditions of the Tower and the roles of the Tower community to a large and diverse audience, whose first	15. Ensure that the knowledge and practise of traditional ceremonies and events is maintained and demonstrated to as wide an audience	15.1 Define the 'associative attributes' relating to the ceremonies, traditions and myths of the Tower and

	language is predominantly not English.		as practical.	publicise to further inform how HRP sustains and promotes the intangible assets.
	Challenge – increased pressure on services and resources (as a result of increased visitor numbers) putting a strain on Tower Community accommodation and provisions.	16. Value and sustain the Tower's living community.	16.1 Review and improve the ways in which HRP promotes the traditions and ceremonies of the Tower as part of the Tower Core Story Project. 16.2 Over the next 5 years review the community accommodation and services provisions in order to develop a long-term strategy to dealing with increasing pressures placed on resources.
		17. Improve the promotion and integration of the Tower community's story in the interpretation of the site and increase access to areas that demonstrate the role of the Tower community.	17.1 Review the ways in which HRP tells the Tower community's story and the ways in which HRP engages with visitors through the Yeoman Warders tours. 17.2 Carry out the works necessary to make publicly accessible a historically significant Yeoman Warder's house (4 and 5 Tower Green).
E. To communicate the stories of the Tower and promote the OUV of the Tower through engaging and effective interpretation.	Opportunity – increased numbers of visitors on and off-site. Challenge – lack of coherent interpretation/narrative of the Tower's stories. Challenge – For a majority of visitors, English is not their first language.	18. Ensure that the stories of the Tower are communicated effectively to a wide and diverse audience.	18.1 Develop a coherent historical narrative and begin a programme of works to update and improve the interpretation of the Tower through the Tower Core Story Project. 18.2 Review the English language level of interpretation and adjust where necessary in order to reach visitors for whom English is not their first language. 18.3 Improve the learning

			experience and understanding of Tower history through a targeted programme and resource for families and young people.
	Challenge – recent changes in the national curriculum have meant that the stories of the Tower previously used in schools programmes need to be reviewed to ensure continued relevance to the national curriculum.		18.4 Complete the review of Tower schools programmes by the end of 2016, and make relevant changes in 2017/18.
	Opportunity – use the Tower's stories to make links between its history and the world today in order to demonstrate relevance in modern society and with the local community.	19. Deliver stories with impact and relevance.	19.1 Develop learning and interpretative programmes that demonstrate the relevance of the Tower's history with modern society in a way that encourages participation from a wider audience.
	Opportunity – new technology offers increasing ways to engage with visitors outside the Tower walls, through social media and digital engagement.	20. Develop means to communicate the Tower's stories beyond the Tower walls.	20.1 Develop digital and social media strategies within the Tower Core Story framework to extend reach beyond the Tower of London site.
F. To ensure the complete visitor experience is reflective of the Tower's WHS status.	Challenge – currently visitors find it difficult to navigate their way to the Tower entrance. Challenge – potential effects of Cycle Super Highway.	21. Improve access to the site and the start of the visitor experience from the Tower arrival points.	21.1 Develop an integrated signage strategy with Transport for London, London Borough of Tower Hamlets and Historic England. 21.2 Provide improved orientation and information to enable visitors to plan their day. 21.3 Promote, through cooperation with partners, a new crossing for pedestrians in front of Tower Hill tube station.
		22. Explore ways to solve the current issues with ticketing, queuing, security checks, physical entry to the site and interpretation of the	22.1 Roll out the HRP Visitor Experience Strategy (VESII) at the Tower in 2016/17. 22.2 In 2017/18 carry out the Middle

		causeway.	Tower Entry Project, which includes the Causeway re-surfacing and immediate signage and orientation improvements.
			22.3 Work with partners to unlock the barriers to our long-term solution for the Tower entry arrangements – for example, extending the Wharf access across the Pier.
	Challenge – limited capacity/ overcrowding in popular areas.	23. Increase physical capacity and improve visitor flow within the Tower walls.	23.1 Review interpretation of the site (through the Tower Core Story Project), to create a more coherent story and improved visitor flow.
			23.2 Explore the feasibility of opening up the moat to visitors.
			23.3 Explore the feasibility of and business case for allowing visitors access to the White Tower roof.
			23.4 Carry out a short-term programme to test and improve the visitor flow in the Jewel House.
	Opportunity – promote the OUV of the WHS on and off site.	24. Raise awareness of the Tower as a WHS.	24.1 Review the way HRP currently communicates the Tower's WHS status.

8.0 Mechanisms for implementation

8.1   This Plan sets out Historic Royal Palaces' objectives for managing the Tower and its setting: researching and understanding the Tower, promoting its significance, caring for it, communicating its stories, operating it for the mutual benefit of its visitors and residents and generating the money to make all this possible. These objectives will help Historic Royal Palaces to fulfil its cause and to ensure that the management of the Tower and its setting is appropriate to its status as a WHS.

8.2   Historic Royal Palaces is the lead body responsible for implementing the Plan, in co-operation with its on-site and off-site partners. The Plan provides the focus for co-ordinating this work; a significant level of continued commitment and resources are required to undertake it.

8.3   Implementation of the Plan will be integrated into the activities of Historic Royal Palaces and its planning and decision-making framework:

- Trustees' strategic guidance;
- Executive Board strategic planning process;
- Historic Royal Palaces' rolling three year Strategic Plan;
- Historic Royal Palaces' departmental Annual Operating Plans.

8.4   Each year specialist plans, such as the Management Plan, inform the content of departmental Annual Operating Plans in a process lasting from October to March. Actions and activities in Annual Operating Plans have budgets and resources allocated to them and this is, therefore, the principal mechanism for the implementation of many of the World Heritage Site Management Plan objectives and actions.

8.5   The Tower of London World Heritage Site Consultative Committee (the Committee), a group including on-site partners, local authorities and heritage specialists, provides a forum for consulting on issues affecting the Tower and its environs.

The Committee comprises representatives from:
- Historic Royal Palaces – Trustees, the Resident Governor, Conservation &

Learning Director and World Heritage Co-ordinator;

- Royal Fusiliers;
- Royal Armouries;
- Royal Collection Trust;
- Historic England;
- Department for Culture Media and Sport;
- Greater London Authority;
- London Borough of Tower Hamlets;
- London Borough of Southwark;
- City of London Corporation;
- ICOMOS-UK.

8.6   In addition to the above, specialists and representatives of other relevant interested parties will be invited to participate in Committee discussions as and when appropriate. The Committee will review progress on the various objectives and assist in monitoring implementation of the action plan.

9.0 Monitoring and reviewing the Management Plan

9.1   The Tower and its setting are dynamic, part of a constantly evolving World City. The Plan and the mechanisms for monitoring and reviewing it therefore need to be flexible.

9.2   The Plan is the policy of Historic Royal Palaces, which is responsible for monitoring and reviewing the actions that it contains. Within Historic Royal Palaces, the Conservation & Learning Director is responsible for ensuring their implementation. This is achieved by:

- the World Heritage Co-ordinator monitoring activity in relation to the Plan and formally reporting progress against actions annually to the Historic Royal Palaces' Executive Board and Trustees (Responsibility - Conservation & Learning Director);

- monitoring relevant actions in the Annual Operating Plans of Historic Royal Palaces and its specialist departments (Responsibility - Conservation & Learning Director);

- holding partnership meetings with on-site partners – Royal Collection Trust, Royal Armouries, Royal Fusiliers, Ministry of Defence (Responsibility – Resident Governor);

- assessing the effectiveness of the supporting actions in achieving the Plan's objectives and reviewing the overall direction of the Plan in response to changing priorities and needs (Responsibility - Conservation & Learning Director);

- annual review of the implementation of the Plan with the Tower of London World Heritage Site Consultative Committee (Responsibility – World Heritage Co-ordinator);

- consultation with Tower of London World Heritage Site Consultative Committee on issues relating to the immediate vicinity of the Tower, as and when required (Responsibility – Conservation & Learning Director);
- formally reviewing the entire Plan every five years in consultation with the

Tower of London World Heritage Site Consultative Committee. (Responsibility - Conservation & Learning Director);

- working with partners to ensure that they adopt the Plan where appropriate (Responsibility – Conservation & Learning Director).

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This is a selected bibliography which broadly represents the format and content of the Management Plan. A more extensive list of historical sources related to the Tower and its environs may be found in the Conservation Plans for the Tower which are available from Historic Royal Palaces.

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Appendix A - Historical development of the Tower

1.   A brief synopsis of key events is provided below as an introduction to the historical development of the Tower and its environs, schematically represented in Figure 2 below. A more detailed description can be found in the appendices of the Conservation Plans.

Figure 1: Schematic representation of the development of the Tower

	Late 11th Century
	12th Century
	Henry III (1216 – 1272)
	Edward I (1272 - 1307)
	Edward II (1307 – 1327)
	Edward III (1327 – 1377)
	15th Century
	16th Century
	17th Century
	18th Century
	19th and 20th Centuries
	21st Century
	Moat
	River Thames
–·–	Buried or destroyed buildings
– –	Position of Roman Wall

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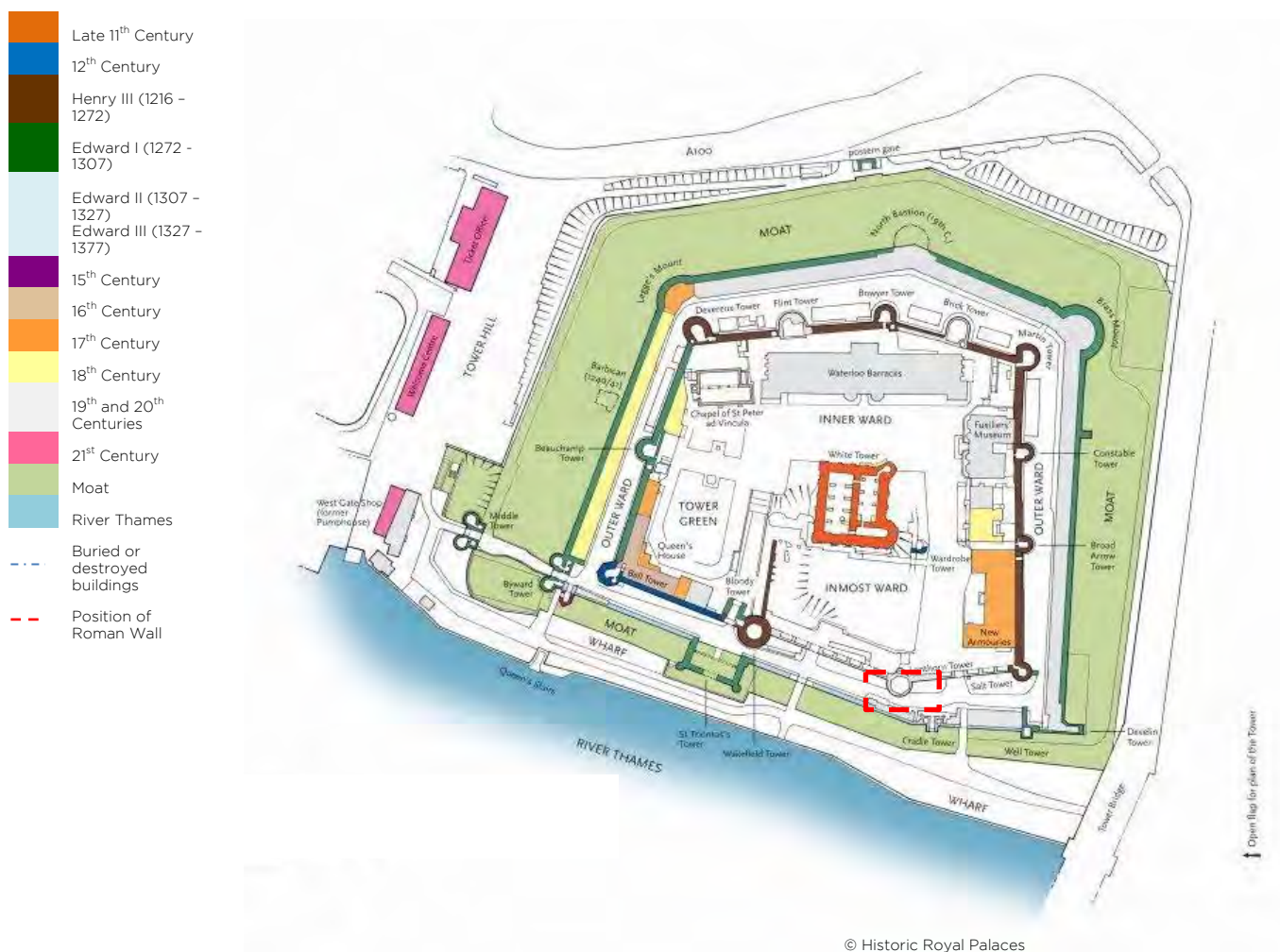
2.   The historic assets making up the Tower have been investigated and considered individually. In addition to the built environment, tree planting and gardening have been recorded at the Tower from the mid-13th century until the present day, and this synopsis also refers to major developments in landscaping.

Figure 2: Illustration of the Tower showing key features

The numbers on the plan are those referred to in the following sections.

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Prehistory

3. Limited evidence for the use of the site during the prehistoric period has been discovered during 20th-century excavations. Excavations in the Inmost Ward in 1955 and 1976 discovered prehistoric pottery shards and flint flakes, and the remains of a human male burial, dating to the Iron Age, was discovered close to the Lanthorn Tower during an excavation in 1976. No firm evidence of a major settlement as a precursor to the Roman City of London has been discovered, however, and the likelihood is of a settled, but rural, landscape prior to the first century AD, which is evidenced from archaeological excavations in the City of London and its environs.

The Roman period

4. The site came into settled use during the late 2nd century, although Londinium had been established *c*AD 43. Elements of the Roman use of the site can be seen to have affected later developments. Archaeological excavations have shown that William the Conqueror's White Tower was constructed on the site in two phases of timber-framed buildings and a more substantial stone building possibly of some status. William's 11th-century castle utilised the south-

east angle of the Roman city and riverside walls, using them as the eastern and southern limits of the fortress until the 13th century. These riverside walls were added in the second half of the third century, and it is likely that they were built as a response to the threat of a seaborne attack. Excavations in the 1970s discovered that the earliest Roman walls on the site were supported by oak piles, and dendrochronology has suggested that the walls were constructed between AD 255-70. It was around this time that the threat of Saxon seaborne attack was acute, during the 14-year separation from the control of the Roman authorities after the usurpation of Postumus in 259. The Lanthorn, Wakefield and Bell Towers may be sited on the remnants of Roman bastions along the riverside wall. The archaeological remains of surviving Roman features within the Tower form an important class of asset of the site. The line of the eastern Roman wall is marked in the lawn parallel to the east elevation of the White Tower, and corresponds with the huge scheduled section of wall which still survives above ground, on display east of the exit from Tower Hill Underground Station. An element of riverside **Roman Wall [1]** is exposed as part of the display at the Tower and dates to a rebuilding phase in the late 4th century. Coins from the reign of Honorius (395-410) were found during excavations near the Lanthorn Tower in 1777, indicating that the Tower site remained in occupation up until the last years of Imperial control.

The south-east corner of London, the Roman wall, and site of the future Tower of London as it might have looked in AD 400. Drawing: Ivan Lapper.

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Post-Roman and Anglo-Saxon

5.   Evidence for the continued use of the site after Roman withdrawal is almost non-existent. The major settlement activity of the early Saxon period was west of the city in the Lundenwic area of the Strand, and extensive re-occupation of the walled area took place only in the late Saxon period, initially focused around

Queenhithe. The earliest evidence for settlement in this south-east corner of the walled city is the foundation of pre-Norman churches and the division of land into administrative areas. In the Second World War, bombing on Tower Hill revealed a Saxon doorway arch, probably dating to the 8th century, at the Church of All Hallows, Barking. It is thought probable that the church of **St Peter ad Vincula [2]** was founded during the 9th century.

The Conqueror's castle

6.   Shortly after defeating the Saxon King Harold Godwinson at the Battle of Hastings in 1066, and his hurried Coronation on Christmas Day in Westminster Abbey, Duke William of Normandy, otherwise known as William the Conqueror, needed to subdue the rebellious citizens of London. To this end, he planted the Tower in the south-east corner of the walled city in order to provide a firm base from which to secure and maintain control over the city. The Tower was one of three London fortifications built just after the Conquest, and was close to that built at Baynard's Castle to the west. Mountfitchet's Castle was to the north, close to Ludgate Circus. The siting of the castle took advantage of the ready-made defences of the Roman city walls at their south-eastern corner. This strategic positioning of what was to become one of the most formidable of William's fortresses, on the edge of the Thames, acted as a deterrent to any potential invaders travelling up river. The details of William's initial fortification are unknown, but its extents are thought to broadly correspond with the Inmost Ward, with the surviving Roman city and riverside walls defending the east and south sides and a new rampart, ditch and timber palisade defining the west and north extents.

7.   The **White Tower [3]** was begun in the mid 1070s and completed *c*1100. This magnificent stone keep would have towered over the surrounding wooden constructions of the city, and no doubt added to the impression of strength already created by the substantial remains of the Roman walls. Built largely of limestone from Kent, with Caen stone dressings shipped from Normandy, the White Tower took about 30 years to complete. Towards the end of the reign of William Rufus, the Conqueror's son, it was finished well enough to hold the imprisoned Bishop of Durham, Ranulf Flambard, in 1101. This is the first well known episode of the Tower having been used as a prison for important offenders against the State. Tree ring-dating of wooden features within the White Tower tell us that building was well underway in the 1080s, and geological and archaeological research indicates that there was a substantial pause and a change

in the masonry of the building during construction. The Conqueror and his descendants required an imposing and impregnable fortress to quell the inhabitants of the city and deter invaders, and archaeological evidence suggests that the exterior elevations were substantially taller than required for the number of interior storeys. Originally only three storeys high internally, including a basement, a fourth storey was eventually added to the White Tower in the 15th century. The chapel was an exception, and had a gallery with a roof at fourth storey level. The exterior of the White Tower was actually built to appear as if it contained four storeys. This piece of architectural propaganda certainly worked throughout subsequent centuries: as the White Tower aged, it became associated with an earlier conqueror of the Britons – Julius Caesar. The Chapel of St John the Evangelist – one of the most elegant and complete 11th-century palace chapels to survive anywhere – is evidence that the great Keep was also intended to house and to facilitate monarchical worship on the brief occasions when the king and his retinue stayed at the Tower. Recent research suggests that the layout of the White Tower is ultimately derived from that at Ivry-la-Bataille in Normandy. The situation, design and proportions of the White Tower contributed enormously to the development of the 'great tower' as a type, providing a prototype for many more in Britain and Europe.

The castle viewed from the south west, as it might have looked in the 1070s, while the White Tower was in the early stages of construction. Drawing: Ivan Lapper.

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The 12th century

8.   Although documentary sources provide evidence for alterations within the Tower during the reigns of Henry I (1100-35) and II (1154-89) and during the civil wars of Stephen (1135-54) and Matilda, the specific buildings and building programmes are not clear and cannot be identified structurally or archaeologically, although the royal palace was first established in the Inmost Ward in this period. The **Wardrobe Tower [4]**, of which only a fragment now survives, may date from this period and incorporates Roman material.

9.   The fortress was expanded to the west during the reign of Richard I, under the direction of his chief minister William Longchamp, Bishop of Ely. Richard himself spent most of his reign fighting in the Holy Land, leaving his minister to manage affairs at home. The accounts of 1190 show major expenditure for building works during Longchamp's time as Constable, and the polygonal shape of the magnificent **Bell Tower [5]** suggests that it was built by 1200. Comparisons with similar towers at Dover, Corfe and Framlingham castles support this date. The Bell Tower was part of the newly defined south-west corner of the fortress, and connected with a new riverside curtain wall, which linked with the defended enclosure of the Inmost Ward. A surviving length of this new wall now stands as the **Inner Curtain [6]** between the Bloody and Bell Towers. A new length of moat was excavated around this western expansion, with the main gateway on the site of the later Beauchamp Tower. A contemporary chronicler, Roger of Howden, states that Longchamp 'caused the Tower of London to be surrounded by a moat of great depth', although a 13th-century chronicler, Matthew Paris, noted that the Thames had failed to flood the moat.   Longchamp's incomplete defences were soon to be tested, as the King's brother John attacked the Tower in 1191. The defences held, but Longchamp was forced to surrender for lack of supplies. John became King in 1199, and stayed often at the Tower.

Reconstructed view from the south-west, on the completion of the new defences, in about 1200. Drawing: Ivan Lapper.

The 13th century: John and Henry III

10.   Accounts suggest that a royal menagerie was first established at the Tower during King John's reign (1199- 1216). In 1215, John issued Magna Carta under pressure from rebel barons who had seized London and the Tower. If John implemented Magna Carta, then the Tower would be returned to him. John reneged, leading his opponents to invite Prince Louis of France to invade, and for a period the prince had control of the Tower. When John's young son Henry III (1216-72) came to the throne, the French were defeated within months, and the Tower reclaimed for its monarch. Shortly after, the royal apartments at the Tower underwent a major period of rebuilding and additions, and a refortification followed. The first building programme commenced in the mid 1220s, with the **Wakefield Tower [7]** as part of the King's accommodation and also the **Lanthorn Tower [8],** probably built for the Queen. The Tower's Great Hall, constructed in the 1230s in the Inmost Ward, no longer survives, but observation of the still extant and contemporary Great Hall at Winchester Castle gives a good indication of what it once looked like. The first phase of the **Bloody Tower [9]** as the water gate dates from this period too. The now ruinous **Main Guard Wall [10]** and **Coldharbour Gate [11]** date from the 1230s, and were part of the strengthening of the Inmost Ward.

11.   The second major works programme, underway by 1240, saw the expansion of the castle beyond the boundaries of the Roman wall, to the north and east, and the refortification along these expanded lines. The expansion brought the church of St Peter ad Vincula and its graveyard into the castle. This phase of building was prompted by Henry's flight to the Tower in 1238 during unrest provoked by his sister's secret marriage to Simon de Montfort. The existing defences were

considered inadequate. It was also during this refortification that the first recorded instance of the White Tower being whitewashed took place. Some sections of the original walling from these external defences now survive as the **Inner Curtain Wall [12].** The wall was reinforced by massive D-shaped towers including the **Devereux Tower [13], Flint Tower [14], Bowyer Tower, [15] Brick Tower [16], Martin Tower [17], Constable Tower [18], Broad Arrow Tower [19]** and **Salt Tower [20].** A moat was excavated on the external side of the wall, currently the Outer Ward. An impressive entrance complex, probably consisting of an outwork turret, a timber bridge and a great gatehouse, was built to face Tower Hill. Unfortunately, it collapsed, possibly twice, during the latter stages of construction: the exact cause of the failure is unknown. Archaeological excavations in the western moat in 1995 uncovered the alarmingly sloping stone base and associated timbers of a building which formed a forward defence in Henry III's western entrance. Comparison of the stonework with the shape of similar buildings at Dover and Kenilworth castles suggested that the 'forework' had an elegant polygonal superstructure. The great gateway itself must have been built into the curtain wall and stood roughly on the site of the present Beauchamp Tower. Matthew Paris described the collapse of this entrance as taking place in 1240, and described a prophecy by St Thomas Becket (the patron saint of London) that the walls would collapse once more, and it seems that indeed they did. This story reflects the city's mistrust of the King, and gives context to Henry's reinforcement of his massive fortress. Like his father, Henry had a troubled reign, and frequently resorted to the Tower during his conflicts with powerful magnates, including the rebellion led by his brother-in-law, Simon de Montfort in 1263. Again, the Tower's defences held firm, but the King had to submit due to the castle being poorly provisioned.

12.   In March 1262, Henry III gave instructions for planting 'cailhou' pear trees in a walled enclosure outside the castle, but inside the city walls. This orchard was known as 'The King's Garden'. It is likely that it lay on the north side of the Tower moat on a property later to be known as the 'Nine Gardens', which remained at least until the 16th century. Another royal garden, this time within the castle walls, first appears in documents of 1266, with an order to buy plants and to repair a wall around 'The King's Garden in the Tower of London'. It is most likely that this was located at the south-east corner of the castle, and came to be known as 'The Privy Garden'. It occupied a triangle between the Lanthorn Tower, the Cradle, Salt and Well Towers.

Reconstruction of the Tower immediately before the collapse of the western entrance of 1241. Drawing: Ivan Lapper.

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The 13th century: Edward I

13.   Edward I (1272-1307) quickly embarked on a building programme which dwarfed that of his father. Between 1275 and 1285, he expanded the Tower in all directions, defending the increased area with the Outer Curtain Wall and moat. Lengths of this curtain wall survive as the **Outer Curtain Wall [21]**. It is thought that the wall was originally relatively low with the main defences continuing in Henry III's curtain wall. **Legge's Mount [22]** was constructed as the north-west angle tower. Built as part of the curtain wall, it originated as an open-backed structure with arrow loop gallery. The main landward entrance was constructed at the south-west corner with the elaborate, moated, entranceway of the **Lion Tower Gate and Drawbridge [23], Middle Tower [24]** and the **Byward Tower [25]** and **Postern [26]** connected by the **West Causeway.[27].** At the south-east corner of the Outer Curtain Wall, a further landward gateway to the fortress was facilitated and guarded by the **Develin Tower [28]**. The **Well Tower [29]** also dates to this building programme. Edward also defined the limits of the shape of the moat as it appears today. Supervised by the Flemish Master Walter, and completed by 1281, the new moat was at least 50m wide, and many metres deep at high tide. Edward's sluicing was successful, and for the first time the moat at the Tower functioned properly.

14.   The expansion of the castle to the south had involved the reclamation of land from the Thames leaving the previous riverside Wakefield Tower and Bloody Tower water gate landlocked. This feat was achieved by masses of beech wood piles being driven into the riverbed, supporting the Outer Ward and Outer Curtain Wall.   **St Thomas's Tower [30]** was built from 1275 as the replacement for the former river gate and to provide new royal accommodation above in the form of a

hall and chamber for the King's personal use, with a communicating bridge to Henry III's Wakefield Tower. This expansion provided additional accommodation within the fortress and it is probably at this time that the Royal Mint was first established in the Outer Ward.

15. The **Beauchamp Tower [31]** was constructed *c*1281 following the collapse in 1240 and 1241 of the former main entrance of Henry III on the same site. The lengths of Inner Curtain Wall around the tower were also rebuilt and survive as material largely from this date. These constructions represent the first major use of brick in the fortress, with brick used as a lining for the archers' embrasures and as the interior skin of the main rooms in the tower. They also represent the first large scale use of brick in England since the Roman period, with 243,000 being ordered between 1276 and 1278. Lastly, the church of St Peter ad Vincula was completely rebuilt between 1286-7.

16. By ringing his father's castle with an outer ward, curtain wall and a moat, Edward had transformed the Tower into one of the most formidable concentric castles in Europe. Responding to Gilbert de Clare's castle at Caerphilly, built in the late 1260s, the Tower was part of a group of innovative and sophisticated castles built on Edward's orders. His castles in North Wales, built to secure the conquest of the Principality, form another WHS.

Still from a virtual reality reconstruction of the Tower *c.* 1300, showing the formidable new western entrance and a completed moat.
Reconstruction: Thomas Lisle.

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The Late-Medieval Tower

17. The Tower gradually changed from being a royal residence to being a place used by administrative departments for storage. With the growth of administrative bodies such as the Privy Wardrobe (with increasing ordnance activity) and the Mint, the fortress became an armoury, arsenal and store, mint, record office, menagerie, prison, military fortress and place of royal refuge in times of emergency, such as the War of the Roses. Documents make it clear that

houses within the Tower were granted to officers of the various administrative bodies. This pattern of use resulted in the limited upgrading of the Tower's defences and the improvements that were carried out were done so on an ad hoc basis; such as the **Brass Mount [32]** constructed *c*1300. Strengthening of the curtain walls was undertaken in Edward II's reign (1307-27), and continued under Edward III (1327 –77), when the Outer Curtain Wall was raised to its current height in the 1330s, and the **Cradle Tower [33]** constructed in 1348-55. Edward II and Edward III also updated and repaired the Byward Tower Postern. Both of these monarchs spent a considerable amount of time at the Tower, and Edward III elaborately extended the Bloody Tower, adding a beautiful vaulted passageway, and luxurious accommodation with a tiled pavement floor. It was during this period that the earliest evidence for a Constable's Lodging on Tower Green first appears. Fine stone walls and doorways still survive in the basement of the present Queen's House. Edward III and his grandson Richard II (1377-99) had some of the Tower's interiors richly decorated, and a magnificent 14th-century wall painting of the Crucifixion with Saints still survives in the Byward Tower.

Figures of St Michael and Saint John the Evangelist on the 14th century mural painting in the Byward Tower.

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18.   Due to the Tower's increased role as a military storehouse and supply depot, **The Wharf [34]** was constructed in three main stages *c*1276-1324, 1338 and 1389-91, with Tower Dock, infilled in the 1950s, at its west end. The **South Moat Revetment Wall [35]** is formed by the northern side of the Wharf wall and therefore partially dates from this period. The 1338 extension of the moat anticipated the demand for supplying English forces abroad for the Hundred Years War with France, which started in 1340. The building constructed against the east face of the White Tower, possibly by Edward III during the mid-14th century, may be related to the evolution of the Privy Wardrobe and the use of the

Tower as a military storehouse. This was demolished in the 19th century.

19.   Excavations in 2004 discovered the complex archaeology of the eastern end of the Wharf, uncovering the remains of 15th-century cellar walls and the rubble build of the wharf extension commissioned by the great poet Geoffrey Chaucer (author of *The Canterbury Tales*), who also happened to be Richard II's Clerk of Works at the time. Documentary evidence tells us that this end of the Wharf was built during his clerk-ship, and that cannon foundries were constructed on it in the following century. The Tower was the setting for some of the most tumultuous episodes in English history during Richard's reign. The Tower was, once more, poorly garrisoned during the Peasants' Revolt of June 1381, when a rabble stormed the Tower, encountering no resistance. The King's mother was insulted in her bedchamber, and his chancellor dragged out onto Tower Hill and beheaded. In 1399, Richard was forced to abdicate and hand over his crown to his cousin, the future Henry IV (1399-1415). The deposed monarch was held at the Tower before being taken to Pontefract castle, where he died shortly after.

20.   During the Wars of the Roses, Edward IV (1461-83) extended the western entrance defences by building an enormous brick **Bulwark [36]**, which now survives as an archaeological structure beneath the paving of southern Tower Hill. It was probably in Edward IV's reign that the wedge-shaped Byward Tower Postern was rebuilt as the one which still survives today, complete with very early examples of loopholes for small cannon and handguns, responding to developments in the use of artillery in warfare. During the dynastic struggle between the royal houses of York and Lancaster, the Tower played host to the victory celebrations and probable murder of Henry VI (1422-61), and the notorious disappearance of the incarcerated sons of Edward IV, the 'Little Princes' in 1483, after the usurpation of the throne by their uncle Richard III (1483-85.) This episode was immortalised by Shakespeare, in his play *'Richard III'.*

The Tudor Tower
21.   Henry VII (1485-1509) and Henry VIII (1509-47) carried out some strategic building work mainly in the form of repair and modernisation, although some new building associated with royal accommodation was undertaken. The privy garden is referred to in documents from the reign of Henry VII. Henry built a wooden gallery along a stretch of the castle wall providing a view over the gardens on either side. The garden to the north of the gallery was larger than that to the south and was referred to as the Wardrobe Garden. The accounts also make

reference to the 'Queen's Garden'. These gardens and the gallery no longer survive, although archaeological investigations in the New Armouries building below ground level in 1997-2000 revealed traces of earlier 14th-century walls associated with the garden's location. Archaeological excavations in the mid 1990s revealed fragments of the Tudor wall. The top storey of the White Tower was added in 1490, early on in Henry VII's reign. Tree ring analysis has confirmed the dating of its magnificent roofs.

22. Accounts from the 1530s demonstrate that a repair programme was initiated in Henry VIII's reign following a survey of the condition of the Tower. Repairs were carried out to both Inner and Outer Curtain Walls and the mural towers, the White Tower and St Thomas's Tower. James Nedeham, Henry VIII's Master Carpenter, was awarded the contract for constructing the new roof of St Thomas's, built strongly enough for the deployment of cannon on its surface. Much of these works took place prior to the Coronation of Anne Boleyn, Henry's second, and Protestant, Queen in June 1533. The Tower needed extensive repair and redecoration to make it fit for a brief royal residence, and most of the work focused on the royal apartments, which now no longer exist. They can, however, be seen on a survey dating from 1597, carried out towards the end of Elizabeth I's reign (1558-1603). Henry and Anne stayed in the apartments before the Queen's Coronation, and Anne created 18 Knights of the Bath in the Great Hall, after their vigil in the White Tower. Following centuries of tradition, Anne then processed from the Tower to Westminster Abbey, there to be crowned. The origins of this tradition are uncertain, but it ended with Charles II (1660-85.) Ironically, years later, Anne Boleyn, her cousin Catherine Howard, and her daughter the young Princess Elizabeth (later Elizabeth I) were imprisoned in the royal apartments on separate occasions. The church of St Peter ad Vincula was destroyed by fire in 1512 and the present building was constructed as its replacement c1519-20. Henry VIII and his first wife, Katherine of Aragon, attended services there and processed from it. After their executions on Tower Green, the bodies of Henry VIII's wives Anne Boleyn and Catherine Howard were buried there. The body of the Protestant 'Nine Day Queen', Lady Jane Grey, is also interred there – a victim of Henry's daughter Mary Tudor's (1553-58) determination to return the nation to Catholicism. The **Queen's House [37]** was built in 1540 incorporating pieces of the former Constable's Lodgings, and is the finest timber-framed building to survive the Great Fire of London of 1666.

23.   During the reigns of Henry VIII, Edward VI, Mary and Elizabeth the fortress gained importance as a military emplacement (with the increased use of artillery – such as the placement of cannon on the roofs of major buildings), armoury and arsenal and prison for "religio-political" prisoners. Many towers, especially the Beauchamp and Salt Towers, have inscriptions carved into their walls by prisoners, and are a permanent reminder of many of the illustrious names who were incarcerated for their beliefs. After Anne Boleyn's Coronation, Henry VIII rarely if ever stayed at the Tower, preferring Hampton Court and Whitehall Palaces. The same is true of his children, and, while royal residence became a thing of the past, the Tower's role as a functional building and a symbol of monarchical control gained strength.

24.   A great series of Ordnance Storehouses was built in Henry's reign, to the north of the Inner Ward. What is now used as a crypt for the chapel of St Peter ad Vincula, and the huge stone doorways in the wall shielding the courtyard beneath the Devereux Tower are the last surviving parts of these huge buildings. Institutional use of the fortress continued, but royal residential use declined so much that by the time of Elizabeth, if not before, parts of the royal lodgings were roofless and in ruins.

25.   The eastern edge of what is the current south lawn in front of the White Tower was cut by the Tudor royal apartments, which, from the building and repair campaign of the 1530s, stretched between the Lanthorn Tower and the Wardrobe Tower. Tower Green proper probably started as a grassed area and extended from St Peter ad Vincula as far as the Queen's House, and all along the north side of the inner ward of the castle. The building of the Ordnance Storehouses defined the northern edge of what was to become the modern day Parade Ground. In the 16th century, the Old Main Guard (now demolished) was built to the south-west of the "Execution Site" area. A walled garden in the south-east part of Tower Green was known as the Lieutenant's Garden in the 16th century. It was overlooked by the Bloody Tower, which was previously known as the Garden Tower.

Still from a virtual reality reconstruction of the Tower *c*1540, showing the late medieval extension to the Wharf, the Ordnance stores to the north, the addition of the Tudor royal lodgings in the Inmost Ward and Edward IV's Bulwark, on Tower Hill. Reconstruction: Thomas Lisle.

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The Stuart Tower

26.   During the reign of James I (1603-25), the Tower saw its last use as a royal residence, although the King often visited to watch dogs fight wild animals in the Menagerie. The Tower's purpose as prison and store came to dominate, with the medieval Great Hall being re-roofed for conversion as an Ordnance store. James' reign saw some of the most famous prisoners interned, including Sir Walter Raleigh and the Gunpowder Plotters. The restoration of the White Tower's window and door dressings in Portland stone began in Charles I's reign, in 1636-7, following repairs to the Wharf. During the Civil War, the Tower was strongly garrisoned for the Parliamentarians, though few records survive of works associated with it (such as provision of powder stores). Domestic architecture surviving from the 17th century includes parts of **7 Tower Green [38]**, while the brick houses of **4 and 5 Tower Green [39]** may have been built around the middle of the century.

27.   After the Restoration, during the reign of Charles II, steps were taken to improve the state of the Tower's defences and military storage areas. In 1663, a royal warrant was issued for the construction of a new military storehouse, the **New Armouries Building [40],** on the site of the Wardrobe Garden. A fire corridor was cleared around the White Tower, at about time of the Great Fire of London in 1666, following fears that the powder magazine would ignite. During this clearance, much of the medieval palace was destroyed including Coldharbour Gate, the Jewel House on the south front and parts of the royal lodgings on the eastern side of the Inmost Ward. Extensive archaeological excavations took place in this location in the 1950s and 1970s, revealing remains dating from amongst the earliest periods of habitation of the site. Ordnance storage buildings then replaced the palace south of the White Tower.

28.   The Tower was used for a very brief time as the first Royal Observatory when John Flamsteed was permitted to set up his telescope in the north-east turret of the White Tower. The defences of the moat were improved by Sir Bernard de Gomme in 1670-83, who built the **North and West Moat Revetment Wall [41]** in brick. Finally, the Grand Storehouse (subsequently burned down in 1841) was constructed, replacing Henry VIII's range of now ruinous stores in 1688-91.

29.   In 1607, the Lieutenant of the Tower restored the 'Nine Gardens' on the north side of the Tower moat with a brick wall and a Banqueting House at the end of it.

By 1620, the ditch surrounding it had been filled, and yards and gardens clustered around it. A plan of the Tower made in 1681-2 shows that the Privy Garden area had by then lost its function as royal pleasure garden and was occupied by stables, storage areas, and gun platforms. The north-east garden, in the Inner Ward, is only visible on a 1681-2 plan of the Tower, and no longer exists. On Tower Green, the 17th-century New Main Guard was built to the north-east of the Execution Site area. The walled Lieutenant's Garden remained for most of the 17th century, but was converted into part of a large parade ground in 1685. The Upper and Lower Gardens, with associated walls, occupied the remainder of Tower Green. The southern part of the gardens formed a small orchard, and trees were gradually added from the late 17th century.

The 18th Century

30.   Changes at the Tower during this period were relatively few and continued to be dominated by the various offices. Between *c*1700 and 1720 **2 Tower Green [42]** was built as the residence of the Tower doctor and in 1718-19 the **Hospital Block [43]** was built as two houses for officials of the Ordnance. In 1749, **1 Tower Green [44]** was constructed as a replacement residence for the Chaplain and 7 Tower Green is also thought to date from the 17th/18th centuries. Other buildings were constructed in this period, but were demolished in the second half of the 19th century. These included a guard house on the western side of the White Tower and the Irish Barracks in the Outer Ward.

31.   Two fires, in 1774 and 1788, destroyed the remaining medieval palace buildings. Shortly after the fires, the remains were demolished and replaced with very substantial new offices for the Ordnance and storehouses. The buildings lost at this point included the Great Hall, the Lanthorn Tower, the Tudor gallery towards the Salt Tower and what remained of the southern Inner Curtain Wall.

32.   During the late 18th century, the western arm of the Outer Ward – long associated with the Royal Mint - was extensively rebuilt with the construction of the current Casemates (**1-3 Casemates** , **4 Casemates**, **4a-5 Casemates**) **[45]**, now forming the sole surviving parts from the modernisation of the Royal Mint.

33.   A survey of 1726 shows a line of trees planted to the east of the White Tower. On the whole, the 18th-century landscape continued along the lines of the previous century.

Reconstruction of the Tower viewed from the north-west, *c.* 1700. The Grand Storehouse, the Mint in the Outer Ward, and the Ordnance buildings in the Inner Ward can all be seen. Drawing: Ivan Lapper.

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The 19th century

34.   During the 19th century, the defensive aspect of the Tower reduced in importance and the Offices that had dominated its evolution for the last century moved out to be replaced in importance by the growth in organised tourism. Visitors had been able to pay to see around the Tower since the 16th century, but the regularisation of this privilege had to wait until the social reforms of the 19th century. Meanwhile, the Tower still continued as a garrison with increased pressure on accommodation.

35.   In 1812, the Royal Mint moved out of the Tower, followed by the Royal Menagerie from the 1830s onwards. The Ordnance and the Record Office left the Tower during the 1850s. In 1841, the Tower suffered a large fire which did much damage. It destroyed the Grand Storehouse completely. The site was later built upon in 1845 by the **Waterloo Block [46]**, originally a barracks for over 1,000 men. Accommodation for officers was provided in the nearby and contemporary **Royal Regiment of Fusiliers (London) Museum [47]**. Further accommodation was provided in the brick single-storey structures **7-10 Casemates [48]**, constructed in 1853, with **Salvin's Casemates [49]** in the north-east and east arms of the Outer Ward, constructed *c*1856.

36.   The two sets of 19th-century Casemates are the physical embodiment of the changing philosophy towards the Tower and its evolution. The earlier range was built in brick with classical references. The later, however, was the direct result of a campaign led by the architect Anthony Salvin, with support from the Prince Consort, to 're-medievalise' the fortress. This campaign built upon the Victorian fascination with the Tower's gruesome reputation, and the concurrent transformation of the fortress into a venue for mass tourism. The Tower's history

inspired historical novelists such as W. Harrison Ainsworth, and history painters such as Paul Delaroche, who revelled in the more dramatic episodes in the castle's past. Salvin's first commission at the Tower was the restoration in 1851-3 of the Beauchamp Tower, with its strong associations with imprisonment. He was meticulous in his recreation of Edward I's great building. It was the success of this commission that led Prince Albert to press for the continued restoration of the medieval appearance of the Tower.

37.   The 19th century saw the most dramatic period of restoration carried out under the control of Salvin and his successor John Taylor. Much of the earlier 17th- and 18th- century brick repairs and sash windows were replaced by stone elements in the approved Gothic revival style. Most of the buildings were subject to some degree of restoration. St Peter's Church was gutted of 17th- and 18th-century furniture and refloored. The Chapel of St John the Evangelist's windows in the White Tower were replaced by Bathstone 'romanesque' versions. The Crown Jewels, a huge draw for tourists since the 17th century, were removed from the Martin Tower to new displays in the Wakefield Tower in 1870, and Salvin replaced the medieval floor with a reinforced version to support the weight of the Jewels' display.

38.   The reduced importance of the defensive aspect of the Tower was demonstrated with the draining of the moat in 1843 on the orders of the Duke of Wellington, Constable of the Tower from 1826-52. However, due to fears of Chartist riots, the North Bastion (later destroyed) was constructed for additional defence in 1848. Other reconstructions of the defences during this period included the Flint Tower and Brick Tower, and adjacent lengths of the Inner Curtain Wall. Many buildings were demolished in a general clearance of the interior. These included various post-medieval structures, but also older buildings thought to be in poor condition. The eastern annexe of the White Tower, thought to date to the reign of Edward III, was a most unfortunate loss, though fragments of the Wardrobe Tower were saved. The adjacent Horse Armoury was also removed. In an unpopular attempt to increase the 'medieval' character of the Tower, Taylor removed the 17th-century Ordnance Offices and Record Office along the southern inner curtain wall, and replaced them with a 'Gothic' inner ballium wall. Sadly, some of the medieval fabric was lost along with the fine architecture of the 17th century. This was the subject of a celebrated dispute with the newly created Society for the Protection of Ancient Buildings, who protested that the authentic original buildings had greater value than a recreated 'medieval style' new

construction.

39. Between 1866 and 1869, **8 Tower Green [50]**, designed by Salvin, was constructed as a domestic building. Various new service buildings appeared, including the **Yeoman Warders' Club [51]** and the **Cradle Tower Toilets [52]**, and the **Pump House [53]** and **Wharfinger's Cottage [54]** outside the Tower. The major change to the Tower setting was the opening of Tower Bridge, when the red brick and cast iron construction of Tower Bridge Approach replaced the earlier **East Moat Revetment Wall [55]**.

40. As the Tower's defensive role declined in the 1840s, the area to the north of de Gomme's moat revetment wall was transformed into a quasi-municipal formal garden. The current layout of Tower Green was created in the 19th century and an avenue of trees was planted on the parade ground in 1857. In 1866, the area immediately to the south of the church of St Peter ad Vincula was railed off and a granite and brass plaque was installed commemorating the execution of Anne Boleyn. It has been known as the 'Scaffold Site' or 'Execution Site' ever since. By 1870 the whole of Tower Green was covered in irregular cobblestones. The London Plane trees on the south lawn and in the cobbled area to the north of the Lanthorn Tower were planted in the 19th century, and still remain. In the late 19th century, a group of trees was planted at the eastern end of Water Lane and, by 1800, two trees were planted opposite the Wakefield Tower. The wharf was cleared of buildings in 1878 and Planes were planted when it was laid out as a public esplanade. Many of these trees still remain.

The 20th century

41. The century was marked by the growing importance of the castle as a tourist attraction and the diminishing role of the Tower as a military store. During the Second World War, however, the military use of the Tower came to the fore with its use as a Prisoner of War Processing Centre primarily for captured U-Boat crews. Rudolf Hess was the Tower's most famous prisoner at this time, although he only stayed for four days in the Queen's House. The White Tower was used as a gymnasium and mess for military personnel, and a Women's Royal Air Force unit maintained a barrage balloon in the moat. Some bomb damage was sustained by buildings at the Tower, including the total loss of the North Bastion, the northern half of the Hospital Block and the Main Guard. The buildings in Mint Street were also hit and had to be partially rebuilt.

42.   Tourism came to dominate the Tower in the later 20th century. New building has been on a minimal scale, with additions limited to structures such as the **Roman Wall Shop [56],** Pass Office and Beauchamp Toilet Block. Areas of the castle were altered for visitor displays. The philosophy of conservation at the Tower also changed, with the massive expansion of archaeological study, both above and below ground.

43.   The five unoccupied royal palaces of the Tower of London, Hampton Court Palace, the Banqueting House, Kensington Palace and Kew Palace have been the responsibility of government since the 18th century. Historic Royal Palaces was established in 1989 as an Executive Agency of Government within the Department of the Environment, and the five palaces were brought together and run by this one agency. Later, Historic Royal Palaces was transferred to the Department of National Heritage on its establishment in 1995, later renamed the Department for Culture, Media and Sport. On 1st April 1998, by Royal Charter, Historic Royal Palaces became an independent charity. On 1st April 2014 Historic Royal Palaces took on responsibility for the management of a sixth site, Hillsborough Castle, in Northern Ireland.

The 21st century

44.   Recognition of the importance of the local setting of the Tower led to Historic Royal Palaces to develop a *Tower Environs Masterplan* which envisaged substantial works to the surrounding area. Work completed in 1999-2004 comprised the redevelopment of Tower Hill as a simple, clean-lined piazza by architects Stanton Williams, with matching steel-framed and granite pavilion buildings for welcoming visitors, ticketing and catering, which mediate between the scale of the Tower and commercial buildings to the west. Redundant flood defences were removed from the Wharf and it was repaved in traditional materials. Other improvements in the area, including re-flooding of the moat, remain possible in the future, subject to ensuring that the Tower's OUV is enhanced and appropriate agreements and funding are obtained.

Appendix B - Relevant current planning policy

The relevant elements of current regional and local planning policy (at December 2015) are set out below. References to the NPPF and PPG are to the *National Planning Policy Framework* 2012 and the *Planning Practice Guidance* 2014 respectively.

1.0   Local planning policy framework and procedures

Context

1.1   The locally-managed planning policy framework is hierarchical. The NPPF sets out the national, strategic policies. The associated PPG provides detailed guidance on its application and carries considerable weight in the determination of planning applications. The PPG replaced CLG/DCMS Circular 07/09 on the Protection of World Heritage Sites (2009).

1.2   At the regional level, the national policies of the NPPF are applied and interpreted by the Mayor of London through the *London Plan* and *Supplementary Planning Guidance*. Local planning authorities in London must take both the national and regional policies and guidance into account in preparing their *Local Plan,* against which they determine applications for development. They must also take the NPPF and PPG into account when developing their *Local Plan* policies for protecting and enhancing the WHS.

1.3   Each *Local Plan* comprises a suite of documents including an overarching *Core Strategy*, *Development Plan Documents* (DPDs) and *Supplementary Planning Documents* (SPDs) addressing specific issues or locations. *Local Plans* concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, giving attention to both deliverability and viability. *Local Plans* replace *Local Development Frameworks* and *Unitary Development Plans*. The development of *Local Plans* is still on-going, however, and some policies 'saved' from previous Unitary Development Plans remain in force in some areas, until appropriate DPDs and SPDs have been adopted to replace them.

1.4   Applications for planning permission and listed building consent must be determined in accordance with the prevailing *Local Plan*, 'unless material

considerations indicate otherwise'. Applications must be referred to the Secretary of State (DCLG) where the local authority proposes to grant permission contrary to established policy, or to which Historic England maintains an objection[9]. In both cases, if the local authority is minded to grant consent, the Secretary of State has the opportunity to 'call in' the application and decide the case. By convention, this is always done following a public inquiry.

1.5   The Enterprise and Regulatory Reform Act 2013 was intended to simplify the heritage protection regime. Although not aimed specifically at WHS, two of its provisions may be applicable to the management of large and complex heritage sites such as the Tower of London. *Heritage Partnership Agreements*, setting out a schedule of minor and/or repetitive works for which listed building consent is granted (excluding demolition), may be entered into between local authorities and owners. Local or national *Listed Building Consent Orders* may be set up by a local planning authority, or the Secretary of State, respectively, under which works of the type described in the Order (excluding demolition) will not need listed building consent.

1.6   Local planning authorities have a statutory duty to use their planning powers to preserve (do no harm to) or enhance the character or appearance of conservation areas. The London Borough of Tower Hamlets' adopted *Tower Conservation Area Appraisal* is a material consideration in the determination of applications for development within the conservation area, which covers the whole of the Tower WHS.

Neighbourhood Development Plans

1.7   Local planning authorities also have a duty to assist communities in the development of *Neighbourhood Development Plans* (NDPs). Their duties are set out in the Localism Act 2011. Community organisations, such as a Parish Council or a 'designated neighbourhood forum', may develop an NDP, adding a second, lower tier of locally-based planning priorities, which may promote more (but not less) development than is set out in the *Local Plan*. Neighbourhood Plans are subject to examination by an independent examiner and approval at a local referendum. They must be in general conformity with the relevant *Local Plan* and, in London, with the *London Plan*.

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[9] Town and Country Planning (England) Direction 2009

Article 4 directions

1.8   Some categories of minor development are generally permitted by order, but the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 (GPDO) limited such 'permitted development rights' within WHS. Local authorities also have the power to make Article 4 directions to limit other classes of permitted development within WHS, although no such direction currently applies to the Tower, and it is not believed that any buildings with the Tower complex currently benefit from permitted development rights.

2.0 Regional planning policy

London Plan 2015 (FALP)

2.1   The Greater London Authority (GLA) has responsibility for preparing the spatial development strategy for Greater London, the Mayor's *London Plan 2011*. This provides strategic policy guidance for London until 2036. The most recent version of the plan (currently under review), which was consolidated to include alterations made since 2011, was adopted in March 2015 as the *The London Plan: The Spatial Development Strategy for London: Consolidated with Alterations since 2011*: it can be viewed on the GLA's website at www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan.

2.2   Policy 7.10 (World Heritage Sites) states that development in WHS and their settings, including any buffer zones, should 'conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and OUV'. The policy also states that development should not cause adverse impacts on WHS or their settings (including any buffer zone). In particular, it should not compromise a viewer's ability to appreciate the WHS's OUV, integrity, authenticity or significance. The importance of WHS Management Plans in the planning process is emphasised, particularly the requirement to give appropriate weight to implementing their provisions in considering planning applications. Local planning authorities are advised their *Local Plans* should contain policies to protect, promote, interpret, and conserve the historic significance of WHS and their OUV, integrity and authenticity; and, where appropriate, to enhance both them and their settings. Where available, WHS Management Plans should be used to inform the local plan-making process.

London View Management Framework (LVMF)

2.3   London Plan policies 7.11 (London View Management Framework) and 7.12 (Implementing the London View Management Framework) set out the basis on which the Mayor will designate and protect strategic views in London. Policy 7.11 D specifically identifies the need to protect the views of WHS that contribute to a viewer's ability to recognise and appreciate a WHS's OUV. The view from Queen's Walk (City Hall) to the Tower of London (Townscape View 25), the upstream view from Tower Bridge (River Prospect 10A) and the downstream view from London Bridge (River Prospect 11) are designated as strategically important views (London Plan, Table 7). The Tower is identified as a 'Strategically Important Landmark' in each of these views (London Plan, paragraph 7.39).

2.4   *London Plan Policy 7.12* (Implementing the London View Management Framework) refers specifically to WHS, stating that, 'New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.'

2.5   The LVMF provides visual Management Guidance for each element of the designated Townscape View. There are two aspects to the management of the Townscape View of the Tower of London from City Hall. The first is management of the geometrically defined protected vista (LVMF Appendix D) focused on the White Tower from assessment point 25A.1; the second is management of the wider view from the Queens Walk, between LVMF assessment points 25.A2 and 25.A3. In the wider, view it is accepted that new buildings will be visible and that they should contribute positively to the recognition and appreciation of the Tower and to the overall composition of the view, avoiding a canyon-like effect to either side of the protected vista.

2.6   With regard to the first, geometrically defined Protected Vista the LVMF Management Plan highlights;

> *"the view from just east of City Hall and virtually opposite Traitors' Gate*
> *provides the greatest understanding of the ensemble of buildings, where*
> *spaces between the trees allow a clear view of the southern and western faces*
> *of the White Tower, down to the roof of the Waterloo Block. The clear view of*

the sky in the backdrop of the White Tower from Assessment Point 25A.1 is an important attribute of this view."[10]

A key objective in managing this view of the Tower is to maintain clear sky behind the White Tower (the Protected Silhouette) as seen from the assessment point for the Protected Vista (25A.1) so that the White Tower remains distinct and legible in the view. It is important that developers respect the ability to recognise and appreciate the strategic landmark and contribute to its legibility.

2.7   In the second aspect of the wider, panoramic view, the LVMF accepts that new buildings will be visible: 'In views … (from Assessment Point 25A.2), Tower Bridge complements the World Heritage Site, though today their relationship is undermined by the architecture that exists between them in the background. From this Assessment Point, the view includes the towers of Canary Wharf, seen through the bridge. The view from the eastern part of the Viewing Location, (from Assessment Point 25A.3), is orientated towards the Tower of London and the cluster of tall buildings in the City. The juxtaposition of built elements from a variety of eras is an aspect of the view. The White Tower generally stands free of background development, but other elements of the Tower complex have a backdrop of development.'[11]

2.8   With regard to the foreground and middle ground of the designated view (between the assessment points on Queens Walk and the Tower), the LVMF states:

New development in the foreground should preserve and enhance the relationship between the Tower of London and the river, and its dominance of the townscape view. It is likely that any development in the foreground, in the section of the view in front of the World Heritage Site, would fail to preserve this relationship and should be refused.

2.9   With regard to the background: 'New buildings in the background of the view must be subordinate to the World Heritage Site and respect its historic significance. They should not contradict the townscape ensemble of the Tower of London juxtaposed against predominantly trees in its immediate setting and buildings that tend to be horizontal in mass and scale further behind and to the sides.'

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[10] Management Plan 25 Townscape View: City Hall to Tower of London paragraph 5.
[11] LVMF paragraph 413

2.10   The LVMF emphasises that the viewing point just east of City Hall and virtually opposite the Traitor's Gate provides the greatest understanding of the WHS ensemble of buildings, and that the clear view of the sky in the backdrop of the White Tower from this viewpoint is an important attribute of this view. In association with the LVMF, the Secretary of State DCLG issued a direction requiring planning authorities to consult the Mayor, Historic England, the then Commission for Architecture and the Built Environment (CABE), the neighbouring London boroughs and Historic Royal Palaces about planning applications affecting the protected vista.

2.11   For the River Prospect view from London Bridge (view 11, viewing point 11B), the management strategy in the LVMF emphasises that, while the Tower of London can be seen, it is not as prominent in this view as Tower Bridge. However, the Management Plan does emphasise the importance of the setting of the Tower of London in the context of this view, and that development in the background of the Tower of London must not hamper the ability to see and appreciate the strategically important landmark. This view is subject to qualitative visual assessment as set out in chapter 3 of the SPG (see below).

2.12   In the River Prospect from Tower Bridge (10A), the single viewing point at the North Bastion 'enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised, its visual dominance has been devalued. The middle ground includes the varied elements of the City, rising behind the Tower.' It states that: 'The Tower of London should not be dominated by new development close to it.' (LVMF, pp 99-100)

GLA *Setting of World Heritage Sites SPG*
2.13   The *London Plan* policies are also supported by the GLA's Supplementary Planning Guidance on the settings of London's WHS[12], available on the GLA's website at www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/london-world-heritage. The SPG provides strategic guidance to those (primarily the local planning authorities) with direct responsibility for formulating policies for the management of change and

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[12] GLA London World Heritage Sites: Guidance on Settings 2012

development affecting London's World Heritage Sites through WHS management plans, DPDs and other relevant policies. The assessment framework suggests a series of 'steps' to be followed in assessing the impact of development on the SOUV, setting and other heritage assets

City Fringe Opportunity Area Planning Framework

2.14   The Mayor has prepared a non-statutory *'City Fringe Opportunity Area Planning Framework'* (published 31 December 2015), to assist the three local planning authorities concerned to achieve a co-ordinated approach to the development of this area (which includes St Katherine Dock to the east of the Tower of London WHS). The document does not address the WHS specifically, but identifies numerous sites suitable for tall buildings within the study area that includes an extensive area to the east of the city (see https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/city-fringe)

3.0   Local planning policy

City of London

3.1   The *City of London Local Plan* was adopted by the City Corporation in January 2015 and contains the policies that guide the determination of applications for development within the city. The following policies within the Core Strategy contribute to the protection of the Tower WHS.

> *Core Strategy Policy CS9* (Thames and Riverside) - refers to the area of the City adjacent to the river, the river-front and foreshore, to the west of the Tower.

> *Core Strategic Policy CS12*: Historic Environment - aims 'To conserve or enhance the significance of the City's heritage assets and their settings... By (5) Preserving and, where appropriate, seeking to enhance the OUV, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.'

> *Core Strategic Policy CS13*: aims 'To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks, by: (1) Implementing the Mayor's London View Management

Framework SPG'; and (3) 'Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, which adjoins the City, so ensuring its OUV, taking account of the Tower of London World Heritage Site Management Plan (2007).'

Core Strategic Policy CS14: Tall Buildings - aims 'To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level', by:' (1). Permitting tall buildings on suitable sites within the City's Eastern Cluster; (2). Refusing planning permission for tall buildings within inappropriate areas', including conservation areas; (3). Elsewhere, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features;'

Core Strategic Policy CS7 (Eastern Cluster[13]) - guides proposals for tall buildings in the eastern part of the City (the 'eastern cluster') while seeking to 'accommodate a significant growth in office floor space and employment', including tall buildings. Policy CS7 (3) is aimed at "Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and protected views."

Protected Views Supplementary Planning Document (*SPD*) (2012)

3.2   This SPD provides further details about the application of the LVMF within the City. In addition to summarising the relevant parts of the LVMF, the *SPD* refers to the *Tower of London Local Setting Study* (2010) published by Historic Royal Palaces, and lists eleven representative viewpoints that exemplify the OUV of the Tower of London. The SPD notes that '..development in the City could affect some of these views and any potential impact should be assessed through Townscape and Heritage Impact Assessment.' The *Local Setting Study* document is referred to as an assessment tool relevant to the delivery of Policies CS12 (Historic Environment) and CS13 (Protected Views) (see below)

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[13] Focused around the area bounded by Bishopsgate, Camomile Street, St Mary Axe and Leadenhall Street, as illustrated in Policy CS7, Figure 7.

Adjacent conservation areas

3.3   The Trinity Square and Crescent Conservation areas lie adjacent to the north of the WHS, within the identified local setting (See ToL WHSMP 2007 2.4.10ff). The Crescent CA is partly within the background assessment area of the protected view from the Queen's Walk to the Tower of London view (See LVMF p.211ff). The character appraisals and management strategies for both CAs have been formally adopted by the City Corporation as Supplementary Planning Documents. The *Crescent CAA* (2012) states that: 'development proposals in this area must be designed or sited so that they preserve or enhance the viewer's ability to recognise or appreciate the strategically important landmark, in this case, the Tower of London[14].'

Thames Strategy Supplementary Planning Document (SPD)(2015)

3.4 The City Corporation's Thames Strategy SPD guides the development of the Thames Riverside within the City in line with policy CS9 of the Local Plan 2015. The City's riverside location has shaped it throughout its history and continues to present opportunities and challenges for the spatial planning of the area. The strategy looks forward to 2026, identifying the issues that the riverside might face. The aim is that the City should capitalise on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising the risks to the City's communities from flooding. Key objectives include public realm enhancement and the protection and enhancement of heritage assets within the policy area.

London Borough of Southwark

3.5   The London Borough of Southwark adopted the Core Strategy of its (then) LDF in 2011. Planning applications are currently determined on the basis of the 2011 Core Strategy (2011) and saved policies from the Southwark Local Plan 2007. The Core Strategy will be combined with new development management policies to form the *New Southwark Plan.* This will set out the Council's regeneration strategy from 2017 - 2033 and will be used to make decisions on planning applications. The 'Preferred Option' draft of the Plan is currently (November 2015) subject to public consultation.

3.6   The Core Strategy includes a 'Strategic Objective' (2F) that aims to 'Conserve and protect historic and natural places'. The key policies supporting this

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[14] The adopted text cites 'St Paul's Cathedral', but the mistake is acknowledged in an *errata* statement which can be viewed on the City's website alongside the Crescent CAA SPD.

objective are:

> *Policy SP12* - which states *inter alia* that the Council will achieve this by 'Expecting development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment..' and 'Making sure that the height and design of development conserves and enhances strategic views and is appropriate to its context, the historic environment and important local views.' The supporting text notes the proximity of the Tower WHS on the north side of the Thames. It also identifies a number of locations within the Borough that are considered suitable for tall buildings, including London Bridge, where what is currently Europe's tallest building, the 95 storey 'Shard of Glass', was completed in 2012. This building is now a dominant feature of the central London skyline.

> Policies 'saved' from *The Southwark Plan* (2007) - include those relating to the conservation of the historic environment (Policies 3.15 - 3.20). Policy 3.21 (Strategic Views) has been replaced by the *London Plan* and LVMF. The key policy with regard to the Tower WHS is Policy 3.18, 'Setting of Listed Buildings, Conservation Areas and World Heritage Sites', which states that 'permission will not be granted for developments that would not preserve or enhance...

> • the setting of a World Heritage Site
> • important views of or from a World Heritage Site.'

> *Policy 3.20* - the Borough's current policy with regard to high buildings, makes no reference to the WHS, or the need to respect the historic environment, though it stresses that tall buildings should relate well to their surroundings and contribute positively to the London skyline as a whole.

3.7 The *Draft Development Management Policy DM12* Tall Buildings - states that tall buildings should have no harmful impact on strategic view as set out in the London Views Management Framework...' (DM12e) and 'avoid unacceptable harm to the significance of designated heritage assets or their settings' (DM12f). Draft Development Management Policy DM19 states that: 'Planning permission will only be granted for development that sustains and enhances the significance of the Outstanding Universal Value of World Heritage Sites and their settings, including within views in, out and across the sites.'

3.8 The *Blackfriars Road Supplementary Planning Document* (SPD) was adopted by the Council in 2014 to guide redevelopment in that area. The SPD recognises

that development such as very tall buildings could have an impact on the wider setting of the Tower WHS. The SPD does not contain new or specific guidance on this issue. It refers to pre-existing policy and guidance such as the London Plan to guide the assessment of such development proposals.

3.9   LB Southwark has produced a further draft planning document, the *Bankside Borough and London Bridge Supplementary Planning Document and Opportunity Area Planning Framework* (February 2010. This set out local development planning policy for the area adjacent to the south bank of the Thames opposite the Tower WHS, and including the whole of the 'local setting' of the WHS (see paragraphs 2.4.10-12, above) that lies to the south of the river. Early in 2011, work on the SPD was put on hold pending the New Southwark Plan. The Council has been working since then with local groups in the north of the borough to prepare neighbourhood plans. Neighbourhood plan areas have been designated in Bankside, Waterloo and South Bank and Bermondsey. The Neighbourhood Plans for these areas are still in preparation.

London Borough of Tower Hamlets

3.10   Tower Hamlets *Local Plan* consists of the *Core Strategy* and *Managing Development Document* (MDD). The *Core Strategy* was adopted in 2010. This states (Spatial Policy 10) that the Council will 'Protect, manage and enhance the Tower of London World Heritage Site, its setting, and surrounding area... through ... the World Heritage Site Management Plans and associated documents' and 'Protect and enhance the following heritage assets and their settings: [including] World Heritage Sites'. The policy identifies Aldgate as one of two locations suitable for tall buildings.

3.11   The *Managing Development Document* (MDD) was adopted in April 2013. It includes Policy DM28: World Heritage Sites. This states that:

   1. Development will need to ensure it does not negatively affect the UNESCO World Heritage Site status of the Tower of London or Maritime Greenwich. Development must be tested for its impact on the sites' Outstanding Universal Value (OUV), ensuring and illustrating that the proposal sustains and enhances the OUV of the World Heritage Sites. This also applies to development that would affect the setting of the Tower or Maritime Greenwich, particularly in the environs of Tower Hill and the Isle of Dogs, or would impinge upon strategic or other significant views to or from the sites.

2. Development proposals within the vicinity of the Tower of London will be expected to demonstrate how they will improve local access routes, including signage and way-finding, to the Tower from the development site.

3.12   The *Aldgate Masterplan* was adopted by the Council in 2007 as Interim Planning Guidance and, as such, it remains a material consideration in the determination of planning applications. The Masterplan restates the principle that Aldgate is a suitable location for tall buildings, in line with the Mayor's draft *City Fringe Opportunity Area Planning Framework* (2008). The *Masterplan* states that such buildings should 'preserve or enhance the background setting of the Tower of London World Heritage Site, in accordance with the Mayor's *View Management Framework* and the *World Heritage site Management Plan*'. The document notes that the tallest building should be located in a cluster between Whitechapel High Street and Braham Street and that heights should step down from this cluster.

3.13   The *Tower of London Conservation Area Appraisal and Management Guidelines* was adopted by LB Tower Hamlets in 2008 and its provisions are material considerations in the determination of planning applications. The document refers to the WHS Management Plan for management proposals for the CA (p.5 and elsewhere). It states (page 20) that: 'Any new development in this area should respect the importance of the Tower, and should follow the guidelines in the World Heritage Site Management Plan.'

3.14   In addition to the strategic views identified in the LVMF, the appraisal refers to local views as follows: '... there are many important local views, particularly around the Tower walls. The views of the Tower from the north, from the exit to Tower Hill underground station and from the pedestrian underpass are particularly significant as they are often the first glimpse of the Tower for visitors. Views towards the White Tower along several streets in the area are also significant, for example the view south along Mansell Street' (p.13)

4.0   Conservation Area Appraisals

4.1   Conservation Area Appraisals adopted by local authorities as *Supplementary Planning Documents* form part of the relevant *Local Plan* and as such are a key factor in the determination of planning applications affecting the heritage significance of the CA. Appraisals adopted under the previous (UDP)

regime may carry slightly less weight but are still material considerations in the determination of applications.

Planning Authority	Conservation Area	Conservation Area Appraisal status
City of London	Trinity Square	Adopted 2014 (SPD)
City of London	Crescent	Adopted 2012 (SPD)
London Borough of Tower Hamlets	Tower of London	Adopted 2008.
London Borough of Southwark	Bermondsey Street	Adopted 2003
London Borough of Southwark	Borough High Street	Adopted 2006
London Borough of Southwark	St. Saviour's Dock	Adopted 2003
London Borough of Southwark	Tooley Street	Adopted 2003
London Borough of Southwark	Tower Bridge	Adopted 2003
London Borough of Southwark	Union Street	Adopted (n/d)

5.0   Guidance produced by statutory bodies

5.1   Historic England is the government's statutory adviser on the historic environment, having replaced English Heritage in 2015. Design Council: CABE (formerly CABE[15]) promotes high standards in architecture and the design of the built environment. Both organisations produce guidance. Guidance previously published by English Heritage has generally been adopted by Historic England, unless it has been superceded by more recent publications. English Heritage/Historic England guidance is normally a material consideration in determining planning applications, but it is non-statutory and it does not carry the weight of government policy and guidance. All Historic England guidance is available on the organisation's website at www.historicengland.org.uk/advice

Guidance on Tall Buildings

5.2   The joint English Heritage/ CABE *Guidance on Tall Buildings* (2007) has

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[15] Commission for Architecture and the Built Environment

been revised to take account of the provisions of the NPPF (2012) and the PPG (2014) and was republished by Historic England as Advice Note 4: *Tall Buildings* (December 2015). The guidance notes that 'tall buildings can significantly affect the image, character and identity of towns and cities as a whole' and that, '...if not in the right place and well designed, a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place.'

5.3 The guidance emphasises the need for an up-to-date local plan, based on a sound evidence base, to contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (NPPF paragraphs 169-170). This will help local planning authorities to identify in their local plans where tall buildings would not be appropriate because of their adverse impact and to take a positive, managed approach to proposals for such buildings, rather than simply reacting to speculative development applications. Extensive advice is provided on the location and design of tall buildings, the information to be provided with an application relating to a tall building, and the recommended approach to assessing its impact.

5.4 The guidance also notes that, where relevant, the local planning authority will need to consider the impact on WHS. The 'Statement of Outstanding Universal Value' (SOUV) and the management plan prepared for each WHS are material considerations in the planning process.

Seeing the History in the View

5.5   English Heritage published detailed (non-statutory) guidance and a methodology for assessing the impact of development on views in the historic environment, *Seeing the history in the View* (May 2011). Historic England is currently revising this document to reflect the NPPF, other Government initiatives and recent case law.

Appendix C - Prior public consultation processes

Website

The consultation draft was placed on the Historic Royal Palaces' website from 12th January 2016 – 8th February 2016.

Consultation

Copies of the consultation draft were sent out to all members of the Management Plan Consultative Committee.

Advertisement

An advertisement to promote the consultation, in particular the outdoor exhibition, the on-deposit draft Plans and the website, was placed in the 11th January 2016 edition of the 'East End Life'.

Appendix D - About Historic Royal Palaces

Historic Royal Palaces was established in 1988 as a Royal Charter Body with charitable status and is contracted by the Secretary of State for Culture, Media and Sport to manage the palaces on her behalf. It is responsible for the care, conservation and presentation to the public of the unoccupied royal palaces: HM Tower of London, Hampton Court Palaces, Kensington Palace State Apartments, the Banqueting House at Whitehall and Kew Palaces with Queen Charlotte's Cottage.

Historic Royal Palaces is governed by a Board of Trustees, all of whom are non-executive.

The Chief Executive is accountable to the Board of Trustees. The palaces are owned by the Queen on behalf of the nation. Historic Royal Palaces is a Public Corporation and receives no public revenue funding – all costs are met by self-generated income.

The objectives of Historic Royal Palaces, as set out in its Royal Charter, are, for the benefit of the nation:

- to administer, conserve, renovate, repair, maintain and improve the palaces to a high standard consistent with their status as buildings of royal, historic and architectural importance;

- to educate and inform understanding of the public about the palaces and the skills required for their conservation by providing public access, by exhibition, by the preparation of records, catalogues and inventories, by research and by publication and by such other means as are appropriate.

Our Cause

To help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

Our work is guided by four principles:

Guardianship

We exist for tomorrow, not just yesterday. Our job is to give these palaces a future as long and valuable as their past. We know how precious they and their contents are, and we aim to conserve them to the standard they deserve: the best.

Discovery

We explain the bigger picture, and then encourage people to make their own discoveries: in particular, to find links with their own lives and the world today.

Showmanship

We do everything with panache. Palaces have always been places of spectacle, beauty, majesty and pageantry, and we are proud to continue that tradition.

Independence

We have a unique task, and our own point of view. We challenge ourselves to find new and different ways to do our work. We are an independent charity, not funded by the government or the Crown, and we are keen to welcome everyone who can support us in our cause.

Appendix E – Text of the Justification for Inscription contained in the State Party's Nomination Dossier and copy of ICOMOS evaluation

Justification as provided by State Party

The Tower of London was first built by William the Conqueror for the purpose of protecting and controlling the city. Of the present buildings the White Tower survives largely intact from the Norman period, and architecture of almost all the styles which have flourished in England since may be found within the walls.

The Tower has in the past been a fortress, a palaces and a prison, and has housed the Royal Mint, the Public Records and (for a short time) the Royal Observatory. It was for centuries the arsenal for small arms, the predecessor of the existing Royal Armouries, and, as one of the strongest fortresses in the land, has from early times guarded the Crown Jewels.

The Tower today is the key to British history for many thousands of visitors who come every year from all over the world to see the buildings, the Royal Armouries and the Crown Jewels and the museum collections, to relive the past and enjoy the pageantry of the present. But at the same time it is still a fortress, a royal palace, and the home of a community of some 150 hardworking people. As such it epitomises all that is best in World Heritage. UNESCO criteria: 5a) II, IV, VI.

ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

WORLD HERITAGE LIST   N° 488

A) IDENTIFICATION

Nomination : The Tower of London

Location : London

State Party : United Kingdom

Date : December 28, 1987

B) ICOMOS RECOMMENDATION

That the proposed cultural property be included on the World Heritage List on the basis of criteria II and IV.

C) JUSTIFICATION

On Christmas Day 1066 following his victory at Hastings, William the Conqueror was crowned king at Westminster Abbey. He immediately set about fortifying London, his new chief city. To command the city on its seaward and most vulnerable side he quickly had an earth-and-timber keep built on top of an artificial mound in the southeast angle of the ancient Roman walls. A ditch and a palisade protected the yard on the northwest side.

Ten years later, in full control of England, William replaced these traditional defenses with a grand edifice in stone, a sort of palace-fortress which was immediately named the Tower of London. Built during the 1080s and modified over the centuries (the cupolas of the corner towers are from the reign of Henry VIII, the windows were nearly all enlarged in 1715), the White Tower, as it is now called, became the centrepiece of the complex of fortifications, courtyards, and buildings which extends over 7.3 hectares. The whole ensemble came to be known as the Tower of London, the name which originally applied only to the keep of 1076.

At the heart of this defensive stronghold, which affords a comprehensive review of medieval and post-medieval construction techniques, the White Tower (so named because of its whitewashed walls) both exemplifies Norman architecture of the time and is unique for the ambitiousness of its design. It is undeniably the most significant element of the ensemble for World Heritage, even if other parts of the Tower of London are associated with tragic moments in the history of the English monarchy, for example the "Bloody Tower", where the sons of Edward IV were assassinated in 1483.

The White Tower, an impressive parallelepipedal block measuring 35.9m x 32.6m on the ground, rises to more than 27 meters above the mound. No expense was spared in constructing this monument which symbolized the power of the new ruler. The massive walls (4.6m thick at the base) were made of Kentish limestone, with ashlars of Caen stone, imported at great expense from the conquerors' Norman domain, laid at the corners and around the doors, windows and arrow-slits.

Inside, the three principal levels of the keep incorporates the requirements of both a defensive work and a royal residence. It includes a chapel situated over two storeys of lower chambers which jut out from the southeastern wall. At the corners of the building are four turrets: three are rectangular, while the fourth, located at the northeast angle, is circular and has a spiral staircase. This massive Norman castle dominates the whole of the fortified works of the Tower of London, which include the remains of the inner curtain wall from the time of Richard the Lionhearted and John Lackland, the outer curtain built by Edward I and the numerous later constructions.

Recalling that the Castle of Durham (whose chapel built in 1072 was part of the original Norman keep) along with the nearby Cathedral were included on the World Heritage List in 1986, ICOMOS fully recommends that the Tower of London be included on the basis of 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. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.

- **Criterion IV.** The White Tower is the example par excellence of the royal Norman castle in the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture.

ICOMOS Observations

ICOMOS draws the Committee's attention to the inconsistent value of the surroundings of the Tower of London. Alongside certain remarkable and historically valuable elements, such as Tower Bridge, outsized buildings have increasingly been built in the Docks area. The most regrettable one is the Tower Hotel, which seriously modifies the urban landscape in the St. Katherine's dock area and diminishes the monumental value of the Tower of London. ICOMOS expresses the wish that the Committee recommend that the United Kingdom authorities make strenuous efforts to protect the surroundings of the Tower of London in order to prevent any further abuse of this nature.

ICOMOS, July 1988

Appendix F – Criteria for the assessment of 'outstanding universal value'

Until the end of 2004, World Heritage sites were selected on the basis of six cultural and four natural criteria. With the adoption of the revised Operational Guidelines for the Implementation of the World Heritage Convention in 2005, only one set of ten criteria exists.

Nominated properties will meet one or more of the following criteria:

i. represent a masterpiece of human creative genius;

ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

iii. bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared;

iv. be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

v. be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

vi. be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);

vii. contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance;

viii. be outstanding examples representing major stages of earth's history,

including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;

ix. be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals;

x. contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

Appendix G – Scheduled Monuments and Listed Structures within the World Heritage Site

General

This appendix lists the main heritage assets at the Tower. An indication of the date of the main building phases of the asset is given with details of its statutory protection.

Scheduled Monuments

The total area of the Tower to the outer edge of the moat, including all buildings and structures, is a Scheduled Monument (Greater London SAM No. 10). These boundaries around it also represent the current limit of the WHS as inscribed by UNESCO. The Tower SM is bounded the Tower Hill West SM (Greater London SAM No. 158) to the west. The boundaries of this monument runs from the West Gate across the head of the (infilled) Tower Dock before turning north to follow the administrative and political boundary between the Corporation of London and the London Borough of Tower Hamlets as far as the north edge of Tower Hill Terrace. The Scheduled area then returns eastward to rejoin the Tower SM at the north-west corner of the moat garden railings. Both monuments lie within the London Borough of Tower Hamlets. The Roman city wall on Tower Hill (north) is also scheduled (Greater London SAM No. 14).

Listed Buildings and Structures

Within the curtilage of the Tower and SM, the vast majority of the buildings and structures are Listed and graded appropriate to their antiquity and significance. Five are Grade I, two Grade II* and the remainder Grade II. There are also numerous other Listed buildings and structures within the environs outside of the WHS boundaries, including All Hallows Barking church, Tower Vaults, Trinity House, 10 Trinity Square, the Lutyens war memorial in Trinity Gardens, and the Royal Mint buildings.

A plan and list of Scheduled Monuments and Listed Structures within the World Heritage Site is provided below.

Key:
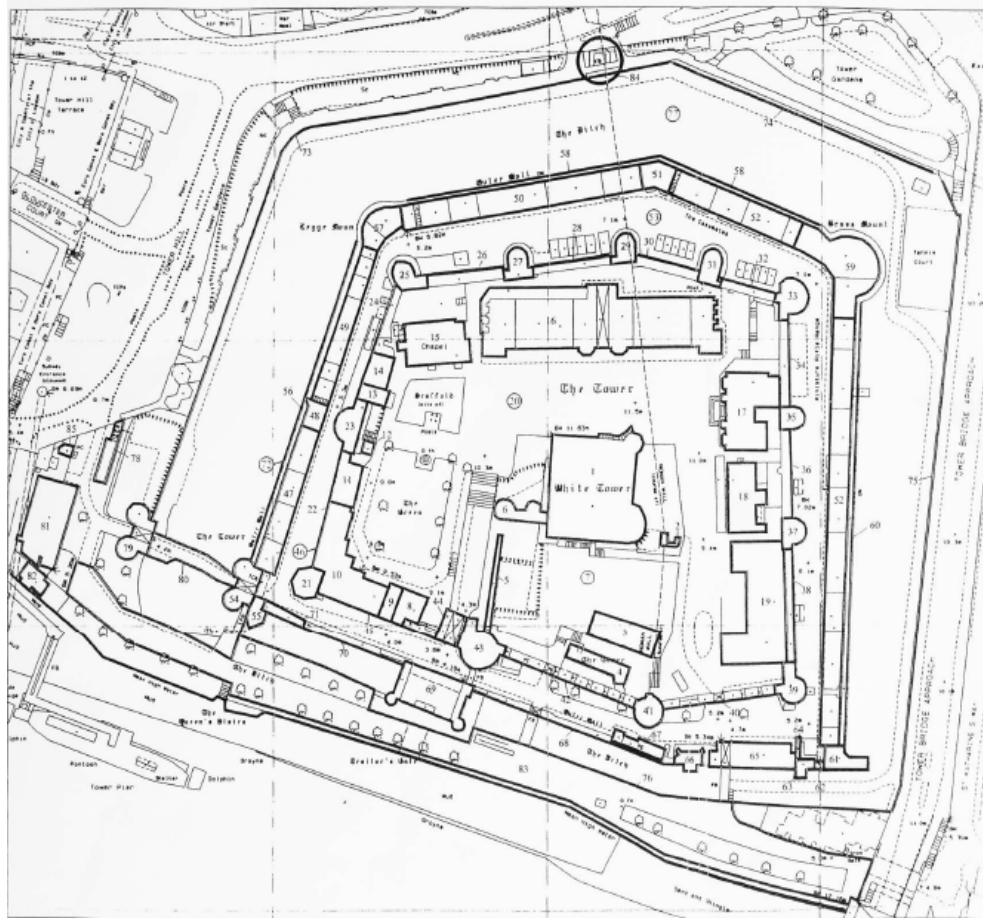
Innost Ward
1 White Tower
2 Wardrobe Tower
3 Roman Wall Shop
4 Roman Wall
5 Main Guard Wall
6 Coldharbour Gate
7 Innost Ward Area

Inner Ward
8 8 Tower Green
9 7 Tower Green
10 Queen's House
11 4 & 5 Tower Green
12 Beauchamp Toilet Block
13 2 Tower Green
14 1 Tower Green
15 Chapel of St Peter
16 Waterloo Block
17 Regimental Museum
18 Hospital Block
19 New Armoury
20 Inner Ward Area

Inner Curtain Wall
21 Bell Tower
22 Curtain Wall
23 Beauchamp Tower
24 Curtain Wall
25 Devereux Tower
26 Curtain Wall
27 Flint Tower
28 Curtain Wall
29 Bowyer Tower
30 Curtain Wall
31 Brick Tower
32 Curtain Wall
33 Martin Tower
34 Curtain Wall
35 Constable Tower
36 Curtain Wall
37 Broad Arrow Tower
38 Curtain Wall
39 Salt Tower
40 Curtain Wall
41 Lanthorn Tower
42 Curtain Wall
43 Wakefield Tower
44 Bloody Tower
45 Curtain Wall
46 Inner Curtain Wall Area

Outer Ward
47 1-3 Casemates
48 4 Casemates
49 4a - 5 Casemates
50 7-10 Casemates
51 The North Bastion
52 Salvin's Casemates
53 Outer Ward Area

Outer Curtain Wall
54 Byward Tower
55 Postern & Walls
56 Curtain Wall
57 Legge's Mount
58 Curtain & Bastion
59 Brass Mount
60 Curtain Wall
61 Devlin Tower
62 Curtain Wall
63 Well Tower
64 Curtain Wall
65 Yeoman Warder's Club
66 Cradle Tower
67 Cradle Tower Toilets
68 Curtain Wall
69 St Thomas's Tower
70 Curtain Wall
71 Water Lane Shop
72 Outer Curtain Wall Area

Moat
73 NW & W Revetment
74 NE Moat Revetment
75 E Moat Revetment
76 S Moat Revetment
77 Moat Area Appraisal

Approaches
78 Lion Gate Causeway
79 Middle Tower
80 West causeway
81 Pump House
82 Wharfinger's Cottage
83 Wharf
84 City Postern
85 Pass Office

Asset No.	Asset name	Date of main building phases	Statutory Designation
INMOST WARD			
1	White Tower	11th century	Grade I Listed Building
2	Wardrobe Tower	12th century	(Scheduled Monument)
3	Roman Wall Shop	20th century	(Scheduled Monument)
4	Roman Wall	4th century	(Scheduled Monument)
5	Main Guard Wall	1220s–30s	(Scheduled Monument)
6	Coldharbour Gate	13th century	(Scheduled Monument)
7	*Inmost Ward Area Appraisal -*		*(Scheduled Monument*
INNER WARD			
8	8 Tower Green	1866-9	Part of Grade I Inner Curtain Wall Listed Building
9	7 Tower Green	17th/18th century	Part of Grade I Inner Curtain Wall Listed Building
10	Queen's House	*c*1540 and later	Part of Grade I Inner Curtain Wall Listed Building
11	4&5 Tower Green	17th century	Part of Grade I Inner Curtain Wall Listed Building
12	Beauchamp Toilet Block	20th century	(Scheduled Monument)
13	2 Tower Green	*c*1700-20	Part of Grade I Inner Curtain Wall Listed Building
14	1 Tower Green	1749	Part of Grade I Inner Curtain Wall Listed Building
15	Chapel of St Peter	*c*1519-20 rebuild	Grade I Listed Building
16	Waterloo Block	1845	Grade II Listed Building
17	Regimental Museum	1845	Grade II Listed Building
18	Hospital Block	1718-19	Grade II* Listed Building
19	New Armoury	1663-64	Part of Grade I Inner Curtain Wall Listed Building
20	*Inner Ward Area Appraisal -*		*(Scheduled Monument)*

INNER CURTAIN WALL

21	Bell Tower	*c*1190-1200	Part of Grade I Inner Curtain Wall Listed Building
22	Curtain Wall between Bell and Beauchamp Towers	*c*1281	Part of Grade I Inner Curtain Wall Listed Building
23	Beauchamp Tower	*c*1281, 19th century	Part of Grade I Inner Curtain Wall Listed Building
24	Curtain Wall between Beauchamp and Devereux Towers	*c*1281	Part of Grade I Inner Curtain Wall Listed Building
25	Devereux Tower	1238-75, 17th/18th centuries	Part of Grade I Inner Curtain Wall Listed Building
26	Curtain Wall between Devereux and Flint Towers	1238-75, 19th century	Part of Grade I Inner Curtain Wall Listed Building
27	Flint Tower	19th-century rebuild	Part of Grade I Inner Curtain Wall Listed Building
28	Curtain Wall between Flint and Bowyer Towers	1238-75, 19th century	Part of Grade I Inner Curtain Wall Listed Building
29	Bowyer Tower	1238-75, and *C*19th century	Part of Grade I Inner Curtain Wall Listed Building
30	Curtain Wall between Bowyer and Brick Towers	1238-75, 19th century	Part of Grade I Inner Curtain Wall Listed Building
31	Brick Tower	19th-century rebuild	Part of Grade I Inner Curtain Wall Listed Building
32	Curtain Wall between Brick and Martin Towers	19th-century rebuild / reface	Part of Grade I Inner Curtain Wall Listed Building
33	Martin Tower	1238-75, 17-18th	Part of Grade I Inner Curtain Wall

		centuries	Listed Building
34	Curtain Wall between Martin and Constable Towers	19th-century rebuild / reface	Part of Grade I Inner Curtain Wall Listed Building
35	Constable Tower	1238-75, 19th century	Part of Grade I Inner Curtain Wall Listed Building
36	Curtain Wall between Constable and Broad Arrow Towers	1275-85 and C19th century rebuild/ reface	Part of Grade I Inner Curtain Wall Listed Building
37	Broad Arrow Tower	1238-75, and C19th century	Part of Grade I Inner Curtain Wall Listed Building
38	Curtain Wall between Broad Arrow and Salt Towers	1275-85, 19th century	Part of Grade I Inner Curtain Wall Listed Building
39	Salt Tower	c1238-75, and C19th century	Part of Grade I Inner Curtain Wall Listed Building
40	Curtain Wall between Salt and Lanthorn Towers	19th century	Part of Grade I Inner Curtain Wall Listed Building
41	Lanthorn Tower	19th century	Part of Grade I Inner Curtain Wall Listed Building
42	Curtain wall between Lanthorn and Wakefield Towers	19th century	Part of Grade I Inner Curtain Wall Listed Building
43	Wakefield Tower	1220-40, and C19th and 20th century	Part of Grade I Inner Curtain Wall Listed Building
44	Bloody Tower	1220s, 1360-2, 1603, C19th century	Part of Grade I Inner Curtain Wall Listed Building
45	Curtain Wall between Bloody	C1170	Part of Grade I Inner Curtain Wall Listed Building

and Bell Towers

| 46 | *Inner Curtain Wall Area Appraisal* | | *(Scheduled Monument)* |

OUTER WARD

47	1-3 casemates	18th century	Part of Grade I Outer Curtain Wall Listed Building
48	4 casemates	18th century	Part of Grade I Outer Curtain Wall Listed Building
49	4a – 5 casemates	18th century	Part of Grade I Outer Curtain Wall Listed Building
50	7-10 casemates	1853	Part of Grade I Outer Curtain Wall Listed Building
51	North Bastion	1848	Part of Grade I Outer Curtain Wall Listed Building
52	Salvin's casemates	*c*1856	Part of Grade I Outer Curtain Wall Listed Building
53	*Outer Ward Area Appraisal*		*(Scheduled Monument)*

OUTER CURTAIN WALL

54	Byward Tower	1275-85, and *c* 18th and 19th century	Part of Grade I Outer Curtain Wall Listed Building
55	Postern & Walls	*c*1350, 16th century	Part of Grade I Outer Curtain Wall Listed Building
56	Curtain Wall between Byward Tower and Legge's Mount	1275-85, 16th / 19th centuries	Part of Grade I Outer Curtain Wall Listed Building
57	Legge's Mount	1275-85, 1682-3 and *C*19th century	Part of Grade I Outer Curtain Wall Listed Building
58	Curtain Wall between Legge's Mount and Brass	1275-85, 19th century	Part of Grade I Outer Curtain Wall Listed Building

	Mount and North Bastion		
59	Brass Mount	*C*1300, 17th and 20th centuries	Part of Grade I Outer Curtain Wall Listed Building
60	Curtain Wall between Brass Mount and Devlin Tower	1275-85, 19th century	Part of Grade I Outer Curtain Wall Listed Building
61	Devlin Tower	1275-85, 1679, 19th century	Part of Grade I Outer Listed Building
62	Curtain Wall between Devlin and Well Towers	*c*1348-55, 19th century	Part of Grade I Outer Curtain Wall Listed Building
63	Well Tower	1275-85, 19th century	Part of Grade I Outer Curtain Wall Listed Building
64	Curtain Wall between Well and Cradle Towers	*c*1348-55, 1774, 19th century	Part of Grade I Outer Curtain Wall Listed Building
65	Yeoman Warders Club	19th century	Part of Grade I Outer Curtain Wall Listed Building
66	Cradle Tower	1348-55, 19th century	Part of Grade I Outer Curtain Wall Listed Building
67	Cradle Tower toilets	19th century	Part of Grade I Outer Curtain Wall Listed Building
68	Curtain Wall between Cradle Tower and St Thomas's Tower	*c*1348-55, 19th century	Part of Grade I Outer Curtain Wall Listed Building
69	St Thomas's Tower	1275-79, 1532, 19th century	Part of Grade I Outer Curtain Wall Listed Building
70	Curtain Wall between St Thomas's Tower and the Byward Postern	*c*1348-55,	Part of Grade I Outer Curtain Wall Listed Building
71	Water Lane Shop	?16th century	Part of Grade I Outer Curtain Wall Listed Building

72	*Outer Curtain wall Area - Appraisal*	*(Scheduled Monument)*

MOAT

73	North-west and West Moat Revetment Wall	1670-3	Grade II Listed Building
74	North-east Moat Revetment Wall	1670-3, and *C*19th and 20th century	Grade II Listed Building
75	East Moat Revetment Wall	19th century	Part of Grade I Tower Bridge Listed Building
76	South Moat Revetment Wall	1365-70, *c*18th and 19th centuries	Grade II* Listed Building
77	*Moat Area Appraisal -*		*(Scheduled Monument)*

APPROACHES

78	Lion Gate Causeway and bridge		(Scheduled Monument)
79	Middle Tower	Medieval +	Grade I Listed Building
80	West causeway		(Scheduled Monument)
81	Pump House	19th century	Grade II Listed Building
82	Wharfinger's Cottage	19th century	(Scheduled Monument)
83	Wharf	14th +	(Scheduled Monument)
84	City Postern	Medieval+	(Scheduled Monument)
85	Pass Office	20th century	(Scheduled Monument)
86	K6 Telephone Kiosk	20th century	Grade II Listed Building
87	8 Bollards (on pavement outside main entrance to Tower of London)	20th century	Grade II Listed Building
88	HM Tower of London liberty boundary markers	19th century	Grade II Listed Building