## PALACE OF WESTMINSTER AND WESTMINSTER ABBEY INCLUDING SAINT MARGARET'S CHURCH United Kingdom (426bis)

In accordance with Decision **45 COM 7B.205** the United Kingdom State Party has produced this State of Conservation Report (SOCR) for the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Site (Westminster World Heritage Site).

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

#### 1. Executive Summary of the Report

The State Party is pleased to note that the Committee has welcomed progress made in a number of areas. Since the State Party submitted its last state of conservation report, in November 2022, work to maintain and further strengthen protections for the property has continued.

The relevant local planning authorities, Historic England and other parties work in partnership to improve understanding and management of the property. Historic England, as the national adviser and statutory consultee, continues to support implementation of the principles of heritage impact assessment. The recommendations of the 2017 ICOMOS/ICCROM Reactive Monitoring Mission report remains a point of reference to inform approaches to policy development. The passing of the Levelling Up and Regeneration Bill into law is confirmed, with further reports to follow on bringing the provisions related to World Heritage into force.

Review and update of the WHS Management Plan is underway, with ongoing public consultation including around how the attributes of the property can best be defined. This will enhance the use of heritage impact assessment as a tool to inform the development of proposed interventions in and around the property.

Key Performance Indicators have been implemented under the London Plan which are relevant to World Heritage Sites. Whilst it is as yet too early to measure progress, the data collected will in time enhance understanding and protection of the property's attributes, and inform review of the important protections in place under the adopted London Plan.

Further information regarding developments across the River Thames from the property on and around the St Thomas Hospital site has been submitted separately. The Committee's concerns are noted; positive progress has nonetheless been made by the local planning authority in setting out its approach to future site allocations informed by heritage impact assessment.

The use of digital models to assess changes to the historic environment and as a tool to negotiate sustainable solutions and support planning advice continues. Digital models are also being used to inform changes to the London View Management Framework with reference to the safeguarding of the property's protected silhouettes and visual impacts on its integrity.

The governance arrangements for the Restoration and Renewal project have been revised, alongside ongoing consideration of delivery options. The State Party aims to report further on the project's approach to heritage impact assessment in 2025. Work to the Palace of

Westminster supports conservation of its attributes, and the proposed Parliament Square Streetscape Project is intended to support enhancements of the experience within its setting.

While acknowledging the concerns of the World Heritage Committee in relation to the proposed Holocaust Memorial and Learning Centre, the State Party remains committed to this project and its proposed location.

In the remaining sections of the report the State Party provides a summary of two projects both of which support the OUV of the property in different ways. The temporary Education Centre at the Houses of Parliament contributes to the presentation and transmission of the property's OUV. Ongoing conservation work at Westminster Abbey and St Margaret's Church supports maintenance and conservation of the historic fabric of these two attributes.

The State Party has reported that a number of reviewed and updated documents supporting the management of the property will come forward over the course of 2025 which support ongoing objectives. It will continue to update the World Heritage Committee on this progress in advance of the Committee's examination of the property's state of conservation in 2025.

#### 2. <u>Response from the State Party to the World Heritage Committee's Decision 45</u> <u>COM 7B.205</u>

The World Heritage Committee,

- 1. Having examined Document WHC/23/45.COM/7B,
- 2. <u>Recalling</u> Decisions <u>44-COM 7B.161</u> and <u>43 COM 7B.94</u> adopted at its extended 44<sup>th</sup> session (Fuzhou/online, 2021) and 43rd session (Baku, 2019) respectively,
- 3. <u>Welcomes</u> the State Party's continued efforts to implement and use the 2017 joint ICOMOS/ICCROM Reactive Monitoring mission recommendations to inform emerging planning policy, and the continued efforts and advice of Historic England to influence statutory decision making, <u>acknowledges</u> the information provided on the 'Levelling Up and Regeneration' Bill and <u>encourages</u> the State Party to keep the World Heritage Centre informed about its progress and implications;

The State Party is pleased that the Committee welcomes the progress that has been made to date. Since the last Report was submitted, all relevant authorities have continued work to maintain and further strengthen protection of the property. All parties continue to refer to and use the findings of the 2017 Joint Reactive monitoring mission report to inform the approach to policy and development affecting the property. Updates are provided throughout this State of Conservation Report on the further progress of emerging planning policy since the last State of Conservation Report was submitted in November 2022. The State Party will continue to liaise with the World Heritage Centre to ensure, via Historic England, that ICOMOS' recommendations are able to contribute to the review of emerging policy.

#### Historic England's Advice

As the State Party's adviser on World Heritage, Historic England's advice to local planning authorities regarding proposed developments within the vicinity of the property makes an important contribution to the consideration of their impact. Historic England's advice also continues to input to the development of new, and review of existing, policy in relation to the property, and to promote consistency of approach between the local authorities who jointly share responsibility for the management of change within its setting. Historic England will also continue to support implementation of the principles of heritage impact assessment through published and statutory advice in relation to planning policy and the determination of individual applications, and training.

Historic England is conscious in particular of the need for further guidance for developers and local government on the implementation of the approach set out in UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022) within the English planning system. The State Party is aware that Historic England is therefore both in the process of producing new guidance on the management of change to World Heritage Sites in England, and working to promote better understanding of UNESCO's guidance. In this wider context Historic England has been working jointly with ICCROM to engage with World Heritage stakeholders involved in the planning process. This engagement has focused on understanding in which areas most support is needed for future guidance and training. Principally, this has highlighted the need to enhance familiarity with the use of an iterative approach to heritage impact assessment as a tool to inform development of a proposal. The State Party welcomes the Advisory Body's contribution to this important area of work.

#### Levelling Up and Regeneration Act (2023)

The Levelling Up and Regeneration Bill became law in October 2023 bringing improved heritage protection. This was announced in a <u>Government press release</u>, and Historic England also published a <u>briefing</u> on this new legislation from a heritage perspective.

The principal heritage-related provision with direct relevance to World Heritage is that of the regard to certain heritage assets in the exercise of planning functions (Section 102). This comprises a statutory duty to give special regard when exercising planning functions to the desirability of preserving or enhancing a World Heritage Site or its setting. This duty has been introduced for the first time in England and would apply to decisions about whether to grant applications for planning permission and permission in principle brought forward under the <u>Town and Country Planning Act 1990</u>.

This provision under the Act is not yet in force. The Act will have a phased implementation of its various provisions. Some matters will require secondary legislation and further public consultation. The State Party (following a change of government) is currently considering the scope of planning reform it wishes to bring forward. It will update the World Heritage Centre further on its plans for the implementation of this measure in due course once there is further information to share.

4. Also <u>acknowledges</u> the progress made in the finalization of the Management Plan and requests the State Party to submit it to the World Heritage Centre for review by the Advisory Bodies prior to adoption;

The State Party acknowledges that the timetable for update to the WHS Management Plan has altered since the last State of Conservation Report. However, work is continuing and data is currently being collected through an informal public consultation with both steering group stakeholders and the wider community.

A website has been set up to seek feedback and this also provides updates on progress and timescales - <u>Have Your Say Today</u> - <u>Westminster World Heritage Site Management Plan</u> - <u>Commonplace</u>. This mechanism for public consultation aims to raise awareness of the Council and Steering Group's work in support of the management plan and the importance of the property. The Commonplace format facilitates wide participation in this process and will allow Westminster Council to obtain feedback on certain elements of the draft plan as it evolves.

A particular area of focus is the attributes of the property, recognising the importance of how these encapsulate the Outstanding Universal Value of the site (as expressed in the Statement of OUV) and as the basis for insightful heritage impact assessment.

A full draft of the WHS Management Plan is in production and will take on board the public comments received. Further consultation will then be undertaken on a revised draft in late 2024. The State Party will ensure that, as requested, the Management Plan will be submitted to the World Heritage Centre for review in early 2025 once a full draft has been prepared, and prior to its adoption.

5. <u>Also welcomes</u> the revisions made to the new London Plan and Westminster City Plan, in line with Committee decisions, and also <u>requests</u> the State Party to submit the new framework for Annual Monitoring Reports (AMR) and the first new AMR to the World Heritage Centre for review by the Advisory Bodies;

#### London Plan Annual Monitoring Reports (AMR)

The first Annual Monitoring Report for the London Plan 2021 was published in May 2024 and a copy of this can be found on the <u>Greater London Authority website</u>. The new framework includes a key performance indicator (KPI) against which progress will be measured. The KPI for the impact of development on London's heritage is KPI 11. This identifies that the objective is to achieve a positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable applications (based on a rolling average). The associated dataset comprises analysis of the number of approved referable applications with identified benefits or harm to heritage assets, which includes World Heritage Sites. However, as this is the first time the data has been collected, no specific trends can be identified at this time. More analysis will be available in future reports, and the Greater London Authority is also reviewing the effectiveness of this indicator. There is intention for future monitoring to include additional KPIs that might assist in providing more specific information in relation to world heritage sites.

This information will also inform the review of the London Plan which is underway to ensure that it remains up to date. Early public and stakeholder engagement is in progress on a number of key policy areas. This provides a valuable opportunity to consolidate and enhance the understanding and protection of the attributes of Outstanding Universal Value of the London WHSs further from the positive progress made to date in relation to recommendations from the 2017 Reactive Monitoring Mission. The GLA are working towards adopting a new London Plan by 2027. Historic England will continue to advise the GLA to ensure that the sound framework provided by the existing Plan is maintained.

#### Westminster City Council Monitoring

Westminster City Council also maintain a database of small-scale applications of development proposals, consents and approvals within the World Heritage Site to allow for monitoring and review. Review of applications over the past two years demonstrates continued close working with Historic England who were consulted and provided advice on all the applications. Heritage Impact Assessments (HIA) are a requirement for applications within and affecting the property. The State Party understands that the quality of HIA submissions varies and this is being monitored by the Council, with support from Historic England in relation to individual applications.

#### Westminster City Plan

As set out in the State Party's 2022 State of Conservation report, Westminster City Council is undertaking a partial review to its City Plan, part of which involves incorporating a small number of Site Allocations. This review is ongoing and public consultation was undertaken between March and May 2024. The Council's target to adopt and finalise the policy is 2025.

As part of this process, an HIA screening process was undertaken. This determined that none of the sites selected as allocations were in close proximity to or likely to have any impact on the WHS and its OUV. However, for those sites closest to the property, the HIA makes clear that while impacts are considered unlikely given the distance, the height of any forthcoming

proposals will nonetheless need to be fully tested to ensure there is no impact on the protected silhouette of the Palace of Westminster, a key attribute of OUV. The State Party is aware that Historic England is working closely with the Council in development of this policy. Their advice is focused on ensuring that the height testing undertaken for these allocations is sufficient and that the allocations do not specify what heights are acceptable since this would need to be tested through individual applications. Historic England considers that this is the best way to avoid potential risk to the property and its OUV.

#### Lambeth Borough Council Local Plan

An update in response to the World Heritage Committee's request regarding Site Allocations under Lambeth Borough Council's Local Plan is included under the next section below.

6. <u>Notes</u> with concern the findings of ICOMOS technical reviews of the Evelina Children's Hospital extension of Saint Thomas' Hospital and the Royal Street Site planning applications, as well as the objections by Historic England to both applications, and <u>urges</u> the State Party not to grant planning permissions and to conduct a detailed study of the assets of the area south of the property in its immediate setting and how these assets relate to the Outstanding Universal Value (OUV) of the property, as a basis for the development of a Master Plan and to inform site allocations under the Lambeth Local Plan;

#### **Evelina Hospital and Royal Street Applications**

The State Party has separately issued a notification under paragraph 172 of the *Operational Guidelines* regarding the approval of the planning applications for the Evelina Hospital and Royal Street applications on 28 November 2024.

In both cases it was determined by the local planning authority that the substantial benefits, particularly those associated with life improving healthcare and support to life sciences, outweighed the harm caused.

The purpose of the State Party's planning system is to contribute to the <u>achievement of</u> <u>sustainable development</u>, and the UK Government has agreed to pursue the 17 Global Goals for Sustainable Development to 2030. This means that its planning system has 3 overarching objectives - economic, social and environmental - which are pursued in mutually supportive ways. In order to deliver the State Party's desire to achieve net gains across each objective, balanced and informed judgements are required when assessing different considerations within the context of the local and national policy framework. This approach is consistent with the recognition of the dynamic nature of living cities in the Historic Urban Landscape Recommendation (2011) and the need for a balanced and sustainable relationship between the needs of present and future generations and the legacy from the past.

#### Site Allocations under Lambeth Local Plan

The London Borough of Lambeth has continued to progress its Site Allocations Development Plan Document, which contains 13 site allocations, including two near the Westminster World Heritage Site – Royal Street and St Thomas Hospital. The State Party reported on both the planning application for the Royal Street site and the Site Allocations Development Plan Document (DPD) in July 2022, under paragraph 172 of the *Operational Guidelines*. This, followed the consultation under <u>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for the DPD</u>. ICOMOS' Technical Review of the proposed development on the Royal Street site was received in September 2022. Subsequently the DPD was further consulted on under <u>Regulation 19</u> between 8 March and 3 May 2024 and between 18 June and 13 August 2024.

Historic England provided advice throughout the development of the Site Allocations Development Plan Document and the individual site allocation policies. In that advice it paid particular attention to the potential impact that site allocations could have on the Westminster World Heritage Site, especially in relation to key Strategic views of the Palace within the property.

#### Masterplan

Historic England recommended that a master planning exercise was undertaken for all sites across the hospital campus. ICOMOS had supported this recommendation, indicating it had

concerns about fragmented developments being brought forward without an understanding of the morphology of the wider area, and how it supports the OUV of the property. Historic England considered that a masterplan could help to understand how development might be distributed across the area rather than focusing on a building by building approach, identifying if there was potential to deliver similar amounts of development with lesser impacts.

The State Party understands that this recommendation was discussed but that it has not been possible to progress it directly. The hospital indicated that, contrary to previous understanding, the two sites are in separate ownership and the situation is further complicated by the changing priorities and funding mechanisms to which it has to respond. The site allocation was identified as being the least sensitive part of the campus that would most benefit from a planned approach to development. Attention has therefore been focused on ensuring that the parameters and requirements for development provided under the local plan and the individual site allocations ensure that this understanding can be gathered to inform individual decisions. A key requirement is heritage impact assessment.

#### Heritage Impact Assessment

Historic England highlighted the need for heritage impact assessment (HIA), and the vulnerability of the property to cumulative harm. In September 2023, Lambeth undertook an <u>HIA</u> of the potential impact of the Royal Street and St Thomas Street site allocations (and their potential cumulative effects) on the Outstanding Universal Value of the Westminster World Heritage Site. The HIA draws on UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022). The assessment did not identify adverse impacts but offered opportunities to improve the setting and approaches of the property. A requirement for HIA was also included in the policy text for both the site allocation for Royal Street (SA1) and St Thomas' Hospital (SA2). This ensures that it is clear further, more detailed, HIA will be required at application stage.

#### Building Heights

Historic England's advice also addressed the consideration of the appropriateness of the proposed parameters for the height of development on the sites. ICOMOS had identified the need to protect the dominance of the Palace of Westminster in its Technical Review. Historic England identified that the heights specified might be appropriate as a maximum in some areas, but were unlikely to be achieved everywhere without causing harm. The policy wording was strengthened based on this advice and now identifies maximum heights to be assessed based on cumulative impacts at the time any application comes forward, associated with the process of HIA. Changes made in relation to maximum heights such as to protect the silhouette of Elizabeth Tower within the property are also noted to have the effect of suppressing height across parts of the site to address these concerns.

As a result of the cooperation on these topics, Historic England was able to indicate that it considered the Site Allocations Development Plan Document appeared to be sound in May 2024.

7. <u>Further welcomes</u> the information provided on the data sharing platform, the database for tall buildings, and the use of this data for 3D models and <u>also encourages</u> the State Party to actively use the digital data and 3D modelling for long-term planning and management of development, such as in the area south of the property in its immediate setting, to effectively safeguard the OUV of the property and in particular its integrity from any visual impacts;

As previously reported, Historic England, the GLA, Westminster City Council and other London boroughs adjoining the World Heritage Site are all now actively using 3D digital modelling systems including <u>VU.CITY</u> as a tool to assess cumulative effects, although its use is not yet universal. VU.CITY is an interactive 3D city model and digital twin software for planning and design.

The digital model shows both consented and built schemes within the vicinity of the property. It allows different proposals to be visualised together and the cumulative impact analysed. This continues to be used in assessment of development and in particular has helped to inform work on site allocations. Historic England supports the use of digital planning tools such as VU.CITY in assessing changes to the historic environment. It regularly uses VU.CITY to assist negotiations, and to support planning advice, particularly regarding tall building proposals.

#### Update of the London View Management Framework

The use of digital models and consideration of impacts of consented and built schemes is also being used to inform changes to the London View Management Framework which will seek to strengthen protection to the World Heritage Site.

The London View Management Framework (LVMF) supplementary planning guidance was adopted in 2012 to support the London Plan in providing protection for important views across the capital that help define the city. The LVMF provides visual management guidance relevant to protection of Westminster's attributes of OUV for those river prospect and townscape views within which it can be appreciated.

The LVMF provides guidance on the management of 27 strategic views that are designated within the London Plan (2021). These strategic views aim to safeguard the setting of landmarks including London's three Strategically Important Landmarks and World Heritage Sites. In respect to the Westminster World Heritage Site, there are ten views which include the world heritage site which the guidance manages in order to protect the composition and character of these views and the setting of the world heritage site.

A review of the LVMF is being carried out as part of the London Plan Review to improve the guidance and provide an evidence base to support development of the new London Plan. The LVMF review will consider the protection given to Westminster's protected silhouettes and explore a range of options including whether this could be strengthened under the guidance. It is anticipated that a draft consultation version of a revised LVMF will be published in spring/summer 2025. As indicated in Section 4 of this report the State Party will ensure that the World Heritage Centre is updated further on this review in due course.

8. <u>Takes note</u> of the updates provided by the State Party regarding the Restoration and Renewal (R&R) project for the completion of the Palace of Westminster and the Conservation Management Plans, as well as the ongoing restoration and repair works, and the need for an ongoing Heritage Impact Assessment (HIA), <u>further requests</u> the State Party to submit to the World Heritage Centre the details of the proposed Parliament Square Streetscape project, at an early stage, if the project proceeds beyond the concept stage, and <u>reiterates its request</u> to the State Party to submit the details, including HIAs, of the R&R project to the World Heritage Centre for review by the Advisory Bodies, as soon as they are available and prior to any decision or approval;

#### **Restoration and Renewal**

A number of developments have continued to progress since the last State of Conservation Report was submitted in 2022 which the State Party sets out below.

In its 2022 State of Conservation Report the State Party reported that the two parliamentary House Commissions had concluded that the Sponsor Body should be abolished and replaced by a joint department of both Houses (the Client Team), which would be overseen by a Client Board (the two Commissions meeting together) and a Programme Board, drawn from the Commissions, senior managers in both Houses and independent members with appropriate expertise.

The Restoration & Renewal (R&R) Client Board was established in September 2022. The R&R Client Board is responsible for making critical strategic choices and recommendations relating to the restoration and renewal of the Palace of Westminster. The Restoration & Renewal (R&R) Programme Board was established in February 2023. The R&R Programme Board is responsible to direct and have oversight of the restoration and renewal of the Palace of Westminster. Both Boards have been integrated into existing Parliamentary structures through the two Houses' Commissions and are supported by a new joint department called the R&R Client Team established in January 2023.

Between March and June 2023, the Programme Board examined 6 levels of scope and 6 different ways that the programme of works could be delivered, the main differentiator for the latter being the extent of the decant required from the Palace while the works are undertaken. Through a series of meetings and workshops, the Board set out to identify one or a small number of options to take forward for further design work to inform a later decision on fully costed proposals for the works, as required under the 2019 Parliamentary Buildings (Restoration & Renewal) Act. The 36 combinations were considered against a range of criteria, including: value for money, health and safety implications, likely disruption to the work of Parliament, and lasting benefits (which include those for the World Heritage property), including improvements to its accessibility and social, economic and environmental sustainability. The Programme Board concluded that a reasonably ambitious scope for the works represented the best value for money. This is expected to deliver improvements in the following areas which include activities that will directly sustain the property's OUV:

- Historic building fabric conservation;
- health and safety, including fire safety and addressing the risks posed by asbestos;
- renewal and expansion of mechanical, electrical and other services;
- air ventilation and heating and cooling to rooms and offices;

- security protection measures; and
- accessibility—including to improve audibility and increase step-free access, with the greatest improvements in the most visited and used areas of the Palace and an average enhancement from the current 12% step free access to circa 60% across the Palace.

The Programme Board decided that two options for how to deliver the works should be taken forward:

- both Houses moving out for the majority of the works, with the House of Commons prioritised for an earlier return (a full decant option); and
- the House of Lords moving out for the duration of the works while the Commons Chamber and essential support functions remain in the Palace in varying locations throughout the works (a continued presence option).

The Client Board accepted the recommendations of the Programme Board but considered that further work should be undertaken on a third option of enhanced maintenance and improvement (EMI) for restoring the Palace through a rolling programme of works during which neither House would fully decant. Further work on the 3 options is currently being undertaken before the submission of costed proposals for each to both Houses in 2025.

The State Party has ensured, including through Historic England's advice, that the R&R project continues to be mindful of the specific request from the World Heritage Centre regarding submission of details, including HIAs of the project for review by the Advisory Bodies as soon as they are available. The State Party can report that work on HIA is ongoing alongside the consideration of the impacts of the various options for delivery of the essential works to the Palace.

An essential part of the assessment needed to contribute to the ongoing HIA involves an understanding of potential archaeological impacts which will inform future design work. A series of archaeological investigative works have therefore been commenced. These include evaluation, trial pits and geoarchaeological work all of which is intended to support development of a fuller understanding of the potential for archaeological survival at the Palace.

The State Party will continue to keep the World Heritage Centre updated on the further development of the Restoration and Renewal project. Initially, a framework document setting out the R&R project's approach to HIA is likely to be submitted for consideration by the World Heritage Centre and the Advisory Bodies in 2025. This will help to develop a robust methodology that will support Parliament's consideration of the project and options for its delivery.

#### Ongoing conservation works to the Palace of Westminster

Further to the information provided in the 2022 State of Conservation Report, minor ongoing works of conservation and repair continue at the Palace of Westminster. An overview of progress on areas previously reported is set out below.

The Mechanical, Electrical, Public Health and Fabric Safety Programme (MEPFS) to mitigate failing systems and address urgent fabric issues has been completed. Further phases of the flat roof repairs are in development which include repair options for the original patent slate flat roofs.

The first stage of the Flat Roofs, Stone Conservation and Mechanical, Electrical, Public Health and Fire Safety (MEPF2) projects is nearing completion. The proposals are designed to be phased and prioritised to ensure the best efficiencies in both repair and delivery are achieved. The delivery strategy continues to be developed in collaboration with R&R.

The works to the north façade of Westminster Hall are progressing, with further tactile surveys and condition reports completed to inform the design stage conservation repairs.

The Victoria Tower Project is in procurement and the works on site are planned to start in 2025. The scope of the project, to repair the stonework on the exterior of the tower to minimise the risk of stone fall has not changed. It will also encompass other elements such as conservation works to the window glazing, roof turrets and flagpole.

The Cast Iron Roofs Project (CIR) has completed roof repairs to Star Chamber Court north and St Stephen's Porch and Hall. The next phase of CIR repairs to Royal Gallery and House of Lords Chamber roofs is in design development. The adjacency to the Victoria Tower project is being carefully managed to ensure temporary works can progress without detrimental impact to either project or the wider Palace of Westminster.

In addition a lighting project in Westminster Hall is on site, with a planned completion date by the end of 2024. The project will significantly increase the visibility of the medieval roof structure, as well as increase low light levels in St Stephen's Porch and reduce energy consumption by using LED lamps. The windows are currently obstructed by the event/broadcast lighting rigs and these will be replaced with discrete low-level fittings to let more natural light into the Hall.

Estate-wide infrastructure improvement programmes to improve digital and data capabilities are also being delivered in phases. Critical security improvements to the estate perimeter are also being made such as installing new accessible security screens to Peers Entrance, as discrete infills to the north and south arches of the portico.

Where formal applications for planning or other consents are required and the State Party considers these would require notification, these elements of ongoing works will be reported separately under Paragraph 172 of the *Operational Guidelines* at the appropriate time.

#### **Parliament Square Streetscape Project**

The Parliament Square Streetscape Project: Concept Development (PSSP) is a proposal to improve the security, safety and public space in and around Parliament Square. The State Party last reported on the consideration of this project in its 2022 State of Conservation Project.

The project is considering the feasibility of removing general traffic from the south and east sides of Parliament Square, which would potentially improve the setting and Outstanding Universal Value of the World Heritage Site.

Over the past year the project has continued developing conceptual designs for security and highways enhancements, taking into account existing and potential future operational requirements. The project has undertaken further modelling to test the feasibility of the changes to the highway network and is preparing a business case to establish the likely benefits and costs of the scheme.

In August, the project appointed public realm designers to begin to develop concept designs for Parliament Square. This work will give full consideration to the setting and Outstanding

Universal Value of the World Heritage Site and will include preparation of a Heritage Impact Assessment of the concept design, drawing on the guidance in UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022), which will initially be shared with the Westminster WHS Steering Committee when it is ready. All proposals and designs will be subject to extensive stakeholder and public consultation, which will include Westminster WHS Steering Committee and its members.

However, the State Party would stress that no decision has yet been taken about whether the project will proceed beyond this concept phase, which is subject to further business case approval. Should the proposals progress beyond the concept phase, the State Party confirms that they will be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* at an early stage, as requested by the World Heritage Committee.

9. <u>Further notes with concern</u> that the State Party has introduced legislation to remove the obstacle that led the High Court to quash the decision to build the Holocaust Memorial and Learning Centre in Victoria Tower Gardens, <u>reiterates its serious concerns</u> that the proposed location of the Holocaust Memorial and Learning Centre in Victoria Tower Gardens would have a significant adverse impact on the OUV of the property, and therefore <u>requests</u> the State Party to refrain from any action which would allow the current proposal to proceed, and to seek alternative locations and/or designs;

The State Party remains committed to the creation of a new national Holocaust Memorial and Learning Centre in Victoria Tower Gardens. The longstanding commitment is being taken forward by the new Government, with continued cross-party support. Victoria Tower Gardens was identified as a site uniquely capable of meeting the UK Government's aspiration for the national Memorial and Learning Centre, close to buildings and memorials that symbolise our nation and its values.

The impacts of the proposed scheme on the historic environment and heritage assets were examined in great detail at a Public Inquiry, including advice and representations from statutory consultee Historic England. Having considered all the evidence presented, the Planning Inspector concluded in his report that the scheme "would not result in compromise to the OUV of the WHS because it does not harm it or its setting, thus conserving it"<sup>1</sup>.

#### Update since last State of Conservation report

On 15 March 2023, the State Party provided a notification under paragraph 172 of the Operational Guidelines, informing the World Heritage Centre that the State Party had introduced legislation on 23 February 2023 to deal with the statutory obstacle which had led to the loss of planning consent. The *Holocaust Memorial Bill* will establish that the obligation in the London County Council (Improvements) Act 1900 to maintain Victoria Tower Gardens as a public garden, does not prevent the building of a new Holocaust Memorial and Learning Centre there.

Following introduction the Bill was found to be hybrid meaning a longer passage through Parliament because of additional stages required in both Houses to hear from people who are specially and directly affected by the Bill's provisions. Having passed the House of Commons unamended in the 2023-24 session, the Bill was introduced by the new Government and is now before the House of Lords in the 2024-25 session.

The Bill will not change the status of Victoria Tower Gardens. They will remain a 'garden open to the public' as the 1900 Act requires.

#### Future Timetable

The Bill does not provide powers to construct the Memorial. Planning permission will still be needed through the normal planning process. The Government's aim is to remove the statutory obstacle ahead of a new planning decision being taken. We do not yet have an indication of when the decision will be retaken.

The State Party will continue to keep the World Heritage Centre updated on the latest developments of this project.

<sup>&</sup>lt;sup>1</sup> <u>Called-in decision: Victoria Tower Gardens, Millbank, London (ref: 3240661 – 29 July 2021)</u> (Paragraph 15.110)

10. Finally requests the State Party to submit to the World Heritage Centre, by 1 December 2024, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 47th session.

The State Party submits this report in response to the Committee's request.

The State Party confirms its continued commitment, for all the UK's World Heritage sites, to notifying the World Heritage Centre of any major restorations or new constructions which may affect the Outstanding Universal Value of the property under the Paragraph 172 obligation, and to continuing to submit HIAs for any new developments.

The State Party also requests a dialogue meeting with the World Heritage Centre in early 2025 in order to answer any clarifications or questions arising from this State of Conservation Report.

# 3. <u>Other current conservation issues identified by the State Party which may have an impact on the property's Outstanding Universal Value</u>

## **Temporary Education Centre at the Palace of Westminster**

The temporary Education Centre for the Palace of Westminster is located at the northern end of Victoria Tower Gardens, adjacent the Palace. There has been an explicit mandate for the provision of a dedicated Education Centre since 2007 and education visitors are regarded as a priority audience.

The Joint ICOMOS/ICCROM Reactive Monitoring Mission 2017 report noted that the Mission considered the temporary education centre structure did not positively contribute to the World Heritage Site's Outstanding Universal Value. In recommendation 16 it refers to its demolition and development of an updated visitor and interpretation and management strategy. Whilst the need for improvements is acknowledged the temporary centre has performed an essential function over the last 9 years, contributing to the presentation and transmission of the property's OUV to its students.

The single storey Education Centre was purpose built in 2015 to provide learning opportunities for students as part of the tailored educational sessions on the Houses of Parliament. The Centre provides five teaching and learning spaces as well supporting ancillary spaces such as a lunchroom and staff areas. Sessions are offered to students from across the UK and last 1.5 hours, including a tour of the Palace of Westminster and Q&A with the school's local MP.

The Education Centre's award-winning programme of educational visits for schools welcomes over 80,000 children and their teachers each year during term times. Over half a million Centre visitors from across the home nations have visited the Centre's facilities since opening to learn about the work of the UK Parliament and see history being made first-hand.

Temporary permission was originally granted for the Education Centre in 2014 (13/07747/FULL) for a period of 10 years only, and this was due to expire in 2025. A further extension of time (24/02303/FULL) has recently been granted to allow for a longer-term solution to be agreed. The decision letter specifically notes that any further extension of time would not be supported, and refers to the findings of the Mission and their report. A longer term solution is being sought as part of the Restoration and Renewal programme. The State Party will ensure that information about a permanent education offer at the Palace is notified under Paragraph 172 at the earliest opportunity.

#### Ongoing conservation works at Westminster Abbey

As at the Palace of Westminster, conservation of Westminster Abbey requires an ongoing programme of work. This is informed by quinquennial inspections and reports on the fabric of the building to develop a prioritised list of fabric restoration and maintenance projects for the following five-year period. The Quinquennial Inspection for 2024 is well underway for the main Abbey building, St Margaret's Church and also the precinct buildings. The State Party understands that it is due to be issued to the Abbey in draft before the end of the year.

Amongst the works undertaken to improve the fabric of the Abbey buildings since the last State of Conservation report was submitted in December 2022 are:

- the installation of a new boiler and Building Management System in St Margaret's Church,
- new drainage for Masons Yard,
- the replacement of flashings on the North Transept roof,

• repairs and protection with lead to the stonework of the north porch, which being on the northern aspect of the building is very badly saturated.

In recognition of the challenges posed by climate change, the Abbey has also embarked on a major programme of environmental work, which will include improving insulation in Abbey buildings and installing secondary glazing within the estate. The Abbey has also been developing plans to achieve net zero emissions in the medium to long term, including the use of renewable energy sources such as district heating and solar panels. The State Party will ensure that further information on this programme will be submitted under paragraph 172 of the *Operational Guidelines* to provide the World Heritage Committee with a further understanding in due course.

# 4. <u>In conformity with Paragraph 172 of the Operational Guidelines, describe any</u> potential major restorations, alterations and/or new construction(s) intended within the property, the buffer zone(s) and/or corridors or other areas, where such developments may affect the Outstanding Universal Value of the property, including authenticity and integrity

The State Party is aware that constructive engagement at an early stage and appropriate heritage impact assessment are being demonstrated to successfully avoid impacts on the property's OUV with schemes that would otherwise have been notified under Paragraph 172.

Since the last State of Conservation Report was submitted in November 2022, the State Party, based on advice from Historic England, has continued to consider the need for notifications under Paragraph 172 of the *Operational Guidelines*.

The State Party expects the following draft policy documents to be notified under Paragraph 172 in due course:

- London View Management Framework (spring 2025)
- London Plan (2025)
- Westminster World Heritage Site Management Plan (early 2025)
- Westminster City Plan Site Allocation Heritage Impact Assessments (2025)

These policy documents are important components of the property's management system. They will benefit from engagement from ICOMOS within the timelines set for public consultation.

Awareness of the particular concerns expressed by the World Heritage Committee will inform decisions about which cases should be notified, including in relation to individual applications at pre-application stage or for planning permission within, and within the setting of, the property. Future notifications will include Westminster Abbey's current programme, including environmental work in recognition of the challenges posed by climate change and to transform how visitors are welcomed to the Abbey through improved accessibility, security and ticketing.

## 5. Public access to the State of Conservation report

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

## 6. Signature of the Authority

Henry Reed Senior International Policy Adviser Department for Culture, Media and Sport