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Your Ref
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Dear Francesco

State of Conservation of the Tower of London (United Kingdom) (C 488)

I refer to the World Heritage Committee's Decision **33 COM 7B.127** following examination of the state of conservation of the Tower of London World Heritage property at its 33rd session (Seville, Spain, 22-30 June, 2009).

In accordance with paragraph 8 of Decision **33 COM 7B.127**, I am pleased to submit to the World Heritage Centre a report on the State of Conservation of the property, using the indicative format, for examination by the World Heritage Committee at its 35th session in June of this year.

I am pleased to report that the UK has made substantial progress on all of the issues identified in relation to the Tower of London World Heritage property and have addressed the points raised on a paragraph by paragraph basis below for ease of reference.

Protection of World Heritage Sites in England and their Outstanding Universal Value has been strengthened by the following publications:

- *Circular 07/09 Circular on the Protection of World Heritage Sites*
(<http://www.communities.gov.uk/publications/planningandbuilding/circularworldheritage>)
- Accompanying English Heritage guidance to Circular 07/09 *The Protection and Management of World Heritage Sites in England* and *Planning Policy Statement 5 Planning for the Historic Environment* (March 2010)
(<http://www.englishheritage.org.uk/professional/advice/government-planning-policy/world-heritage-planning-circular/>)
- *PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide* (March 2010)
(<http://www.english-heritage.org.uk/professional/advice/government-planning-policy/a-new-planning-policy-framework/pps-practice-guide/>)

In parallel, in London *The London Plan: Spatial Development Strategy for Greater London* is undergoing its regular statutory revision. The Consultation Draft 2009 has now been examined in public and is with the government appointed independent Planning Inspector whose report is expected in Spring 2011. Extracts from the October 2009 London Plan and a consolidated set of revisions are contained in **Appendix A** to this letter.

<http://www.london.gov.uk/sites/default/files/eip/CD21GLAUpdatedConsolidatedDRLP.pdf>

- 1 Response from the State Party to the World Heritage Committee's Decision, paragraph by paragraph

[Note: this information has to refer to developments over the past year or since the last decision of the Committee for this property]

The World Heritage Committee,

- 1 Having examined Document *WHC-09/33.COM/7B*,
- 2 Recalling Decision **32 COM 7B.112**, adopted at its 32nd session (Quebec City, 2008),
- 3 Notes the information provided by the State Party, in particular that the work is progressing on a brief to define a local setting, for the final publication "Seeing the History in View: a method for Assessing Heritage Significance within Views" in 2009, and that considerations are underway on how a Dynamic Visual Impact Study fits within the planning system, and that a draft revised London Plan is to be published for public consultation in 2009;

Noted.

- 4 Regrets that a buffer zone with protection has still not been put in place;

Noted. Further comments by the State Party are set out in para. 6 (c) below.

- 5 Also regrets that there is no overall study of the setting of the Tower yet in place that would allow a full impact assessment of proposed development;

We are pleased to inform the World Heritage Committee that an overall study of the setting of the Tower was completed in August 2010. The study, '*Tower of London Local Setting Study*' describes the character and condition of the Tower's local setting and sets out aims and objectives for conserving, promoting and enhancing appreciation of the OUV of the World Heritage property and more specifically addresses Objective 3 of the Tower of London World Heritage Management Plan "*to act in partnership with statutory authorities to safeguard and enhance the local setting of the Tower*". The study is referred to in more detail in Para. (6 c) below and the document has been forwarded to the World Heritage Centre by courier today.

National policy set out in Circular 07/09 and PPS 5 requires planning authorities to include appropriate policies for the protection and sustainable use of World Heritage Sites. In devising specific policies, planning authorities are required to take account of the need to protect, conserve and sustainably use World Heritage Sites and relevant extracts from planning documents are set out in **Appendices A and B**.

The spatial planning system in England requires applicants to submit impact assessments of their proposals where heritage assets such as World Heritage Properties are affected. For large schemes this will be in the form of a full Environmental Impact Assessments which incorporate sections on heritage significance, visual and other impacts. In the case of smaller schemes details will usually form part of a Design and Access Statement. The 2008 approved Statement of Significance and the 2011 draft Statement of Outstanding Universal Value (**Appendix C**) awaiting approval by the World Heritage Committee are material considerations in the spatial planning system.

6 Requests the State Party to ensure that:

- a. *The original intentions of the suggested "Skyline Study" are incorporated in related work being progressed as part of the Dynamic Visual Impact Study and the London Views Management Framework,*

The original intentions of the Skyline study were to identify key views, and provide an effective form of protection for the Tower of London World Heritage property. As previously notified to the World Heritage Committee (18 February 2009), the original intentions of the Skyline study have long been overtaken by, and are incorporated in the DVIS methodology (**Appendix D**) and the London View Management Framework (LVMF).

In view of this, the UK requests that any reference to "skyline study" be omitted from future draft decisions.

As we have also previously reported to the World Heritage Committee, the LVMF contains a statutorily protected view of the Tower. Further details on this are set out in para. 6 (b) below. The policies provide stronger protection for heritage assets in London, particularly in relation to World Heritage properties, in particular the designation of a defined Protected Silhouette for the Tower of London. In addition, Supplementary Planning Guidance is being produced which will set out guidance for defining the settings of World Heritage properties in London, particularly in relation to managing change reflecting the UK Government's principles contained in PPS5. Work on the World Heritage Site Settings SPG is currently underway.

Work has continued on the *Seeing the History in the View* main text and publication of this is anticipated by Spring 2011. As part of a package of work supporting *PPS5 Planning and the Historic Environment*, English Heritage has produced *The Setting of Historic Assets English Heritage Guidance*; the consultation closed on 26 November 2010 and a final publication is expected Summer 2011. Cross referencing between the *Seeing the History in the View* text and the *Setting of Historic Assets* text is underway.

- b. *The new Mayor's review of the supplementary planning guidance, the London Views Management Framework, fully takes into account the relevant views of the November 2006 joint World Heritage Centre / ICOMOS mission,*

The *Revised Supplementary Planning Guidance - London View Management Framework* (LVMF) was published in July 2010 and has been developed with due regard to the views of the November 2006 joint World Heritage Centre/ICOMOS mission. The revised SPG strengthens protection for the Tower of London World Heritage property by:

- designating the Tower of London as a Strategically Important Landmark;

- requiring planning authorities to consult with English Heritage, Historic Royal Palaces and the Tower of London World Heritage Site Consultative Committee on applications affecting World Heritage Sites and their settings; and
- requiring that "*development in the background of a Designated View should give appropriate context to landmarks and should seek to preserve or enhance the setting of Strategically Important Landmarks, World Heritage sites or other landmark buildings that contribute to the special characteristics of the view and that development that exceeds the threshold plane of the Landmark Viewing Corridor of a Protected Vista should normally be refused*".

The LVMF SPG also defines a Protected Silhouette for the Tower of London, which is further protected through kinetic visual assessment. Policies to protect the Tower of London World Heritage property are included in the emerging Local Development Frameworks of the City of London, London Borough of Tower Hamlets and London Borough of Southwark local authorities and these are set out in **Appendix B** to this letter.

- c. *The sub-group of the Tower of London World Heritage Site Consultative Committee, fully considers the need for protection of the immediate surrounding of the Tower of London through an adequate and commonly agreed buffer zone;*

As mentioned in response to para. 5 above, the Tower of London Consultative Committee commissioned a study of the setting of the Tower of London, 'Tower of London Local Setting Study' which was completed in August 2010 and adopted in November 2010.

The local setting is defined in the Tower of London World Heritage Site Management Plan 2007 as "*the spaces from which the Tower can be seen from street and river level and the buildings that provide definition to those spaces.... The immediate setting of the Tower is that part of the local setting that is on the North Bank as illustrated in the LVMF*".

The study sets a detailed analysis of the local setting and has been produced by consultants in collaboration with representatives from the City of London, London Borough of Tower Hamlets, London Borough of Southwark, the Greater London Authority, English Heritage and Historic Royal Palaces. It has been developed with reference to the emerging draft Statement of Outstanding Universal Value for the Tower of London. The draft SOUV was submitted by the UK State Party to the World Heritage Centre for approval by the World Heritage Committee on 1 February 2011 and is attached as **Appendix C** to this letter.

A series of recommendations have been made including development of an overall vision, recommendations for public realm improvements and development parameters to preserve, protect, promote, conserve and enhance the Tower of London World Heritage Site. Discussions are underway with the relevant planning authorities on the adoption of the document as part of their planning policies.

- 7 *Urges the State Party to progress towards a buffer zone as soon as possible and bringing together guidance on visual impact in order to put in place a coherent approach;*

Many pre 1997 inscriptions, such as the Tower of London, do not have buffer zones; consideration of the need for a buffer zone usually takes place as part of the Management Plan review whilst examining existing boundaries and protective measures. The UK State

Party does not consider that buffer zones are necessary in every case particularly where adequate layers of protection already exist. This follows the policy set out in the Operational Guidelines (2008).

In the case of the Tower of London the report on the local setting has just been finalised and together with the policies in the emerging planning documents these provide a wider framework to ensure that the Tower of London and its setting are conserved.

The London Borough of Southwark is currently preparing a consultation supplementary planning document for Bankside, Borough and London Bridge.

- 8 Also requests the State Party to submit to the World Heritage Centre, by **1 February 2011**, a report on the state of conservation of the property and on the steps taken to implement the recommendations set out above, for examination by the World Heritage Committee at its 35th session in 2011, **with a view to considering, in the absence of substantial progress, the possible inscription of the property on the List of World Heritage in Danger.**

This State of Conservation report sets out the State Party response above on the recommendations.

The State Party respectfully would like to draw the attention of the World Heritage Committee to the wording of this paragraph and would like to remind the Committee that at its 32nd session in Quebec the same text was presented in the draft Committee decisions relating to both the Tower of London and Westminster world Heritage properties. Time constraints at the Quebec Committee meeting meant that only the Westminster State of Conservation report was opened and therefore only the Westminster decision could be amended in light of the discussions. In this case the phrase "with a view to considering in the absence of substantial progress, the possible inscription of the property on the List of World Heritage Sites in Danger" was removed from the draft Decision because of the level of progress made at Westminster resulting in a revision to paragraph 7 of Decision **32 COM 7B.113**.

During the course of the meeting Committee members and World Heritage Centre staff were made aware of the parallels between the Westminster and Tower World Heritage properties and the way in which protections were applied. The State Party considered that the revisions to the text should also have been applied to the Tower of London since similar progress had been made there. The UK State Party was assured that this point would be recorded in the summary record of the 32nd session but we regret that this has not happened. We believe that there was then, and is now, no case for including any reference to future In-Danger listing of the Tower of London.

The UK requests that, subject to the Committee being satisfied that substantial progress has been made, reference to 'the possible inscription of the property on the List of World Heritage in Danger' be removed from the Committee's Decision at its 35th session in June of this year.

2 Other current conservation issues identified by the State Party

[Note: conservation issues which are not mentioned in the Decision of the World Heritage Committee or any information request from the World Heritage Centre]

The substantial programme of conservation work on the White Tower is now complete. Conservation work to the Tower on the Outer Curtain Wall continues.

A tree strategy is now in place which aims restore, develop and manage the tree planting at the Tower to enable the architecture and military function of the Tower to be appreciated and associated amenity space to be enjoyed now and in the future.

3 In conformity with paragraph 172 of the *Operational Guidelines*, please describe any potential major restorations, alterations and/or new construction(s) within the protected area and its buffer zone and/or corridors that might be envisaged.

The Property is located on the edge of the City of London a thriving commercial area in an area where there is intense change.

There have been a number of tall buildings to the north west of the Property since before its inscription and this has developed into a cluster of such buildings with permission granted for buildings such as the Gherkin (Swiss Re building constructed on the site of the Baltic Exchange demolished by a terrorist bomb in the 1990s). Permission was recently granted by the Secretary of State Communities and Local Government for redevelopment of 20 Fenchurch Street with a 91m building being replaced by a 160m building.

The Shard of Glass tower located at London Bridge, over a kilometer away from the Tower of London and previously notified to the Committee, has now started construction.

On the south bank of the River Thames a new 31 storey building called The Quill has been proposed on St Thomas's Street adjacent to St Thomas's hospital. This has been granted permission by the London Borough of Southwark and has been called in by the Secretary of State for consideration.

The final vacant development site Pottersfield lies directly opposite the Tower of London on the south bank of the River Thames between London Bridge and Tower Bridge. Planning permission has been granted for a mixed use scheme with a slender 21 storey tower. This replaces an earlier scheme which was opposed because of its impact on the Tower of London and Tower Bridge and the new scheme is considered less intrusive.

Please let me know if you require any further information.

Yours sincerely



Peter Marsden
Head of World Heritage

Cc HE Matthew Sudders, UK Permanent Delegate to UNESCO
UK National Commission for UNESCO
ICOMOS
English Heritage

Extracts from the Consolidated Revisions to the October 2009 London Plan arising out of Examination in Public (Inspector's report is currently awaited)

<http://www.london.gov.uk/sites/default/files/eip/CD21GLAUpdatedConsolidatedDRLP.pdf>

Policy 7.4 Local character

Strategic

A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an **enhanced** character for the future function of the area.

Planning decisions

B Buildings Development **Buildings, streets and open spaces** should provide a contemporary architectural **high quality design** response that:

a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass

b contributes to a positive relationship between the urban structure and local natural landscape features, including the underlying landform and topography of an area

c is human in scale, **ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surrounding**

d allows existing buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area

e is informed by the surrounding historic environment.

LDF preparation

C Boroughs should **consider the different characters of their areas** to identify landscapes, **buildings and** places, including on the Blue Ribbon Network, and buildings that have a **where that** character that should be sustained, and protected them **and enhanced through managed change**. **Characterisation studies can help in this process.**

7.12 The social, cultural, environmental and economic relationships between people and their communities is reinforced by the physical character of a place. **Based on an understanding of the character of a place**, New development should help residents and visitors understand where a place has come from, where it is now and where it is going. It should reflect the function of the place both locally and as part of a complex urban city-region, and the physical, economic, environmental and social forces that have shaped it over time and are likely to influence it in the future. **Local character does not necessarily recognise borough boundaries. The Mayor therefore encourages cross borough working to ensure a consistent approach to understanding and enhancing a sense of character. The Mayor will consider developing supplementary guidance to help Boroughs with this work.**

7.13 The physical character of a place can help reinforce a sense of meaning and civility – through the layout of buildings and streets, the natural and man-made landscape, the density of development and the mix of land uses. In some cases, the character is well preserved and clear. In others, it is undefined or compromised by unsympathetic development. **Through characterisation studies**, existing character should **can** be identified **and valued**, and used to inform a strategy for improving the place. This should help ensure the place evolves to meet the economic and social needs of the community and enhances its relationship with the natural **and built** landscape. The community should be involved in setting these goals for the future of the area (Policy 7.1).

7.14 The Blue Ribbon Network has significant cultural, **historic**, economic and environmental value to local character. Later in this chapter a range of policies require buildings and spaces to have particular regard to their relationship to waterspaces in their form, scale and orientation. New development should enhance physical and visual access between existing streets and waterfront sites and, incorporate features that make the best functional use of the site's proximity to a water resource. Buildings and spaces should be designed to activate the Blue Ribbon Network in a way that is appropriate to its character, infrastructure value and historical **heritage** significance.

Policy 7.5 Public realm

Strategic

A London's public spaces should be secure, accessible, **inclusive, connected**, easy to understand and maintain, **relate to local context**, and incorporate the highest quality **design**, landscaping, planting, **street** furniture and surfaces.

Planning decisions

B New Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks **as appropriate**, to help people find their way. Landscape treatment, **street** furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening, such as through planting of trees and other soft landscaping wherever possible, should be maximised. Treatment of the public realm should be informed by the history **heritage values** of the place, **where appropriate**.

C New Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. New **development** It should also reinforce the connection between public spaces and existing local features such as heritage landmarks, the Blue Ribbon Network and parks **and others that may be of heritage significance**.

LDF preparation

D Boroughs develop local objectives and programmes for enhancing the public realm, ensuring it is accessible for all and reflects the principles in Policies 7.1, 7.2 and 7.4

7.15 The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, **as well as having an influence on a range of health and social factors**. For this reason, public and private open spaces, and the buildings that

frame those spaces, should contribute to the highest standards of comfort, security and ease of movement possible. **Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm (see Policy 7.18).** Legibility and signposting can also make an important contribution to whether people feel comfortable in a place, **and are able to understand it and navigate their way around.** On going maintenance of this infrastructure should be a key consideration in the design of places.

7.15A The public realm should be seen as a series of connected spaces that help to define the character of a place. Places should be distinctive, attractive, vital and of the highest quality. They should also, wherever possible, make the most of opportunities to green the urban realm through new planting or making the most of existing vegetation. This will support the Mayor's aim for two million trees to be planted in London by 2025 and, greening in the Central Activities Zone (CAZ) will help mitigate the urban heat island effect (Policy 5.10). **Encouraging activities along the waterways can also contribute to an attractive townscape and public realm.**

7.15B The effects of traffic can have a significant impact on the quality of the public realm in terms of air quality, noise and amenity of the space. The negative effects of traffic should be minimised to ensure people's enjoyment of public realm is maximised. The principles of shared space should be promoted in line with Policy 6.10 on Walking and in the Mayor's Transport Strategy. They should be implemented in line with local context and in consultation with relevant stakeholders (including organisations of disabled and visually impaired people).

7.15D The lighting of the public realm also needs careful consideration to ensure places and spaces are appropriately lit, and there is an appropriate balance between issues of safety and security and reducing light pollution.

7.15D The public realm does not necessarily recognise borough boundaries. Cross borough working at the interface of borough boundaries should therefore be maximised to ensure a consistent high quality public realm. There is a range of guidance such as Better Streets¹⁴, Manual for Street¹⁵ and Principles of Inclusive Design¹⁶, and Streets for All¹⁷ which can help inform the design of the public realm. This should be part of a wider strategy based on an understanding of the character of the area.

Policy 7.6 Architecture

Strategic

A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Planning decisions

B Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately encloses **defines** the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly

residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design.

7.16 Architecture should contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting in the city. This is often best achieved by ensuring new buildings reference, not necessarily replicate, the scale, mass and detail of the predominant built form surrounding them, and by using the highest quality materials. Contemporary architecture is encouraged, but it should be respectful and sympathetic to the other architectural styles that have preceded it in the locality. All buildings should help create streets and places that are human in scale **so that their proportion and composition enhances, activates and appropriately encloses the public realm, as well as allowing them to be easy to understand easily understood, enjoyed and kept secured.** The building form and layout should have regard to the density and character of the surrounding development and should not prejudice the development opportunities of surrounding sites.

7.17 A building should enhance the amenity and vitality of the surrounding streets. It should make a positive contribution to the landscape and relate well to the form, proportion, scale and character of streets, existing open space, waterways and other townscape and topographical features, **including the historic environment.** New development, especially large and tall buildings, should not have a negative impact on the character or amenity of neighbouring sensitive land uses. Lighting of, and on, buildings should be energy efficient and appropriate for the physical context.

7.18 The massing, scale and layout of new buildings should help make public spaces coherent and complement the existing streetscape. They should frame the public realm at a human scale and provide a mix of land uses that activate its edges and enhance permeability in the area. The New buildings should **integrate high quality urban design whilst ensuring an appropriate balance with secure by design between designing out crime principles and appropriate levels of permeability (Policy 7.3) and provision of an accessible and inclusive environment (Policy 7.2).** find the best balance between urban design and secured by design principles (see Policy 7.3) while being highly accessible

7.19 New buildings should achieve the highest standards of environmental, social and economic sustainability by meeting the standards of sustainable design and construction set out in Chapter 5 and by being consistent with the existing or planned future capacity of social, transport and green infrastructure.

Policy 7.7 Location and design of tall and large buildings

Strategic

A Tall and large buildings should be part of a strategic **plan-led** approach to changing or developing an area **by the identification of appropriate, sensitive and inappropriate locations,**

and should not have an unacceptably harmful impact on their surroundings.

Planning decisions

B Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site of the proposed tall building is not identified as a location for tall or large buildings in the borough's LDF.

C Tall and large buildings should:

a generally be limited to sites in the Central Activity Zone, Opportunity Areas, Areas of Intensification or Town Centres that have good access to public transport

b only be considered in areas whose character would not be adversely affected by the scale, mass or bulk of a tall or large building

c relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;

d individually or as a group, form a distinctive landmark that **improve the legibility of an area, by emphasising** es a point of civic or visual significance **where appropriate**, and enhances the skyline and image of London

e incorporate the highest standards of architecture and materials, **including sustainable design and construction practices**

f have ground floor activities that provide a positive relationship to the surrounding streets

g **contribute to improving the permeability of the site and wider area, where possible**

gh incorporate publicly accessible areas on the upper floors, where appropriate

hi make a significant contribution to local regeneration.

D Tall buildings should not:

a **should not** affect adversely their surroundings in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference

b **should not** impact adversely on local or strategic views

c be encouraged in **certain areas need particular consideration to be given to** that are inappropriate or sensitive to **their the impacts** of tall buildings that would be sensitive to their impact. Such areas might include conservation areas, the setting of listed buildings **and their settings, registered** historic parks and gardens, **scheduled ancient monuments, battlefields**, the edge of the green belt or metropolitan open land, **World Heritage Sites** and their the settings and the outstanding universal values of World Heritage Sites or other areas designated by boroughs as being unsuitable inappropriate or **sensitive or inappropriate** for tall buildings.

LDF preparation

E Boroughs should work with the Mayor to identify areas in their Local Development Frameworks where tall and large buildings might be appropriate, **inappropriate or sensitive**. These locations should be consistent with the criteria above and the place-shaping and heritage policies of this Plan.

7.20 Tall and large buildings are those that are noticeably **substantially** taller than their surroundings, **cause a significant change** have a significant impact on the skyline¹⁸ or are larger than the threshold sizes set for the referral of planning applications to the Mayor. **Whilst high density does not need to imply high rise, tall and large buildings** they can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the

London Plan, particularly in order to make optimal use of the capacity of sites with high levels of public transport accessibility. However, they can also have a significant detrimental impact on local character. Therefore, they should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations; or **are able to enhance the qualities of their immediate and wider settings** best local design outcome, and or if they make a significant contribution to local regeneration.

7.21 Tall **and large** buildings should always be of the highest architectural quality, (especially prominent features such as roof tops **for tall buildings**) and should not have a negative impact on the amenity of surrounding uses. **Opportunities to offer improved permeability of the site and wider area should be maximised where possible.**

7.22 The location of a tall **or large** building, its alignment, spacing, height, bulk, massing and design quality should identify with and emphasise a point of civic or visual significance over the whole area from which it will be visible. Ideally, **tall buildings** it should form part of a cohesive building group that creates a high quality, distinctive landmark structure that enhances the skyline **and** This will improve the legibility of the area, and ensure **ensuring** dominant **tall and large** buildings are attractive city elements that contribute positively to the image and built environment of London.

7.23 The Mayor will work with boroughs to both identify locations where tall **and large** buildings might be appropriate, **inappropriate or sensitive**, applying the criteria set out in Policy 7.7 and to set out local strategies to ensure they are delivered in ways that maximises their benefits and minimises their negative impacts **both locally and across Borough boundaries as appropriate. It is intended that the Characterisation SPG could help set the context for this. In balancing these impacts, unacceptable harm may include criteria in part D of the policy.** Opportunity Area Planning Frameworks can provide a useful opportunity for carrying out such joint work.

Historic environment and landscapes

Policy 7.8 Heritage assets and archaeology

Strategic

A London's **heritage assets** and historic environment, including **listed buildings, registered historic parks and gardens and other natural and historic** landscapes, conservation areas, heritage assets, World Heritage Sites, **registered battlefields**, Scheduled Ancient Monuments, **archaeological remains** and memorials should be identified **and valued so that their significance they can be conserved, and where possible enhanced, where possible preserved and restored.**

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present, the site's archaeology.

Planning decisions

C Development should identify, value, preserve, conserve, refurbish **restore, re-use** and incorporate heritage assets, where appropriate.

D New Development affecting in the setting of heritage assets **and their settings**, and conservation areas should **conserve their significance, by being** sympathetic to their form,

scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, **landscapes** and significant memorials. **The physical assets should, where possible, be made available to the public on-site.** Where the artefact archaeological asset or memorial cannot be **preserved or managed** moved from the on-site **provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.** without damaging its cultural value, The assets should where possible be made available to the public on-site.

LDF preparation

F Boroughs should, in LDF policies, seek to maintain and **enhance** increase the contribution of built, **landscaped and buried** heritage to London's environmental quality, **cultural identity** and economy **as part of managing** while allowing for London's **ability** to accommodate change and regeneration.

G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, and protecting, **enhancing and improving access to the historic environment and heritage assets and their settings where appropriate** heritage assets scheduled ancient monuments, archaeological assets, memorials and natural and historic landscape character within their area.

7.24 London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. Natural landscapes can help to provide a unique sense of place³⁶ whilst layers of architectural history provide an environment that is of local, national and world heritage value^{15,16}. It is to London's benefit that some of the best examples of architecture from the past 2000 years sit side by side to provide a rich texture that makes the city a delight to live, visit, study and do business in. Ensuring the identification and sensitive management of London's historic **heritage** assets in tandem with promotion of the highest standards of modern architecture will be key to maintaining the blend of old and new that gives the capital its unique character¹⁹. Identification and recording heritage through, for example, character appraisals, and conservation plans **and local lists, which form the Greater London Historic Environmental Record (GLHER)** are essential to this process²⁰

7.24A London's diverse range of designated and non-designated heritage assets contribute to its status as a World Class City. Designated assets currently include 4 World Heritage Sites, over 1,000 conservation areas, almost 19,000 listed buildings, over 150 registered parks and gardens, more than 150 scheduled monuments and 1 battlefield (Barnet) ²¹. The distribution of designated assets differ across different parts of London, and are shown in Map 7.0). Those designated assets at risk include 72 conservation areas, 493 listed buildings ³⁷ scheduled monuments and 14 registered parks and gardens²². London's heritage assets range from the Georgian squares of Bloomsbury to Kew Gardens (Victorian) and the Royal Parks, and include ancient places of work like the Inns of Court (medieval in origin), distinctive residential areas like Hampstead Garden Suburb (early twentieth century) and vibrant town centres and shopping areas like Brixton and the West End. This diversity is a product of the way London has grown over the 2,000 years of its existence, embracing older settlements and creating new ones, often shaped by the age they were developed. This sheer variety is an important element of London's vibrant economic success, world class status and unique character.

Map 7.0 Spatial Distribution of Designated Heritage Assets
(new map)

7.25 Crucial to the preservation of this character is the careful protection and adaptive re-use of heritage buildings and their settings. **Heritage assets such as cConservation areas** make a

significant contribution to local character and should also be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form. Development **that affects the setting of near heritage listed buildings or conservation areas should meet be of the highest quality of architecture and design, public realm, and respond positively to local context and character outlined in the policies above. When considering re-use or refurbishment of heritage assets, opportunities should be explored to identify potential modifications to reduce carbon emissions and secure sustainable development. In doing this a balanced approach should be taken, weighing the extent of the mitigation of climate change involved against potential harm to the heritage asset or its setting.**

7.26 Built heritage **London's heritage assets and historic environment** also makes a significant contribution to the city's culture by providing easy access to the history of the city and its places. For example recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. In addition to buildings, people can perceive the story of the city through plaques, monuments, museums, artefacts, photography and literature. Every opportunity to bring the story of London to people and ensure the accessibility and good maintenance of London's heritage should be exploited²³. In particular, where new development uncovers an archaeological site or memorial, these should be recovered and wherever possible, made accessible **preserved or and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset.**

Policy 7.9 Heritage-led regeneration

Strategic

A Regeneration schemes should **identify and** make use of heritage assets and reinforce the qualities that make the heritage asset significant **so they can stimulate environmental, economic and community regeneration.** This includes buildings, landscape features, and views, Blue Ribbon Network and public realm.

Planning decisions

B New Development should repair, refurbish **restore** and re-use heritage assets including buildings at risk, **as appropriate.** It should be demonstrated that the proposed development would give adequate status to the heritage asset in the design of the proposal.

LDF Preparation

C Boroughs should, in LDF policies, **support the principles of heritage led regeneration.**

7.27 **Based on an understanding of the value and significance of heritage assets,** the sensitive and innovative use of historic assets within local regeneration should be encouraged. Schemes like Townscape Heritage Initiatives, **Heritage Lottery Fund,** Heritage Economic Regeneration Schemes or Buildings at Risk Grants can play an important role in fostering regeneration of historic areas while also promoting the maintenance and management of heritage assets and developing community appreciation of them.

Policy 7.10 World Heritage Sites

Strategic

A New dDevelopment in World Heritage Sites and in their settings, including any buffer zones, of a World Heritage Site should conserve, promote, sustainably use and enhance their authenticity, integrity and significance and not have a negative impact on the Site's Outstanding Universal Values. The Mayor will work with relevant stakeholders to develop supplementary planning guidance to define the setting of World Heritage Sites.

Planning decisions

B Development proposal should not cause adverse impact changes to the setting of a World Heritage Sites or their setting, including any buffer zone if the change which is likely to compromise a viewer's ability to appreciate the its Outstanding Universal Values, integrity, authenticity and significance of the Site. In considering planning applications appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plans.

LDF preparation

C LDFs should contain policies to:

a that protect, promote, interpret, and conserve, the historic significance of the World Heritage Sites and their Outstanding Universal Values, integrity and authenticity

b and safeguard, and, where appropriate, enhance both them and their settings

C where available, World Heritage Site Management Plans should be used to inform the plan-making process.

7.28 The World Heritage Sites at Maritime Greenwich Maritime, Royal Botanic Gardens Kew Gardens, Palace of Westminster and Westminster Abbey including St Margaret's Church and Tower of London are embedded in the constantly evolving urban fabric of London. The surrounding built environment must be carefully managed to find a balance between protecting the elements of the World Heritage Sites that make them of Outstanding Universal Value and allowing the surrounding land to continue to change and evolve as it has for centuries. To help this process, the Mayor will encourage the development and implementation of World Heritage Management Plans.

7.28A Darwin's Landscape Laboratory is currently included on the Tentative List. Development affecting Tentative List Sites should also be evaluated so that their Outstanding Universal Value is not compromised.

7.29 Development in the setting, or buffer zone where appropriate, of these World Heritage Sites, should provide opportunities to enhance their setting through the highest quality of architecture and contributions to the improvement of the public realm that are consistent with the principles of the World Heritage Site Management Plans. However, it is vital that development in the setting of World Heritage Sites contributes to the provision of an overall amenity and ambience appropriate to their World Heritage status²⁴.

Policy 7.11 London View Management Framework

Strategic

A The Mayor has designated a list of strategic views (Table 7.1) that he will keep under review. These views are seen from places that are publicly accessible and well used. They include significant buildings or urban landscapes that help to define London at a strategic level. These

views represent at least one of the following categories: panoramas across substantial parts of London; views from an urban space of a building or group of buildings within a townscape setting (including narrow, linear views to a defined object); or broad prospects along the river Thames. Development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view.

B Within the designated views the Mayor will identify landmarks that make aesthetic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.

C The Mayor will also identify Strategically Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically Important Landmarks by designating Landmark Viewing Corridors and Wider Setting Consultation Areas. These elements together form a Protected Vista. Each element of the Vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the **Strategically Important** Landmark.

D The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's **authenticity, integrity, significance and** outstanding universal value.

E The Mayor has prepared supplementary planning guidance on the management of the designated views. This supplementary guidance includes plans for the management of views as seen from specific assessment points within the Viewing Places. The guidance provides advice on the management of the foreground, middle ground and background of each view. The Mayor will, when necessary, review this guidance.

7.30 A number of views make a significant contribution to the image and character of London at the strategic level. This could be because of their composition, their contribution to legibility, or because they provide an opportunity to see key landmarks as part of a broader townscape, panorama or river prospect. The Mayor will seek to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development will often make a positive contribution to the views and can be encouraged. However, in others, development is likely to compromise the setting or visibility of a key landmark and should be resisted.

7.31 There are three types of strategic views designated in the London Plan – London Panoramas, River Prospects and Townscape Views (including Linear Views). Each view can be considered in three parts. The Front and Middle Ground Assessment Areas are the areas between the viewing place and a landmark, or the natural features that form its setting. The Background Assessment Area to a view extends away from the foreground or middle ground into the distance. Part of the background may include built or landscape elements that provide a backdrop to a strategically important landmark.

7.32 The Mayor identifies three strategically important landmarks in the designated views: St Paul's Cathedral, the Palace of Westminster and the Tower of London. Within some views, a Protected Vista to a strategically important landmark will be defined and used to protect the viewer's ability to recognise and appreciate the **Strategically Important** Landmark. The Protected Vista will be composed of two parts:

- **A Landmark Viewing Corridor** –the area between the viewing place and a strategically

important landmark that must be maintained if the landmark is to remain visible from the viewing place.

• **Wider Setting Consultation Area** - is the area enclosing the Landmark Viewing Corridor in both the foreground and middle ground, and background of the Protected Vista. Development above a threshold height

in this area could compromise the viewer's ability to recognise and appreciate the strategically important landmark.

7.33 The Mayor has prepared supplementary guidance on the management of views designated in this Plan. The SPG identifies Viewing Places within which Viewing Locations can be identified. It also specifies individual Assessment Points from which management guidance and assessment should be derived. Some views are experienced as a person moves through a Viewing Place and assessment of development proposals should consider this. This guidance will be reviewed when necessary to ensure it is compliant with Policies 7.11 and 7.12.

7.34 The SPG will provide guidance on the treatment of all parts of the view, and where appropriate the components of the Protected Vista, for each view.

Policy 7.12 Implementing the London View Management Framework Strategic

A 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, where possible, preserve or where possible **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.

Planning decisions

B Development in the foreground and middle ground of a designated view should not, be overly intrusive, unsightly or prominent to the detriment of the view, block a view or create an intrusive element in the view.

C Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a townscape or river prospect, and well preserved within its setting **with clear sky behind it**, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a landmark should take into account the effects of distance and atmospheric or seasonal changes.

D In addition to the above, new development in designated views should comply with the following:

a London Panoramas – should be managed so that development fits within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. The management of views containing Strategically Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the **Strategically Important** Landmark in the foreground, or background where appropriate.

b River Prospects – views should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context.

c Townscape and Linear Views – should be managed so that the ability to see specific buildings, or

groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.

E Viewing places should be accessible and managed so that they enhance people's experience of the view.

F In addition to the above, where there is a Protected Vista:

a development that exceeds the threshold height of a Landmark Viewing Corridor should be refused

b development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or **enhance** the viewer's ability to recognise and to appreciate the Strategically Important Landmark. It should not cause a canyon effect around the Protected Vista
Landmark Viewing Corridor

c development in the foreground of the Wider Setting Consultation Area should not detract from the prominence of the Strategically Important Landmark in this part of the view.

G In complying with the above new development should not cause negative or undesirable local urban design outcomes.

H The Mayor will identify, in some designated views, situations where the silhouette of a World Heritage Site, or part of a World Heritage Site, should be protected.

LDF preparation

J Boroughs should reflect the principles of this policy **and include all designated views**, including the Protected Vistas, into their Local Development Frameworks. **Boroughs may also wish to use the principles of this policy for the designation and management of local views.**

Table 7.1 Designated views (amended table)

London Panoramas

- 1 Alexandra Palace to Central London
- 2 Parliament Hill to Central London
- 3 Kenwood to Central London
- 4 Primrose Hill to Central London
- 5 Greenwich Park to Central London
- 6 Blackheath Point to Central London

Linear Views

- 7 The Mall to Buckingham Palace
- 8 Westminster Pier to St Paul's Cathedral
- 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral

River Prospects

- 10 Tower Bridge
- 11 London Bridge
- 12 Southwark Bridge
- 13 Millennium Bridge and Thameside at Tate Modern

- 14 Blackfriars Bridge
- 15 Waterloo Bridge

16 The South Bank

17 Golden Jubilee/Hungerford Footbridges

18 Westminster Bridge

19 Lambeth Bridge

20 Victoria Embankment between Waterloo and Westminster Bridges

21 Jubilee Gardens and Thameside in front of County Hall

22 Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas' Hospital

Townscape Views

23 Bridge over the Serpentine, Hyde Park to Westminster

24 Island Gardens, Isle of Dogs to Royal Naval College

25 The Queen's Walk to Tower of London

26 St James' Park to Horse Guards Road

27 Parliament Square to Palace of Westminster

Map 7.10 View management framework (new map)

7.35 Protected Vistas are designed to preserve the viewer's ability to recognise and appreciate a Strategically Important Landmark from a designated viewing place. Development that exceeds the threshold plane of the landmark viewing corridor will have a negative impact on the viewer's ability to see the **Strategically Important** landmark and is therefore contrary to the London Plan. Development in the foreground, middle ground or background of a view can exceed the threshold plane of a landmark lateral assessment area or landmark background assessment area **Wider Setting Consultation Area** if it does not damage the viewer's ability to recognise and to appreciate the strategically important landmark and if it does not dominate the **Strategically Important** landmark in the foreground or middle ground of the view.

7.36 In complying with the requirements of Policies 7.11 and 7.12 a development should comply with other policies in this chapter and should not have a negative effect on the surrounding land by way of architecture or relationship with the public realm.

Map 7.02 Protected vistas (new map)

7.37 The Protected Vistas will be developed in consultation with the Secretary of State. The Mayor will seek the Secretary of State's support **agreement** to adopt Protected Vista directions that are consistent with the Protected Vistas in the London Plan **in conformity with the London Plan policies and the London View Management Framework SPG**

Emerging Local Development Framework policies

City of London

The **Core Strategy submission version** was submitted to the Secretary of State in December 2010 and will be Examined in Public by an Independent Planning Inspector on 29th March 2011. The following policies are extracted from the Submission Version

Policy CS12: Historic Environment

To preserve and enhance those buildings and areas which make an important contribution to the City's historic and archaeological heritage and provide an attractive environment for the City's communities and visitors, by:

1. Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.
2. Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.
3. Protecting and promoting the evaluation and assessment of the City's ancient monuments and archaeological remains and their settings, including the interpretation and publication of results of archaeological investigations.
4. Safeguarding the character and setting of the City's gardens of special historic interest.
5. Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value, architectural and historic significance of the Tower of London World Heritage Site and its setting.

Policy CS13: Protected Views

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 to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
2. Protecting and enhancing: local views of St. Paul's Cathedral, through the City's "St. Paul's Heights" code; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views of historic City landmarks and skyline features.
3. Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, which adjoins the City, taking account of the Tower of London World Heritage Site Management Plan (2007).

Policy CS14: Tall Buildings

To allow tall buildings of world class, 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 of the highest architectural excellence on suitable sites within the City's Eastern Cluster.
 2. Refusing planning permission for tall buildings within conservation areas, and where they would adversely affect protected views of St Paul's Cathedral, the Monument and the Tower of London as defined on the Proposals Map.
 3. Elsewhere in the City, 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 settings of listed buildings and conservation areas, and the effect on historic skyline features.
 4. Ensuring that tall building proposals do not adversely affect the operation of London's airports.
- London Borough of Southwark
The Core Strategy is anticipated to be adopted in January 2011.

Strategic Objective

2F. Conserve and protect historic and natural places

Southwark's historic buildings will be protected and improved particularly in conservation areas. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are STP 1, STP 2 SP 1, SP 11, SP 12 and SP 14.

Strategic Policy 12 – Design and conservation

How we will achieve our vision to improve our places:

*SO 1E: Be Safe SO 2B: Promote sustainable use of resources SO 2C: Provide more and better homes
SO 2F: Conserve and protect historic and natural places*

Our approach is:

Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.

We will do this by:

- Expecting development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens, world heritage sites and scheduled monuments.
- Carefully managing the design of development in the Thames Policy Area so that it is sensitive to the many special qualities of the River.
- Making sure that the height and design of development protects conserves and enhances strategic views and is appropriate to its context, the historic environment and important local views.
- Requiring tall buildings to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. Locations where tall buildings could go are in London Bridge, the northern end of Blackfriars Road, Elephant and Castle and action area cores. These are shown on the Key diagram.

- Continuing to use the Southwark Design Review Panel to assess the design quality of development proposals.
- Requiring Design and Access Statements with applications and encouraging Building for Life Assessments and heritage impact assessments.

We are doing this because

Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 40 conservation areas covering 686ha (23% of the borough) and around 2,500 listed buildings and monuments. The Tower of London, a World Heritage Site, is located across the River from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 9 Archaeological Priority Zones (APZs) covering 679ha (23% of the borough).

Protecting and enhancing the character and historic value of places are important issues identified in the sustainability appraisal. Well designed buildings and spaces will help improve people's quality of life and make places more attractive. This can also help attract businesses to the area. It is important that the design of a development is carefully thought through and takes into account how the development is part of a wider place and how a place's uniqueness and historic value can be used to stimulate regeneration and improvements. This is in line with London Plan policies 4B.8, 4B.11 and 4B.13.

Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites

308 Permission will not be granted for developments that would not preserve or enhance:

- i. The immediate or wider setting of a listed building; or
- ii. An important view(s) of a listed building; or
- iii. The setting of the Conservation Area; or
- iv. Views into or out of a Conservation Area; or
- v. The setting of a World Heritage Site; or
- vi. Important views of /or from a World Heritage Site.

Reasons

309 The council recognises the importance of Southwark's built heritage as a community asset and will seek the adequate safeguarding of this asset. Southwark has around 2500 listed buildings. These historic features define the local environment, providing a sense of place and enriching the townscape.

PPG 1 states that control of external appearances is important in Conservation Areas and areas where the quality of the environment is particularly high.

PPG15 requires Local Authorities to include policies for the protection and enhancement of the historic environment.

Outline planning applications are not usually suitable for development affecting the setting of

listed buildings, conservation areas and world heritage sites. The council will use its powers under Article 3 (2) to require the submission of reserved matters needed to make a decision on the effect of the development on settings and views.

London Borough of Tower Hamlets

The London Borough of Tower Hamlets Core Strategy was adopted in September 2010 and contains the following policies.

Strategic Objectives:

SO22

Protect, celebrate and improve access to our historical and heritage assets by placing these at the heart of reinventing the hamlets to enhance local distinctiveness, character and townscape views.

SO23

Promote a borough of well designed, high quality, sustainable and robust buildings that enrich the local environment and contribute to quality of life.

Strategic Policy: SP10

1. Protect, manage and enhance the Tower of London World Heritage Site, its setting, and surrounding area, as well as the buffer zone and setting of the Maritime Greenwich World Heritage Site through:

- a) The respective World Heritage Site Management Plans and associated documents.

2. Protect and enhance the following heritage assets and their settings:

- World Heritage Sites
- Statutory Listed Buildings
- Conservation Areas
- London Squares
- Historic Parks and Gardens
- Scheduled Ancient Monuments
- Archaeological Remains
- Archaeological Priority Areas
- Locally Listed Buildings
- Local Landmarks
- Other buildings and areas that are identified through the
- Conservation Area Character Appraisals and Management Guidelines

3. Preserve or enhance the wider built heritage and historic environment of the borough, enabling the creation of locally distinctive neighbourhoods, through:

- a) Promoting and implementing placemaking across the borough to ensure that the locally distinctive character and context of each place is acknowledged and enhanced.

- b) Protecting, conserving, and promoting the beneficial reuse of, old buildings that provide suitable locations for employment uses, including small and medium enterprises.
- c) Encouraging and supporting development that preserves and enhances the heritage value of the immediate and surrounding environment and the wider setting.
- d) Working to reduce Heritage at Risk.

4. Ensure that buildings and neighbourhoods promote good design principles to create buildings, spaces and places that are high-quality, sustainable, accessible, attractive, durable and well-integrated with their surrounds. This will be achieved through ensuring development:

- a) Protects amenity, and promotes well-being (including preventing loss of privacy and access to daylight and sunlight);
- b) Uses design and construction techniques to reduce the impact of noise and air pollution;
- c) Respects strategic and local views and their role in creating local identity and assisting in wayfinding;
- d) Respects its local context and townscape, including the character, bulk and scale of the surrounding area;
- e) Contributes to the enhancement or creation of local distinctiveness;
- f) Is flexible and adaptable to change;
- g) Uses high quality architecture, urban and landscape design;
- h) Assists in creating a well-connected public realm that is easy and safe to navigate.

5. The following locations are where tall buildings will be acceptable:

- Canary Wharf
 - Aldgate
- a) The above locations are identified as they meet the following criteria:
 - i) Be part of an existing economic cluster and respond to existing built character of the area.
 - ii) Have a large floor-plate office building typology.
 - iii) Be in areas of high accessibility.
 - b) Appropriate sites for tall buildings will be identified within the Sites and Placemaking DPD. All tall buildings including those outside of the above locations will be assessed against criteria set out in the Development Management DPD.

Draft Statement of Outstanding Universal Value

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:

Its landmark siting, for both protection and control of the City of London: 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.

As a symbol of Norman power: The Tower of London was built as a demonstration 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.

As 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.

As 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.

For its association 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's 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 is enacted is one of the key elements which have 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 imprisonment in the Tower of Edward V and his younger brother in the 15th century, and then, in the 16th century, four English queens, three of them executed on Tower Green – Anne Boleyn, Catherine Howard and Jane Grey – with only Elizabeth I, then Princess Elizabeth, 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); *Have exerted great influence over a span of time or within a cultural area of the world, on developments in architecture, monumental arts or town planning and landscaping*

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 or building or architectural ensemble which illustrates a significant stage in 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.

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 Property's visual

integrity.

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; and 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 remaining 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 in their original relationship the physical elements that provided the stage for key events in European history – the scaffold site, the Prisoners', or Water Gate, the dungeons - 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 how the monument was used and functioned 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 does not respect its context and setting.

Protection and Management Requirements 2011

The UK Government protects World Heritage Sites 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.

National planning policy guidance on protecting the historic environment (Planning Policy Statement 5) and World Heritage (Circular 07/09) and accompanying explanatory guidance have been recently published by Government. Policies to protect, promote, conserve and enhance World Heritage Sites, their settings and buffer zones, can be found in regional plans and in local authority plans and frameworks.

Regional policy on World Heritage Sites in London is set down in the London Plan (Consolidated with Alterations since 2004), which is under a regular cycle of review. The London View Management Framework (July 2010) provides Supplementary Planning Guidance to the London Plan, including 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 adopted Unitary Development Plan containing specific policies relating to the Tower of London. These adopted plans are now being replaced by the authorities' Local Development Frameworks (the Core Strategies of which are either adopted or approaching adoption), which provide a comprehensive framework of policies concerning the Tower of London.

All UK World Heritage Sites are required to have Management Plans which set out the Outstanding Universal Value (OUV) and the measures in place to ensure it is conserved, protected, promoted and enhanced. Relevant policies in Management Plans carry weight in the UK planning system.

The Tower of London World Heritage Site Management Plan was adopted in 2007. 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 OUV and setting. At a strategic level, these challenges are recognised in the London Plan and the Boroughs' emerging Local Development Frameworks. These documents set out a framework of policies aimed at conserving, protecting and enhancing the OUV 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 study of the local setting), although pressures remain significant. Wider views are identified in and protected by the London View Management Framework.

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 objective. These include long-term conservation plans, prioritised and funded according to conservation need, and cyclical maintenance plans. Plans for the visitor experience respond to 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.

The English Planning System and Dynamic Visual Impact Studies for development affecting World Heritage Sites

In July 2009 the UK Government published Circular 07/09 on the Protection of World Heritage Sites. It sets out the Government's objectives for the protection of World Heritage Sites, the principles that underpin the objectives and the actions necessary to achieve them. The Circular has material weight in planning decisions and must be considered by Planning Authorities¹ when preparing their planning documents and policies and when determining applications.

A key objective of the Circular is that "policy frameworks at all levels recognise the need to protect the Outstanding Universal Value of World Heritage Sites [with] the main objective being the protection of each World Heritage Site through conservation and preservation of its Outstanding Universal Value" and to help Planning Authorities and the development industry comply with the Circular². The method comprises a two-stage process:

Stage 1

In order to protect World Heritage Sites and their settings, Planning Authorities, in consultation with key stakeholders, should produce baseline assessments that identify the aspects of a view that contribute to the ability of the public to recognise and appreciate a World Heritage Site's Outstanding Universal Value. The baseline assessment will use a consistent methodology based, in part, on the English Heritage documents *Conservation Principles* and *Seeing the History in the View*.

It is anticipated that following public consultation planning authorities will adopt these baseline assessments into Supplementary Planning Documents for the area for which they are responsible.

Stage 2

Developers will be required to demonstrate that their proposals comply with Circular 07/09 by studying the potential visual impact of a development proposal on the Outstanding Universal Value of a World Heritage Site using Accurate Visual Representations and other relevant material, including the baseline assessment described in Stage 1. This visual impact study will measure the effects of the proposal's scale, grain, massing, texture, colour, scale and reflectivity on the composition of the view. The study is dynamic as it also considers distance, viewer movement, seasonal changes, day and night time changes, changes over time and cumulative impact.

It is envisaged that the *Dynamic Visual Impact Study* should form part of the planning application (or incorporated into other application documents such as an Environmental Impact Assessment) for proposals that might impact on views into, within or out of a World Heritage Site identified as important by a Planning Authority.

Views can be identified in pre-application discussions, statutory Planning Documents or in a World Heritage Site Management Plan.

¹ Planning Authorities include Regional, Local Planning Authorities, AONB boards, National Park Authorities who are responsible for preparing statutory Planning Documents

² The method has already been used to assess views of the Westminster WHS and Tower of London WHS and is set out in the Revised London View Management Framework issued July 2010.

Process:

Baseline Survey of views with ascribed values produced and consulted upon by Regional/Local Planning Authority and Policies included in Regional Spatial Strategies, LDFs, AONB and National Park Plans and SPDs, World Heritage Site Management Plans as required

