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# World Heritage Patrimoine mondial

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CONVENTION CONCERNING THE PROTECTION OF THE WORLD  
CULTURAL AND NATURAL HERITAGE

CONVENTION CONCERNANT LA PROTECTION DU PATRIMOINE  
MONDIAL, CULTUREL ET NATUREL

WORLD HERITAGE COMMITTEE / COMITE DU PATRIMOINE MONDIAL

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**Item 7 of the Provisional Agenda: State of conservation of properties inscribed on the World Heritage List and/or on the List of World Heritage in Danger**

**Point 7 de l'Ordre du jour provisoire: Etat de conservation de biens inscrits sur la Liste du patrimoine mondial et/ou sur la Liste du patrimoine mondial en péril**

MISSION REPORT / RAPPORT DE MISSION

Palace of Westminster and Westminster Abbey including Saint Margaret's Church (United Kingdom of Great Britain and Northern Ireland) (C 426bis)  
Palais de Westminster, l'abbaye de Westminster et l'église Sainte-Marguerite (Royaume-Uni de Grande Bretagne et d'Irlande du Nord) (C 426bis)

21-23 February 2017

## Mission Report

### Joint ICOMOS/ICCROM Reactive Monitoring Mission to the World Heritage property “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church” (United Kingdom of Great Britain and Northern Ireland) (C 426bis)

21-23 February 2017





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## **ACKNOWLEDGMENTS**

The mission would first like to express our condolences and concern for the attacks that were carried out on Westminster Bridge and the Palace of Westminster, on 22 March, one month after the conclusion of the Reactive Monitoring Mission. Our sincere sympathies go out to the victims and their families, to the people of Greater London, to the Government of the United Kingdom.

The mission gratefully acknowledges the kind welcome of all the authorities of the State Party at the national, Greater London, and Borough levels. We would like to thank all the staff of the Westminster City Council, Lambeth Council, Southwark Council, Wandsworth Council, the Palace of Westminster, Westminster Abbey, the Department of Culture, Media, and Sport, Historic England, the Greater London Authority, ICOMOS UK, and the Holocaust Memorial Foundation.

Special thanks are given to Tracey Crouch MP, Under Secretary of State for Sport, Tourism and Heritage and to the Mayor of London, the Rt Hon Sadiq Khan. Both took time out of their busy schedules to meet with the mission team and this was very much appreciated.



## **EXECUTIVE SUMMARY AND LIST OF RECOMMENDATIONS**

The World Heritage property “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church” was inscribed in 1987 as a cultural site under criteria (i), (ii) and (iv) at the 11th session of the World Heritage Committee held at UNESCO headquarters. In 2008, a minor boundary modification was approved at the 32nd session of the World Heritage Committee (Quebec, 2008), which combined the two existing parts of the property into a clearly unified ensemble.

The property has been the subject of eight State of Conservation reports since 2007. In 2015 at its 39th session (Bonn, 2015), the Committee noted that there still appeared to be an inadequate urban planning framework to manage development in the setting of the property, with the result that development that had been approved, contrary to the advice of English Heritage (now Historic England), was beginning to have a cumulative negative impact. It also requested information on conservation works being planned for the Palace of Westminster, and the progress on the development of a new management plan. The Committee further requested the State Party to invite a joint ICOMOS/ICCROM Reactive Monitoring mission to evaluate the extent of impacts on the Outstanding Universal Value of the property resulting from the implementation of the ongoing projects and other current planning applications, and to identify potential courses of action to address ways of strengthening the protection of the property, including through improved planning frameworks and management structures. The mission was carried out from 21 – 23 February 2017. ICOMOS was represented by Tamás Fejérdy, and ICCROM by Joseph King.

### **General Findings**

The World Heritage property of Palace of Westminster and Westminster Abbey including Saint Margaret’s Church is one of the most important and recognizable monuments in London, and is a World Heritage Property with Outstanding Universal Value (OUV). After examining the situation on the ground, and carrying out discussions with stakeholders from all levels of government, the Mission finds that the World Heritage property is vulnerable to incremental changes, in particular to its setting, and is currently facing threats from the effects of development projects. These threats come mainly from the potential to diminish the important visual qualities of the property, including views both to and from the site. In the case of Elizabeth House, the Shell Centre, and the Nine Elms project, the World Heritage Committee has already expressed concern as to the negative impacts on the OUV of the property. As these projects are in construction, the Mission can confirm the concerns of the Committee.

There is also, however, concern about the decision-making process for future development requests. The fact that these projects received statutory consent and were allowed to be built shows that despite the numerous policies that are in place at the national, city-wide, and borough levels, there is a disconnect between the good intentions of the policies and the buildings that are being constructed which negatively impact on the OUV of the property.

At a more general level, there is a need for the State Party to ensure that mechanisms are in place to reinforce the protection of OUV in the planning and decision-making process. The Mission, therefore, recommends that planning policies be reconsidered to provide a clearer, more concrete guidance for developers and decision-makers, and that the notion of balance between protection of OUV and the other benefits of the development projects be much more weighted towards the requirement to protect OUV, in keeping with the letter and spirit of the World Heritage Convention. New tools such as the 3D modelling and analysis tools discussed during the mission are considered positive and should allow for judgements not just of individual projects, but also cumulative effects of many planned or proposed projects.

The Mission also considers that the State Party should reconsider the role of Historic England and the advice that it provides when making decisions on development projects. Historic England has a long knowledge and working relationship with the implementation of the World Heritage Convention, and as the national heritage advisor, is best placed to be able to provide balanced and useful advice in regard to decisions that have a potential to affect OUV. The Mission also suggests that the State Party should consider calling in all planning applications that may have impact on the OUV of the property, especially in the event that Historic England has advised on such a possible impact.

In regard to site management, the Mission Team recommends that the new Management Plan be completed as soon as possible, and that the Steering Committee with an active participation of the Greater London Area be strengthened to ensure more effective implementation. Care should also be taken to ensure that any planned developments within the site or its immediate surroundings, including road closures, new buildings or infrastructure, new visitor facilities, and the proposed Holocaust Memorial, should be carefully evaluated to ensure that they do not negatively affect the OUV of the property.

The State of Conservation of the buildings themselves appears to be in the hands of very qualified conservation professionals. Nevertheless, given the large scale of the proposed Restoration and Renewal project for the Palace of Westminster, the State Party should keep the World Heritage Committee informed as the plans develop, in accordance with the *Operational Guidelines* to the World Heritage Convention. This was unfortunately not done before construction began on the access tower for the new Triforium museum at Westminster Abbey. The mission, therefore, recommends that the State Party make additional efforts to keep the World Heritage Committee informed of any planned significant changes to the property.

The State Party should consider establishing links between the site management teams of each of the four London World Heritage properties. Such a link would enhance the possibility for communication and finding innovative solutions to common problems. This is also true for the World Heritage properties in the United Kingdom as a whole. A stronger network of World Heritage properties would provide benefits for all.

The Mission team notes that if the concerns expressed in chapter 3 of this document are not addressed effectively, and if the process for consent for development projects is not modified to take a stronger consideration of the Outstanding Universal Value of the property, it will likely lead to a continued deterioration of the setting of the property, and may lead to the need to consider placing the property on the World Heritage List in Danger.

## **Recommendations**

The Reactive Monitoring Mission carried out by representatives of ICOMOS and ICCROM, from 20 – 23 February 2017, came to the following more specific recommendations after review of the documents provided as well as on-site visits and meetings with stakeholders.

### *Recommendations on Issues at a General Level*

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

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

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

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

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

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

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

#### *Recommendations on Site Management*

Recommendation 8: The new management plan for the World Heritage property, which is in preparation, should be finalized as soon as possible by the Westminster City Council, in cooperation with the other members of the Steering Group. This management plan should consider management and decision-making issues within the World Heritage property and its setting. It should also include disaster risk management at the property and in each of the buildings of the property. The plan should contain clear actions for its implementation taking into account all members of the Steering Group and should assign responsibilities as well as indicators for implementation to allow for an evaluation of its implementation over time.

Recommendation 9: The Steering Group should be revitalized, with regular meetings and a more action oriented perspective in regard to overseeing the implementation of the Management Plan. The Greater London Authority should also take a more active role in the Steering Group (perhaps becoming a co-chair) to bridge differences amongst the boroughs.

*Recommendations on Urban Planning and Development Projects with an Emphasis on Tall Buildings*

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

Recommendation 11: The Mission Team does not recommend listing the property on the World Heritage List In Danger at this time, despite the negative impacts that developments such as Elizabeth House, Shell Centre, and Nine Elms, all three in construction, have on the OUV of the property. Nevertheless, the cumulative effect of these developments with other planned developments could lead the Committee in the future to consider In Danger listing.

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

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

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

Recommendation 15: The advice of the national heritage advisor, Historic England, should be given a much greater weight by all of the boroughs and other levels of decision-making when evaluating projects and their potential impact on OUV. It is unlikely that if Historic England has an objection to a particular project, that the World Heritage Committee and its Advisory Bodies would have a lesser concern. An objection by Historic England should already be a warning sign to the whole chain of decision-making that there will likely be issues at the World Heritage level.

*Recommendations on Urban Planning Issues Westminster*

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

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

Recommendation 18: The State Party may wish to reconsider the establishment of a buffer zone around the World Heritage property. While not able to deal with issues related to the larger setting, a buffer zone could be a useful tool to inform future development and design of any new elements in the vicinity of the World Heritage property.

*Recommendations on the Restoration of Buildings within the World Heritage Property*

Recommendation 19: As more detailed plans are developed for the Restoration and Renewal project for Westminster Palace, the State Party should keep the World Heritage Centre and Advisory Bodies informed as soon as possible, particularly in regard to demolitions or new constructions, but also to any other significant works that may impact on the OUV of the property. This early notice will avoid any misunderstandings as the work progresses.

Recommendation 20: The Restoration and Renewal project offers the Westminster team an opportunity to reconsider the temporary structures for entertaining along the riverside façade of the palace. Any eventual hospitality structures on that important view should take into account the visual impacts from the Lambeth side of the river and should in no way have a negative impact on OUV.

Recommendation 21: The mission team regrets that the work on the Triforium project was carried out without an HIA and without informing the World Heritage Centre prior to commencement of the project. While it does not appear that this addition will have a negative impact on the OUV of the property, it is recommended that any future work be subject to HIA and information being provided. In the meantime, the mission recommends that full information on the existing project be sent to the World Heritage Centre as well as a final report of the works once they have been completed to ensure that there has been no negative impact on the OUV.

*Recommendations on Linking the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property to its Larger Context in London and the United Kingdom*

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

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





## **1 BACKGROUND TO THE MISSION**

### **1.1 Inscription History**

The World Heritage property “Palace of Westminster, Abbey of Westminster and Saint Margaret’s Church” (hereafter the ‘Westminster World Heritage property’ or ‘the property’) was inscribed in 1987 as a cultural site under criteria (i), (ii) and (iv) at the 11th session of the World Heritage Committee held at UNESCO headquarters (see Decision CONF 005 VII.A in <http://whc.unesco.org/en/decisions/3750>).

The original request for nomination had been only for Westminster Palace, but the Advisory Body evaluation prepared by ICOMOS one year prior to the inscription, regretted the very restricted delimitation proposed for the boundaries of the proposed nomination, which excluded nearby complementary ensembles of St. Margaret’s and Westminster Abbey (see Advisory Body Evaluation, ICOMOS Report of December 23, 1986 in <http://whc.unesco.org/en/list/426/documents/>). An enlarged property composed of Westminster Palace, Westminster Abbey, and Saint Margaret’s Church was then inscribed in 1987 as a serial property with two components.

In 2008, a minor boundary modification was approved at the 32nd session of the World Heritage Committee (Quebec, 2008), which combined the two existing parts of the property into a clearly unified ensemble. The Committee, however, recommended a buffer zone be established with a view to protecting the visual integrity of the inscribed property in its environment, on completion of the impact studies and the coordination projects for building developments south of the Thames in London, in keeping with the expression of the Outstanding Universal Value of the Westminster site.

A Statement of Significance was adopted for the property at the 32nd session of the World Heritage Committee (Quebec, 2008, see Decision 32 COM 8B.96) in <http://whc.unesco.org/en/decisions/1542>). In 2013, the Committee approved a Retrospective Statement of Outstanding Universal Value (OUV) for the property at its 37th session (see Decision 37 COM 8E in <http://whc.unesco.org/en/decisions/4964>). At the same time, the name of the property was changed to “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church” (see Decision 37 COM 8B.7 in <http://whc.unesco.org/archive/2013/whc13-37com-20-en.pdf>).

### **1.2 Inscription criteria**

Westminster Palace, Westminster Abbey and St Margaret’s Church were inscribed in 1987 during the 11th session of the World Heritage Committee, based on Cultural criteria (i), (ii) and (iv).

Criterion (i): Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.

Criterion (ii): Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin at Westminster Palace, in the “Gothic Revival” of the XIX century.

Criterion (iv): The Abbey, the Palace and St. Margaret’s illustrate in a concrete way the specificities of parliamentary monarchy over as long a period of time as nine centuries. Whether one looks at the royal tombs of the chapter house, the remarkable vastness of

Westminster Hall, of the House of Lords or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

### **1.3 Statement of Outstanding Universal Value**

The Statement of Outstanding Universal Value for the Westminster was adopted by the World Heritage Committee in 2013 and provides the current baseline for the site's management (Decision: 37 COM 8E). The full Statement of OUV can be found in Annex I.

### **1.4 Examination of the State of Conservation by the World Heritage Committee**

The State of Conservation of the property has been on the World Heritage Committee's agenda since 2007, at its 31<sup>st</sup> (Christchurch, 2007), 32<sup>nd</sup> (Quebec 2008), 33<sup>rd</sup> (Sevilla, 2009), 35<sup>th</sup> (Paris, 2011), 36<sup>th</sup> (Saint-Petersburg, 2012), 37<sup>th</sup> (Phnom Penh, 2013), 38<sup>th</sup> (Doha, 2014) and 39<sup>th</sup> (Bonn, 2015) sessions respectively. Throughout this period, the Committee has expressed concern over a lack of a buffer zone, weakness in the management system, and most importantly, the existence of development projects (and tall buildings in particular) which may impact on the setting and views of the property.

The Committee requested Reactive monitoring missions at its 29<sup>th</sup> (Durban, 2005) and 35<sup>th</sup> (Paris, 2011) sessions, which were carried out in 2006 and 2011 (reports available at <http://whc.unesco.org/en/list/426/documents>). These missions focused on the need to protect the immediate and wider setting of the property. At its 37<sup>th</sup> session (Phnom Penh, 2013), the Committee requested the State Party to strengthen its policy and planning frameworks to ensure the adequate protection of the setting of the property by defining the immediate and wider setting and view cones of the property in relation to its OUV. It also requested the State Party to identify adequate mechanisms within the respective policies of all relevant planning authorities to ensure that new constructions do not impact on views and other attributes of the property (see Decision 37 COM 7B.90 in <http://whc.unesco.org/en/soc/1971>).

Committee decisions in full can be found in ANNEX VI.

### **1.5 Justification of the mission**

In 2015 at its 39<sup>th</sup> session (Bonn, 2015), the Committee noted that there still appeared to be an inadequate urban planning framework to manage development in the setting of the property, with the result that development that had been approved contrary to the advice of English Heritage (now Historic England), was beginning to have a cumulative negative impact. (see 39 COM 7B.87 in <http://whc.unesco.org/en/soc/3303/>). At the same time, the Committee deeply regretted that the State Party had not complied with previous requests to ensure that development projects affecting the property be revised before the start of construction work.

The Committee noted with serious concern that no reconsideration had been made on the Elizabeth House development scheme regarding design and size. It requested the State Party to keep the World Heritage Centre informed on this project. The Committee further noted the lack of an urban planning framework, and requested that information on any larger-scale projects be submitted to the World Heritage Centre before decisions were taken. Additionally, the Committee requested the submission of information on conservation works for the Palace of Westminster based on the results of Heritage Impact Assessments. Regarding the Management Plan, the Committee requested the State Party to finalize the review of the Management Plan for the property as soon as possible.

At the same session the Committee requested the State Party to invite a joint ICOMOS/ICCROM Reactive Monitoring mission to evaluate the extent of impacts on the Outstanding Universal Value of the property resulting from the implementation of the ongoing projects and other current planning applications, and to identify potential courses of action to address ways of strengthening the protection of the property, including through improved planning frameworks and management structures;

#### **1.6 Terms of reference and composition of mission team**

The Terms of Reference of the Mission along with its programme can be found in ANNEX III.



## **2 POLICY FOR THE PRESERVATION AND MANAGEMENT OF THE WORLD HERITAGE PROPERTY**

Planning and protection legislation and policy in the United Kingdom takes places at both national and local levels.

### **2.1 National Legislative Framework**

The United Kingdom Government protects World Heritage properties in England in two ways. Firstly individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990, and the 1979 Ancient Monuments and Archaeological Areas Act and secondly through the United Kingdom Spatial Planning system under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990. The individual sites within the property are protected as Listed Buildings and Scheduled Ancient Monuments.

Government guidance on protecting the Historic Environment and World Heritage is set out in the National Planning Policy Framework and the Government's Planning Practice Guidance on Conserving and Enhancing the Historic Environment (<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>). Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents, which are reviewed and publicly consulted upon on a regular cycle.

### **2.2 National Planning Policy Framework of 2012 (NPPF)**

The NPPF is a single set of policies, which replaced 44 individual policy documents in 2012. It provides the pillars for heritage conservation and heritage-led development. It includes a variety of other issues to be taken into account by local decision-makers, such as policies referring to EU directives regarding agriculture or renewable energies, and the provision of high quality homes and affordable housing. For more information see:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

The NPPF makes deliberate reference to World Heritage in its paragraphs 132, 137, 138 and 144. World Heritage properties, here called World Heritage Sites, are considered as "designated heritage assets" at the same level as the highest, nationally protected monuments or heritage areas for which specific legal protection mechanisms apply respectively (see above). It has to be noted, however, that there is no additional national legislation that would cover the actual protection of a wider area as a World Heritage property, unless its boundaries coincide exactly with those of scheduled monuments, listed buildings, registered parks and gardens, or conservation areas.

### **2.3 The London Plan 2016 - The Spatial Development Strategy for Greater London (Consolidated with Alterations after 2011)**

In the United Kingdom, London is unique in that planning for Greater London is shared between the Mayor of London, 32 London Boroughs and the City of London Corporation. Under the legislation establishing the Greater London Authority, the Mayor must produce and keep under review a spatial development strategy (SDS), which is better known as the London Plan. The Local Authorities' Local Plans have to be "in general conformity" with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London.

The purpose of the London Plan is to provide an integrated economic, social, environmental and transport framework for the development of London over the next 20-25 years. The latest London Plan was published in March 2016 and it is a consolidated version based on the 2011 plan (under the previous Mayor Boris Johnson) – including three minor alterations (Revised Early Minor Alterations 2013, Further Alterations 2015 and Minor Alterations 2016).

The London Plan sets out the Mayor's vision for the sustainable development of London as a leading global city. Achieving that vision means ensuring London makes the most of the benefits of the energy, dynamism and diversity that characterise the city and its people; embracing change whilst promoting its heritage.

London's World Heritage Sites therefore play an essential part of London's role as a World Class City and the London Plan sets out strategic heritage policies. These include the management of London's heritage assets and the wider historic environment, conservation and enhancement of London's World Heritage Sites for their Outstanding Universal Value and settings, sustaining and enhancing strategic views, and clarity on the appropriateness of tall buildings as part of the decision-making and plan making process.

As part of implementing the London Plan, the Mayor has published Supplementary Planning Guidance (SPG) on a number of key issues that have an impact upon the management of the historic environment. Of particular importance is the updated London View Management Framework SPG (published in 2012) which provides guidance on the protection of important designated views and includes 10 views of the Westminster World Heritage property. It also introduces the concept of Protected Silhouettes. London Plan Policy 7.12 states that 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.

London Plan Policy 7.10 also states that development in World Heritage Sites and their settings should conserve, promote, sustainably use and enhance their authenticity, integrity and significance, and Outstanding Universal Value. Development should not cause adverse impact to World Heritage Sites or their setting, which is likely to compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity and significance. The Palace of Westminster, the Tower of London and Maritime Greenwich World Heritage Sites appear in a number of Designated Views. Where it is clear that any change to the silhouette of these World Heritage Sites (as seen from the Viewing Place) will damage their background setting, the Management Plan should specify that the silhouette be preserved. In cases where the Visual Management Guidance specifies protection of the silhouette of a World Heritage Site, a purple line is drawn above and below the image of the Designated View to which the guidance refers.

Where development proposals are likely to affect the settings of World Heritage Sites, reference should also be given to the relevant World Heritage Site Management Plans. The Mayor's Supplementary Planning Guidance on London World Heritage Site – Guidance on Settings also provides further guidance for understanding the Outstanding Universal Value of World Heritage Sites and should be consulted where appropriate. It is also recommended (but is not obligatory) that Historic England be consulted on all relevant proposals at an early stage.

The Mayor also published an SPG on Character and Context in 2014. This SPG provides guidance on understanding existing local character and context, which helps in providing a more consistent approach to managing change in the settings of London's World Heritage Sites.

Other relevant policies which may have an influence on World Heritage Sites include the Central Activities Zone (CAZ) SPG, the Opportunity Area Planning Frameworks (OAPFs), and the Planning Briefs relevant for the area of the World Heritage Site. The London Plan of March 2015 identified 38 Opportunity Areas and seven Intensification Areas. Opportunity Areas are defined as brownfield lands, which have significant capacity for development, and Intensification Areas are built up areas, which can support redevelopment at higher than existing densities. The Opportunity Area Planning Frameworks is a particularly important policy as it encourages strong development initiatives in areas that may be of importance to the settings of World Heritage Sites.

## **2.4 Westminster World Heritage Site Protection Framework**

The Westminster City Plan, adopted in November 2016, sets out the planning framework for Westminster for the next 15-20 years. It includes a spatial vision and strategic objectives, a spatial strategy, and a monitoring and implementation framework for achieving the spatial vision. It also contains key policies on the management of the historic environment including Heritage (S25) and Views (S26), which protect strategic views and note that Westminster is generally inappropriate for tall buildings. Other relevant policies include internationally nationally important buildings and uses (S27), design (S28) and the Blue Ribbon network (S37), as well as policies in the Local Spatial Policies section focusing upon sub-areas of the City including the Victoria Opportunity Area (S4) that is in close proximity to the Westminster World Heritage Site.

The majority of the policies in the City Plan are strategic policies, which are not sufficiently detailed to enable a determination of planning applications. Older Unitary Development Plan policies (2007) are gradually being replaced with new detailed policies for management of development. This will include policies on the historic environment, views, tall buildings and the World Heritage Site. Once adopted, these will be incorporated within the City Plan.

In 2008 a conservation area audit (SPD) was produced for Westminster Abbey and Parliament Square Conservation Area. This includes detailed characterisation of the area around the World Heritage Site and identifies local views, buildings and uses, which contribute to the Outstanding Universal Value and setting of the World Heritage Site and management proposals for the area.

The World Heritage Property of Palace of Westminster and Westminster Abbey including Saint Margaret's Church also has a site management plan dated 2007. This plan identifies a number of key management issues such as care and protection of the building fabric, setting and views, activities and uses, tourism, education, traffic, and security. It then provides an overall vision for the property and 28 objectives for its better management. An implementation strategy is also provided. This plan is currently being updated (see section 3.2 below).

A set of draft attributes has been prepared for the site. Once consultation has been undertaken and an amended version agreed, this work will be incorporated within the updated management plan.

For the Palace of Westminster, the current edition of the conservation plan was published in 2007 (first edition awarded the Silver Europa Nostra Prize for Cultural Heritage). The conservation plan is due to be updated during the next six months, and augmented to provide a conservation management plan with policies specifically focussed on potential future works. The update is due for completion in draft by the end of July and for issue by the end of September 2017.

## **2.5 Adjoining Borough Development Plan Updates**



Although the property is located within the City of Westminster, much of its setting covers adjoining boroughs. The neighbouring Boroughs of Lambeth and Wandsworth also include policies in their Local Plans for the protection of the setting of the Westminster World Heritage property.

There are several London Borough Development Plan updates for Lambeth Borough, Southwark Borough, and Wandsworth Borough, which have an impact on the understanding of the setting of the WHS. They include:

- Lambeth: Lambeth Local Plan (2015); Conservation Area Boundaries; Conservation Area Character Appraisals; Lambeth Approaches and Visibility Study; Lambeth Management and WHS Approaches
- London Borough of Southwark Policy Framework
- London Borough of Wandsworth Policy Framework

### 3 IDENTIFICATION AND ASSESSMENT OF ISSUES

According to the terms of reference of the mission, there were five key issues to be examined during the visit. These are:

1. the urban planning and development framework including long-term tools and methodologies for dealing with development pressures, and in particular tall buildings;
2. the relationships between the variety of stakeholders that are involved in planning and decision-making related to development in the World Heritage property and its setting, with an emphasis on ensuring that the advice of Historic England and the World Heritage Committee and its Advisory Bodies is taken into account;
3. the strengthening the management of the property including the finalization of the management plan;
4. the conservation activities underway and being planned at Westminster Palace and Westminster Abbey
5. Other considerations related to the Outstanding Universal Value of the property.

Many of these issues are interrelated, however, and the mission team instead developed a slightly different structure in looking at the key issues at the property. With this in mind, the report will look at the following key issues:

1. Key Issues at General Level
2. Site Management
3. Urban Planning and Development Projects with an Emphasis on Tall Buildings
4. Urban Planning Issues at Westminster
5. Restoration of Buildings within the Westminster World Heritage Property
- 6.

Linking the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property to its Larger Context in London and the United Kingdom

#### 3.1 Key Issues at General Level

##### 3.1.1 Management and protection as a part of OUV

During the course of the mission, Representatives of the State Party spoke often of management and protection as being something that is outside of the concept of Outstanding Universal Value. The argument was made several times that while there may be some significant problems with management in regard to the approval process for development projects, the development and implementation of the management plan, etc., that it was felt that this did not have a significant impact on the OUV. It is important for all those professionals working on planning and management for the property (and indeed all relevant stakeholders) to be aware that a significant loss of capacity for management and protection of the property is considered by the World Heritage Committee as a diminishment of the OUV itself. It should not be considered as a secondary issue, but one that is directly linked to OUV – underlined by the fact that “management” is an inseparable part of the Statement of OUV.

##### 3.1.2 Interpretation of policies in the decision-making process

A wide range of policy documents at the national and local levels – strategic papers, framework documents, guidance documents, and supplementary guidance – are available and should be followed during different steps of the decision-making process (See Chapter 2 above). In the case of the London and its administrative units, a large number of planning documents have been issued relatively recently. The spirit, conception and content of those documents

represent good intentions and lofty ideals. These documents express a need to promote positive heritage preservation outcomes while at the same time taking into account the social, community, and development needs of London. In spite of the clearly positive expressions found in the documents, however, the mission team has found that there are often problems in interpretation of these documents at the time that decisions must be made. These problems of interpretation may occur at the level of the developers themselves, planning and conservation officers who are making initial determinations for a project, or may occur higher up at the borough, city, or even national levels. This points to a situation in which it may be that the documents themselves are too ambiguous to be useful in guiding the final planning decisions. While it is difficult to produce planning documents which are 100% clear and without ambiguity in ensuring no negative impact on OUV, it is important that there be enough concrete guidance to allow for a more consistent judgement by those in a decision-making role. Most of the documents can be interpreted widely enough that they may not help developers to understand and plan their projects with enough certainty, nor are they as useful to the decision-makers who must pass judgement on the final development proposals.

### 3.1.3 The issue of balance of benefits vs. protection of OUV

It is a standard practice in the United Kingdom that the harm to a heritage resource by a proposed development may be balanced by the positive benefits of the proposal. In the case of “substantial harm” or total loss of significance to a designated heritage asset, permission should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. (Paragraph 133 of the NPPF). In the case of “less than substantial harm”, the negative impact can still be weighed against the public benefit of the proposal, including securing its optimum viable use (Paragraph 134).

This framework, takes into account one type of a sustainable development approach. The World Heritage Committee (and General Assembly of States Parties) has recently approved a sustainable development policy, also trying to ensure positive development. Questions still remain, however, as to where to set the balance between protection and development. In fact, perhaps it is not a question of balance between them at all, as this supposes that they are in opposition to each other. Instead, a more useful framework would be to consider what kinds of positive social, economic, and environmental benefits can be derived from development projects that take as their starting point, the safeguarding and protection of the OUV of World Heritage properties that may be affected.

The mission team finds that for properties on the World Heritage List, which by their very definition have Outstanding Universal Value, this threshold or balancing between potential harm to the OUV and other public benefits should be weighted very heavily towards the safeguarding of the OUV of the property and should commence with a presumed objective that OUV should be protected.

Decisions that have been made in the recent past to go ahead with a number of development projects in the setting of the Westminster World Heritage Property (from Elizabeth House to the Nine Elms project) seem not to be giving enough weight to the negative impact on the OUV of the property. By nominating the property for the World Heritage List, the State Party, itself, has effectively promised to safeguard its OUV and to not undertake any deliberate measures that might damage directly or indirectly the property (Article 6 of the Convention). The mission team is of the opinion that this balancing act must therefore be founded on protection of OUV. This does not rule out all development. Rather there is a need to creatively develop areas in such a way as they build on the OUV of a property and use it as a catalyst for sustainable development. But this approach does place a much stronger burden on the State Party to ensure that the OUV of the property is protected as part of any development proposal within a

property or its setting. This approach should be used in the planning and decision-making processes at various levels.

#### 3.1.4 Relationships between the borough, city, national, and international levels in making decisions

According to the United Kingdom administrative system the level of “autonomy” in each level is relatively high. In the context of the Greater London the first level is the council of a borough, understandably dedicated to assure best conditions for its citizens’ life-standards and benefits, including both heritage preservation and development.

Following principles of subsidiarity, making decisions at the lowest level is fully accepted as a good practice for planning. It does not mean, however, that the lowest possible level is always the lowest relevant level. Coordination between decision-making bodies at various levels is important, and it is crucial to ensure that decisions which have a wider impact on the OUV of a World Heritage property and its setting be made at a level at which the potential substantial or less than substantial harm to OUV can be considered in clear and concise manner.

The challenge is that impacts – e.g. visual and traffic impacts – on the OUV of the property often arrive from outside of a given borough, which has jurisdiction only inside of its own territory. Harmonization related to planning process and planning permission issues, between the adjacent boroughs and also with others which are at a larger distance, should essentially be based on the implementation of the Greater London Authority level plans, policy documents, strategies and guidelines. The Greater London Authority should have a role in ensuring that its policies are being met within the planning decisions of the individual boroughs, and in this regard, the mission team is of the opinion that the Greater London Authority should become more active in decision-making on projects that have a potential to impact on the OUV of a property.

The national level should also play a strong and consistent role in decision-making when OUV is potentially affected. The National Government does have the power to “call in” planning applications that are submitted to local planning authorities and to take planning decisions itself. Government policy states that while it is better, wherever possible, for planning decisions to be taken at the local level, it does have the power to “call in” development proposals which:

- may conflict with national policies on important matters;
- may have significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority;
- could have significant effects beyond their immediate locality;
- give rise to substantial cross-boundary or national controversy;
- raise significant architectural and urban design issues; or
- may involve the interests of national security or of foreign Governments

Given that the World Heritage Convention is an intergovernmental instrument, which the United Kingdom ratified in 1984, development projects which have a potential negative impact on OUV would almost always meet more than one of the above criteria. The mission team is therefore, respectfully, of the opinion that the national government should consider calling in development projects that have a potential to impact OUV.

#### 3.1.5 Role of Historic England and strengthening its role as advisor

The mission team noted that the role of Historic England as a heritage advisor to the various levels of government is sometimes taken into account, but often, for controversial or difficult projects, is not taken into account.

Since ratifying the World Heritage Convention, the United Kingdom has often been in a “leading position” concerning good practices in conservation, preservation and management issues related to the World Heritage properties. A number of conservation and management requirements found in the “Operational Guidelines” have their origin from the practice in the United Kingdom. One of the major repositories of professional knowledge and practice is Historic England (formerly English Heritage).

In the context of London’s World Heritage properties, the role of Historic England is fundamental. However, as has been noted in the past, its advisory position on development projects with the potential to affect OUV is sometimes not given the appropriate weight in decision-making. One example (but one of several) is the Elizabeth House development, which was approved over the objections of Historic England. In the opinion of the mission, as the main advisory body at the national level representing professional opinion, and with much institutional experience in dealing with issues related to the World Heritage Convention, the position of Historic England must be strengthened and given greater weight when development proposals are being decided on at all levels.

It is also worth noting that if Historic England objects to a proposed development as having a potential negative impact on OUV, it is highly likely that when the issue come to the attention of the World Heritage Committee, there will also be concerns expressed by that body. It would therefore be in the interest of the State Party to deal with any objections by Historic England at an early stage in order to avoid the much more time consuming process of State of Conservation Reporting to the World Heritage Committee. It would seem to be in the interest of all stakeholders for this advice to be given its proper weight.

#### 3.1.6 Role of the World Heritage Committee and its Advisory Bodies in providing advice

It should further be noted that there is often a mismatch between the timeframe for development approvals at the national level, and the need to sometimes pass proposals through the World Heritage Committee and its Advisory Bodies for advice and recommendations. For this reason, the State Party sometimes approves proposals, despite concerns expressed by the World Heritage Committee. The State Party has on occasion informed the Committee that there is nothing that can be done to change a proposal, since it has already been approved. The Committee and Advisory Bodies are somewhat constrained by the cycle of meetings, while the State Party is constrained by its rules and regulations for determining to development proposals (although in the case of Government projects the State Party, or its agencies, may be in a position to control when applications are made or exhibited and statutory timeframes commence).

There are no “magic solutions” to this problem. Nevertheless, a combination of steps could be explored including earlier consultations by the State Party with the Advisory Bodies, quicker turn-around of advice by the Advisory Bodies, changes to regulations that allow more time for proposals with a potential to impact OUV, and more consistent calling in of proposals by the national government, which might allow for more time for a solution to be found. While not solving the problem, it should be possible to find creative solutions to at least diminish it.

#### 3.1.7 Recommendations on Issues at a General Level

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

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

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

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

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

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

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

## **3.2 Site Management**

### **3.2.1 Management plan including the deadline for revision in 2017**

The Westminster World Heritage Site Management Plan was put into place by the property's Steering Group (see section 3.2.2) in 2007. There is no coordinator or site manager, and implementation of key objectives is undertaken by the key stakeholders – the Palace of Westminster, Westminster Abbey, and Westminster City Council – working within the Steering Group framework. In discussions with the mission team, it was revealed that the lack of a single point of reference for implementation of the plan is a weakness, as there is no central authority to ensure that actions are undertaken. It is also useful to note that other actors, Lambeth Council for example, should also be playing an implementation role given their proximity to the site across the river.

A new management plan, as requested by the Steering Group, is currently being developed and the mission was informed that completion is foreseen for late summer 2017 (updated to

October 2017 during the writing of this report). The aim of the new plan will be a more operation-oriented management tool for the site, and its completion should be considered as a priority. The lead for the management plan, as agreed by the Steering Group is the Westminster City Council. One step towards the creation of the management plan was the development of a list attributes that carry the OUV as expressed in the SOUV. That list is currently being circulated for comment and will be included in the management plan.

The mission team was not able to have a close look at the structure of the new plan, but is of the opinion, that a central site manager should be appointed in the new management plan and that clear responsibilities be assigned to the various stakeholders and indicators for implementation established. Cooperative mechanisms must also be developed, not just with Westminster Palace and Westminster Abbey, but also with the other boroughs and the GLA. The management plan should include issues related to the setting of the property. Such a cooperative mechanism will most likely be accomplished through a revitalized and strengthened Steering Group.

One issue of importance within the management plan should be the creation of a Disaster Risk Management Plan for each of the buildings on the property and for the property as a whole. This DRM plan should include both natural and potential man-made disasters.

### 3.2.2 Steering Group

The formation of a Steering Group was recommended as part of the 2007 Site Management Plan, but was not established until 2011. Membership of the group includes representatives from the following institutions: The Dean and Chapter of Westminster, Department for Culture, Media and Sport, Greater London Authority, Historic England, ICOMOS-UK, Lambeth Council, The Parliamentary Estates Directorate, Southwark Council, Transport for London, Wandsworth Council, Westminster City Council, and Westminster School. Westminster City Council serves as Chair and Secretariat for the group.

The purpose of this Steering Group is to share information and discuss issues affecting the World Heritage Site and to review the Management Plan at appropriate intervals. The group has a primarily consultative and co-ordination role.

The mission team was informed, however, that after its first meeting in 2011, the Steering Group met only sporadically, and then not at all between 2013 and early 2016. At that time, the DCMS requested that Westminster City Council re-establish the group, which it did in early 2016. The mission team considers this a weakness in the current management of the property, as a well-organized and effective Steering Group could be an important component of a well management property.

The mission team highly appreciated the dedicated approach in each borough, related to its own citizens' benefit. However it becomes also clear that each borough largely acts separately, in spite of the fact that there is a need for close cooperation to face the challenges of protecting the World Heritage property, given their physical proximity and the large view cones in question. There is coordination on a certain level between boroughs but the question remains open because of the timing of that coordination. The Steering Group could provide a means of cooperation, consultation, and agreement, allowing for a more consistent interpretation of the various planning and guidance documents across the boroughs.

As already touched upon above, a revitalized Steering Group could also strengthen the role of the Greater London Authority, which should be considered as a necessary and important step forward. The role of Greater London Authority in policy and strategy setting issues is already well developed and could assure a solid basis for planning regulations and guidance, allowing the boroughs to then develop their own regulation in synergy among them.

The mission team, therefore, recommends that the Steering Group be re-established and revitalized, not just as an occasional forum for information sharing, but with a stronger role in overseeing the implantation of the management plan for the property. The chair of the group could remain with the Westminster City Council or an arrangement could be envisioned which includes a representative of the Greater London Authority as a co-chair capable of solving challenges and bridging differences between the boroughs.

### 3.2.3 Recommendations on Site Management

Recommendation 8: The new management plan for the World Heritage property, which is in preparation, should be finalized as soon as possible by the Westminster City Council, in cooperation with the other members of the Steering Group. This management plan should consider management and decision-making issues within the World Heritage property and its setting. It should also include disaster risk management at the property and in each of the buildings of the property. The plan should contain clear actions for its implementation taking into account all members of the Steering Group and should assign responsibilities as well as indicators for implementation to allow for an evaluation of its implementation over time.

Recommendation 9: The Steering Group should be revitalized, with regular meetings and a more action oriented perspective in regard to overseeing the implementation of the Management Plan. The Greater London Authority should also take a more active role in the Steering Group (perhaps becoming a co-chair) to bridge differences amongst the boroughs.

## 3.3 Urban Planning and Development Projects with an Emphasis on Tall Buildings

By means of an introduction to this section, the problem of tall buildings and large development projects in World Heritage properties and their settings is one that is not unique to London or the United Kingdom. It has been one of the issues that the World Heritage Committee has been dealing with for almost 20 years, and was one of the key factors that led to the development of the UNESCO Recommendation on the Historic Urban Landscape (HUL). As stated in the HUL Recommendation, “rapid and frequently uncontrolled development is transforming urban areas and their settings, which may cause fragmentation and deterioration to urban heritage with deep impacts on community values, throughout the world”. The question becomes, what kind of growth is compatible with the ongoing protection of the OUV of World Heritage properties, and in this specific case, and how can we ensure that as London continues to develop, it does so in a sustainable manner, with respect for its four World Heritage properties.

The question of tall buildings is one that is being debated widely in London and the United Kingdom. There are civil society groups such as the Skyline Campaign in London that are active in this area, and there are many articles in the press that make arguments for and against tall building developments.

The purpose of this mission is not to answer the question of whether or not London should have tall buildings, but rather to look at the case of the World Heritage property of the Palace of Westminster and Westminster Abbey including Saint Margaret’s Church, and determine whether existing and planned developments have impacted negatively on the OUV of this property.

The problem of tall developments at this property was already noted in 2007, and the Committee has asked the State Party over time to develop tools to help it ensure that developments do not have a negative impact on the OUV of the property. Planning tools and



policies have been put in place at the London-wide and borough levels in regard to developments in general and tall buildings in particular. A few of these are quoted below:

The London Plan (Policy 7.7 – Location and Design of Tall and Large Buildings) states that “tall buildings should not impact on local or strategic views adversely” and that “the impact of tall buildings proposed in sensitive locations should be given particular consideration (including World Heritage Sites).” Its policy on World Heritage Sites (7.10) states that, “development should not cause adverse impacts on World Heritage sites or their settings. In particular it should not compromise a viewer’s ability to appreciate its Outstanding Universal Value [....]”.

The London View Management Framework (Policy 7.11) designates a list of strategic views to “keep under review”, including views “towards strategically important landmarks by designating landmark viewing corridors and wider setting consultation areas.” “The Mayor will also identify and protect aspects of views that contribute to a viewer’s ability to recognize and appreciate a World Heritage Site’s authenticity, integrity, significance and Outstanding Universal Value”. Significant views of concern for the World Heritage property include those from Westminster and Lambeth Bridges, Parliament Square to the Palace of Westminster, and Albert and Victoria Embankments, among others.

The local borough plans also to lay out policies in regard to tall buildings that may affect the World Heritage property. Among a number of policy provisions, the mission team notes a few of the most relevant.

Westminster Policy DES3 states that, “high buildings will not be permitted where the development would intrude upon strategic views or upon the setting of the Palace of Westminster or upon the Westminster Abbey World Heritage site.

Lambeth Policy Q19 states that, “Development affecting the setting of the Westminster World Heritage Site will be required to demonstrate that it preserves or enhances the Outstanding Universal Value, authenticity and integrity of the World Heritage Site.”

Southwark Policy 3.18 states that, “Permission will not be granted for developments that would not preserve or enhance the setting of a World Heritage Site.”

Wandsworth Policy IS 3 states that “Views of the Westminster World Heritage Site will be protected in accordance with the London Plan 2015 and the London View Management Framework.”

As general statements of principle, the Mission Team finds that these concepts to be admirable. The test, however, comes in looking at what is actually approved, what is built on the ground, and how it affects the OUV of the property.

### 3.3.1 Buildings already consented, built or in the phase of building

The mission considered a number of developments, which have been given planning permission and are in various phases of construction. The most important of these are Elizabeth House and the Shell Building in Lambeth, and the Nine Elms in Wandsworth. In these cases, the World Heritage Committee has considered their potential impact on OUV. (Elizabeth House was mentioned for the first time in 2007). Without going through their full histories, the current status of these developments is:

Elizabeth House: A revision of the 2007 scheme was made in 2012 and was approved with objections filed by both English Heritage (now Historic England) and the Westminster City Council. The Secretary of State decided not to call in the application. A legal challenge by English Heritage and Westminster City Council, which questioned the fact that the Secretary

of State did not call in the application, was rejected. The current status of this project is that works have been undertaken on the site. Implementation is not proceeding, however, as the property is up for sale. The fact that work has begun, however, allows any buyer to continue with the works as approved.

Shell Centre: A project proposal for a scheme with buildings up to 37 storeys was submitted in 2012, was approved by the Lambeth Council over the objections of both English Heritage and the Westminster City Council. The project is currently being implemented and will be completed in 2019.

The following photographs show the Shell Centre and Elizabeth House sites from various points in Parliament Square. It is worth noting that the effects of the existing Shell Centre and the construction cranes changes depending on the viewpoint. This is why a dynamic viewpoint analysis is important.



View point without disturbing building in the background.



Only a few meters from the above point: the Shell Centre in the background (white arrow)

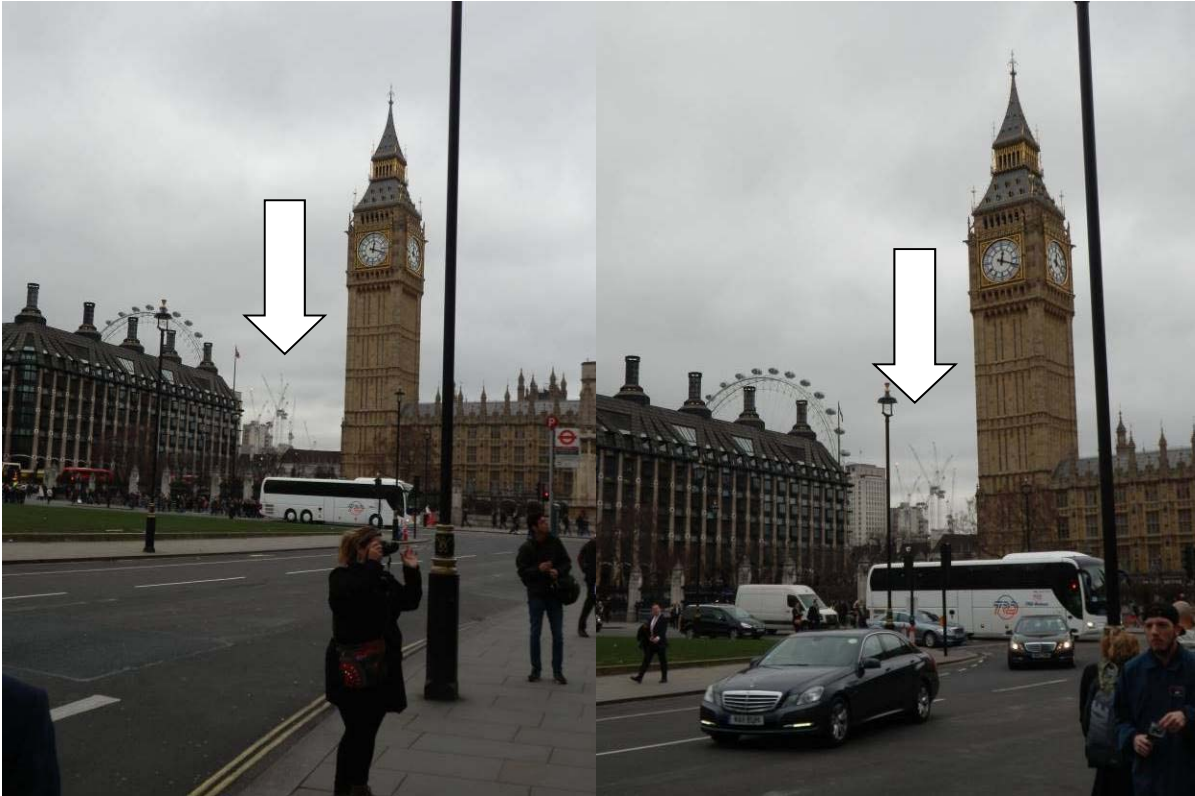


From a larger distance: Shell Centre construction cranes.



From a larger distance: Shell Centre construction cranes near Elizabeth Tower.  
The new building is going to narrow the "gap" and diminishes the vertical accent of Elizabeth Tower.





Disturbing effects of the existing Shell Centre and construction cranes. Its redevelopment along with the development of Elizabeth House will add to this, if construction goes ahead.





The view from the sidewalk across the street from Parliament Square looking towards Westminster Bridge through the gap between Elizabeth Tower and the buildings across Bridge Street



Developments in the Vauxhall, Nine Elms, Battersea Opportunity Area seen from Lambeth Bridge. One Nine Elms is in the larger setting of the World Heritage property and would affect views from Westminster Bridge looking south. It contains towers of up to 200 meters high. The Secretary of State declined to call in the proposed development and it was approved in October of 2012 with minor modifications in 2014. It is currently under construction, and is part of a larger Opportunity Area.<sup>1</sup>

<sup>1</sup> Opportunity Areas (OA) are London's major source of brownfield land which have significant capacity for development – such as housing or commercial use - and existing or potentially improved public transport access.





Vauxhall and Nine Elms developments on the left with Westminster Palace on the right and Millbank Tower in the middle ground – seen from the London Eye

It is useful to quote the analysis of the Advisory Bodies and World Heritage Centre found in the State of Conservation Report in 2015.

*It is noted that the State Party has not taken any steps to intervene and review the development projects of Nine Elms Regeneration Development Market Towers, Vauxhall Cross and Vauxhall Island Site, which are in an advanced construction phase and according to English Heritage's (now Historic England) advice, will harmfully impact on the OUV of the property. This impact shall be particularly noticeable in views from Westminster Bridge looking west where, together with the already existing Millbank Tower, the new developments contribute to a jagged sense of enclosure to this important view.*

*It is also noted that permission has been granted for the Elizabeth House development scheme, which will have a substantial adverse impact on the important views to and from the World Heritage property."*

The mission team, having discussed the issue with local officials, and having visited the site to look at some of the views in question, confirms the negative impacts on the visual quality of the Property and its setting and therefore on its OUV arising from the construction of these tall buildings.

One problem is connected with the highly dynamic character of the social and economic development of Greater London and in particular with the so called "opportunity areas" where construction of tall buildings is planned and welcomed. These areas give the priority to

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Typically they can accommodate at least 5,000 jobs, 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure.

The Mayor works closely with the boroughs and other stakeholders in developing Opportunity Areas. He provides encouragement, support and leadership in preparing and implementing Planning Frameworks, which serve to help realise the potential of these areas.

development criteria and less to protection of visual qualities of protected properties and sites, despite some of the policy guidance quoted above in the report which aims to protect heritage.

As already stated above, a significant problem is that in the planning consent process, the decision-making body can “balance” the economic and social benefits of a development with the potential harmful effects on the OUV of a World Heritage property. While this balancing act can be understood in general for decisions affecting cultural heritage sites, the extra burden to the State Party in regard to its obligations under the World Heritage Convention to the protection of OUV should give significantly more weight to the decision-making process in order to avoid definitely any adverse impact on OUV.

Yet, the advice of the national heritage advisor, Historic England, is often not taken into account in these local planning decisions. In both the Elizabeth House and Shell Centre cases, the heritage advisor objected because of its concern for negative impact on OUV. It is therefore not surprising that at the international level, the World Heritage Committee and its Advisory Bodies would also find negative impacts. Yet despite objections from the heritage advisor, once the building permission is issued there is almost no room for the withdrawal of the planning consent, if the realization is already started. The State Party State of Conservation Report states:

*“... the Market Towers (now 1 Nine Elms Lane), Vauxhall Cross and Vauxhall Island Site developments in the Vauxhall/Nine Elms regeneration area, were approved by the local authorities and decision notices were issued. Therefore it was not possible for the State Party to prevent the implementation of these permissions. Updates on the progress of these schemes, and others of a similar scale and location are provided [...]”.*

We therefore, find ourselves in a situation where ongoing construction projects do have a negative impact on the OUV, but they cannot be stopped due the fact that planning permissions have been granted and work has begun, despite concerns that have been expressed by the World Heritage Committee over a number of years. In order to prevent this negative situation, the mission team is of the opinion that the national government should consider calling in development projects that have a potential to impact OUV in each and every cases.

The Mission Team very much regrets that these developments have been approved and are being constructed. Nevertheless, after careful consideration, the Mission Team has decided that in and of themselves, they are not sufficient to warrant a listing on the World Heritage List in Danger at this time. The argument for Danger Listing is very close, however, and if developments which affect OUV continue to be proposed and approved, the threshold is going to be reached (because of the result of a cumulative impact), therefore the Danger Listing would be necessary in the near future.

### 3.3.2 Granting of permissions in the future

Despite the planning guidance at various levels, and the London View Management Framework, the actual results on the ground from current practice are leading to an erosion of the OUV of the property. For this reason, there are a number of issues, which will need to be dealt with by the State Party, the Greater London Authority and the various borough councils, in order to ensure that the OUV does not continue to be negatively affected by new developments. There is a critical need for a proactive approach related to granting of permissions in the future which take into account the OUV of the property and the protection of its setting.

The planning process must take into account the impact, not only of single development proposals, but also of cumulative effects of a number of projects which may be adjacent to each other, and which may together have a greater impact on the setting than the impact of each one alone. These projects may be already approved or still in the planning stages, but there is a need to create a system which can look at these cumulative impacts. Elizabeth House and the Shell Centre is one area where cumulative effect must be measured. Buildings planned and already consented in the "Vauxhall opportunity area" (Nine Elms complex and others) show another striking example of this cumulative effect. Vertical accents formerly assured only by historic buildings (towers, cupolas and pinnacles) are losing their clear visibility and outstanding character. Newly erected tall buildings in a proliferation result a higher but almost homogeneously "closed", horizontal skyline. By continuing to "raise" the skyline, the effect is to diminish the scale and importance of the most prominent historic buildings such as the Palace of Westminster. As it is stated in the OUV: "The instantly recognisable location and setting of the property in the centre of London, next to the River Thames, are an essential part of the property's importance. This place has been a centre of government and religion since the days of King Edward the Confessor in the 11th century and its historical importance is emphasised by the buildings' size and dominance. Their intricate architectural form can be appreciated against the sky and make a unique contribution to the London skyline."

In connection with this World Heritage property, there is no designated buffer zone. Given the fact that negative impacts on the integrity of the site are coming from outside the limits of the World Heritage property at the first glance it would seem logical to ask the question about the necessity of a well identified and properly defined buffer zone. However, taking into account the possible impact of high-rise building erected in a considerably large distance from the property, the idea of the creation a buffer zone does not appear as a realistic and viable solution to this specific problem of tall buildings within the visual catchment of the World heritage property. It may, however, be useful for other planning issues. The efficiency of an unmanageably large buffer zone for tall buildings would be highly doubtful, given the dynamic character of developments in both height and spatial distribution within the "opportunity areas" in the territory of Greater London Authority. Despite these considerations, protection of the setting and the skyline must be assured in order to protect the OUV of the property. Policy documents, framework regulations and guidelines currently use a system which defines the most important/sensitive viewpoints, and tries to protect these views. Clearly, this system has not functioned, which has led to the construction of buildings which do impact on OUV.

The criteria for the selection of the viewpoints is also an issue as they have a static character. The result remains to some extent still questionable, given that by moving a small distance along a street, a development that had "no impact" on the visual qualities of the property suddenly has a much larger impact. This is true, for example, from some of the viewpoints in Parliament Square. The selection of viewpoints is also important in that there are often unexpected viewpoints, which are also important for the visual quality of the property. The mission team visited the Elizabeth Tower and went up to Big Ben during the mission, and it was noted that when in the tower and looking along the length of the Palace of Westminster, the view of the palace towers have been disturbed by a mix of both the Nine Elms development and the much older Millbank Tower. This view, while not a protected view, is an important one, especially for the many visitors to the tower.

The following are two views from the Elizabeth Tower looking along the length of Westminster Palace, showing both Millbank House and the Nine Elms tower disrupting the view between Victoria Tower and Central Tower.





In order to ensure a more comprehensive and rational system of view control, the local authorities are in the process of developing a 3D modelling system. This would be a useful tool for creating a more dynamic system for controlling views to and from the World Heritage property, and allowing for a better evaluation of the possible impact of planned new construction. A 3D system was presented during the mission, and looks promising although it is still in an experimental phase. It is important to point out, however, that this system should also take into account the potential cumulative effects of development proposals (whether approved or not) to be better able to understand the full impact on OUV.

The role of Historic England must be reconsidered within the planning process. Historic England has been at the forefront of good practice in heritage conservation and management for many years. Its experts are often called on to undertake missions in other countries, and many of the accepted practices within the World Heritage system have their origins with Historic England. In the context of London's built cultural heritage, the role of Historic England is fundamental. Unfortunately, its advice is often not given the proper weight in the planning

consent process where heritage concerns wind up taking a back seat to other development concerns. The advisory role of Historic England needs to be strengthened and accepted as the advisory organization representing good practice and professional opinion, not only at the national level but also in accordance with international standards and requirements of the World Heritage Convention and its Operational Guidelines.

### 3.3.3 Recommendations on Urban Planning and Development Projects with an Emphasis on Tall Buildings

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

Recommendation 11: The Mission Team does not recommend listing the property on the World Heritage List In Danger at this time, despite the negative impacts that developments such as Elizabeth House, Shell Centre, and Nine Elms, all three in construction, have on the OUV of the property. Nevertheless, the cumulative effect of these developments with other planned developments could lead the Committee in the future to consider such In Danger listing.

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

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

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

Recommendation 15: The advice of the national heritage advisor, Historic England, should be given a much greater weight by all of the boroughs and other levels of decision-making when evaluating projects and their potential impact on OUV. It is unlikely that if Historic England has an objection to a particular project, that the World Heritage Committee and its Advisory Bodies would have a lesser concern. An objection by Historic England should already be a warning sign to the whole chain of decision-making that there will likely be issues at the World Heritage level.

## 3.4 Urban planning issues Westminster

Abingdon Street runs down the middle of the Westminster World Heritage property, with the Palace of Westminster on the eastern side of the street, and Westminster Abbey and Saint Margaret’s Church on the western side. The street is well travelled and provides an important north-south traffic connection. The mission was informed that plans are being considered to use a “phased” approach to close off the traffic on Abingdon Street and turn it into a pedestrian only zone.

The primary reason given for the closure of the street is to allow the authorities to strengthen security in the area around Parliament. The events that took place near Westminster Palace immediately following the mission give a good illustration of the need to enhance security at the property. This proposal would also have the benefit of joining the two parts of the site physically, in a way that they were joined on the map at the time of the minor boundary modification of 2008.

The mission was also informed that new and enhanced visitor-management, supported by new visitor facilities, are also envisaged. This may involve the construction of additional structures in the area both for security and visitor management objectives.

In regard to visitor management, there is a building next to Westminster Palace which holds an education centre. It was foreseen as temporary and is already scheduled to be demolished at the end of the temporary period by the terms of its planning permission. The mission team considers it positive that the whole visitor management and interpretation scheme for the site be rethought and the temporary structure demolished.

Perhaps the biggest development in regard to urban planning in the immediate vicinity of Westminster is the proposed new Holocaust Memorial which is foreseen for the Victoria Tower Gardens, south of the Palace of Westminster. This is a small plot of land bordered by palace to the north, the river to east, Abingdon Street (which becomes Millbank) to the west, and the entrance to Lambeth Bridge to the south.

The mission team was shown a presentation of the Holocaust Memorial project and had a chance to speak with representatives of the United Kingdom Holocaust Memorial Foundation. This project would bring a major new development to the area adjacent to the World Heritage property. It is worth noting that the design brief of the memorial competition did highlight that it would be adjacent to a World Heritage property and asked that the design, "address the sensitivities of the historic, political and national importance of the exceptional setting, adjacent to the Palace of Westminster, a UNESCO World Heritage Site, and the River Thames – and in one of the most visited, and recognisable parts of London."

The mission team does believe that it might be possible to place a memorial in Victoria Tower Gardens, which would not have a negative impact on OUV and could possibly enhance the overall urban experience in the area. It will be a very difficult task, however. It is advised, therefore, that the jury take full account of the importance of the World Heritage property and its OUV when considering the final design options. The Foundation may even want to have a representative of the World Heritage Centre, or Advisory Bodies to advise the jury before decisions are taken. In any event, when a design is selected and plans are more developed, this work would definitely constitute a situation where the State Party, in compliance with Paragraph 172 of the Operational Guidelines, should submit any plans to the World Heritage Centre for review by the Advisory Bodies. (One final note in regard to the planned underground museum as part of the memorial is to remind the State Party that there may also be impacts on the archaeology of the area that should be considered.)

It is also worth pointing out that a buffer zone around the property may have been useful in this case for making decisions as to the final placing of the Holocaust Memorial and its final design. While not useful for issues related to the larger setting, a buffer zone, may be very useful for informing the types and designs of new elements near to the World Heritage property. For this reason, the State Party may still want to consider the establishment of a buffer zone as requested by the World Heritage Committee previously.



Abingdon Street, which may be closed to traffic



The "temporary" education centre adjacent to the Palace of Westminster





Victoria Tower Gardens, the proposed site of the new Holocaust Memorial

### 3.4.1 Recommendations on Urban Planning Issues Westminster

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

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

Recommendation 18: The State Party may wish to reconsider the establishment of a buffer zone around the World Heritage property. While not able to deal with issues related to the larger setting, a buffer zone could be a useful tool to inform future development and design of any new elements in the vicinity of the World Heritage property.

## 3.5 Restoration of Buildings within the World Heritage Property

In addition to looking at planning issues at the property and in its setting, the mission also had the possibility to discuss physical restoration, upgrading, and new developments of the buildings within the World Heritage property. In this case, we are talking primarily of Westminster Palace and Westminster Abbey. They will be discussed in turn.

### 3.5.1 Westminster Palace

In the first instance, it must be acknowledged that the Palace of Westminster is not just a historic monument, but is also a living heritage site, which hosts the Parliament of the United Kingdom. This means that the building must both respect the needs of its place as a World Heritage property and important national monument, and also the needs of a modern seat of

democratic government. It can therefore be expected that there will be need to update infrastructure while at the same time protecting the Outstanding Universal Value of the property.

Restoration of a building in use is always a major challenge – the restoration of the Westminster Palace is an extremely large scale project with exceptional complexity, given the size, historic background and the living, continual use of the ensemble.

The mission team had the opportunity to tour the palace and look at some of the existing infrastructure within the building. The mission team was informed that a major “Restoration and Renewal” (R&R) project was currently being prepared for the entirety of the palace in order to ensure that it has all the necessary modern infrastructure (both physical and communications) for a modern parliament. A Pre-Feasibility Study was carried out in 2012, an Independent Options Appraisal was finished in 2015, and a Joint Committee report was completed in 2016 for this multi-billion pound project. Among the options considered were closing down the palace in its entirety and moving Parliament elsewhere for the necessary work period, or doing the work in phases which would be inconvenient for the Members of Parliament in carrying out their functions and would result in a project timeline of more than 30 years. The Joint Committee report recommended moving the Parliament out of Westminster Palace for the duration of the works, establishing both Houses of Parliament in nearby buildings for the interim period. Discussions are still underway, however, before a final decision is taken.

In discussion with various stakeholders, it is clear that the architectural, engineering, and conservation teams at Westminster Palace have all of the necessary expert knowledge and skills to carry out the necessary works. They are also working with Historic England on the plans. They seem well aware of the need to procure the necessary materials and specialized knowledge, which reflect the specificities of restoration of a building having World Heritage property status.

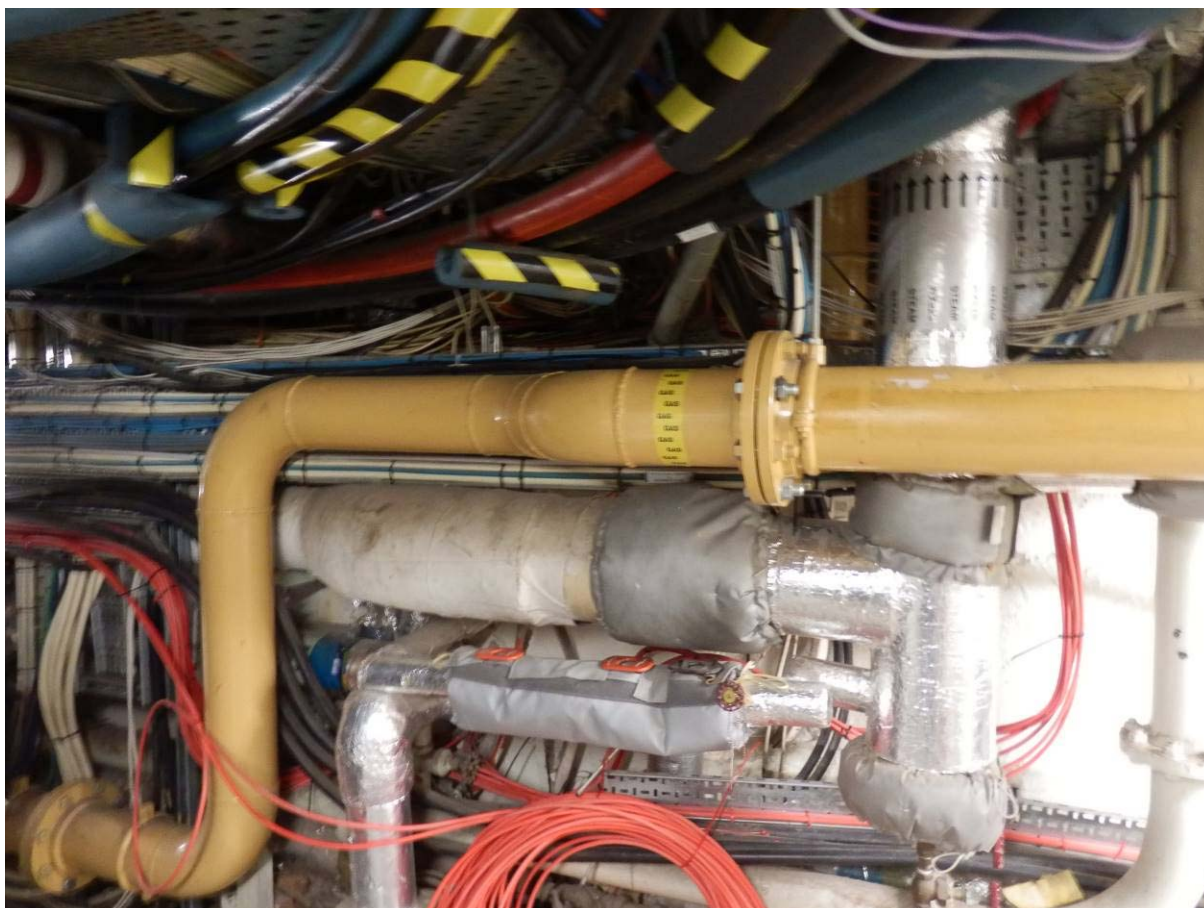
The only concern of the mission team is the immense size and scope of the work to be carried out. In carrying out work of this type, it is sometime easy not to pay as much attention to the details as is necessary given the property’s World Heritage status. In addition, there is some concern that the plans will call for some demolitions or significant changes to some buildings within the complex. This may not be a problem, as they seem to be applied only to very recent additions. But, in the interest of ensuring that any demolitions or new constructions will not have a negative impact on the OUV of the property, the State Party should provide all of the necessary information on the project as it becomes available to the World Heritage Centre in compliance with Paragraph 172 of the Operational Guidelines.

It should also be noted, that the Restoration and Renewal project offers the Westminster team an opportunity to reconsider the “temporary” structures for entertaining along the riverside façade of the palace. These seem to have taken on a more “permanent” status over time, and may not be in keeping with the need to consider the visual qualities of that side of the palace.



20<sup>th</sup> Century Addition to the Palace of Westminster on the right - This may possibly be demolished





Complex infrastructure at the Palace of Westminster – there is a need for upgrading while paying attention to retaining authenticity of original systems where possible

### 3.5.2 Westminster Abbey

The Mission Team visited Westminster Abbey and had a chance to discuss with relevant stakeholders, the ongoing project to create a new museum space in the currently unused Triforium galleries. This museum will be open to the public when completed, which has necessitated the creation of a new lift and stair access tower. Construction of this tower, located in the Poets' Corner Yard between the south elevation of the Abbey and the Chapter House, is already underway and will be completed in 2018. The plan further calls for a small bridge to link the tower to the Triforium gallery. Restoration and renovation work is also taking place in the Triforium gallery, itself. The mission team had a chance to examine these works and speak with the architect in charge of the work. Documentation on the project was also given to the mission team.

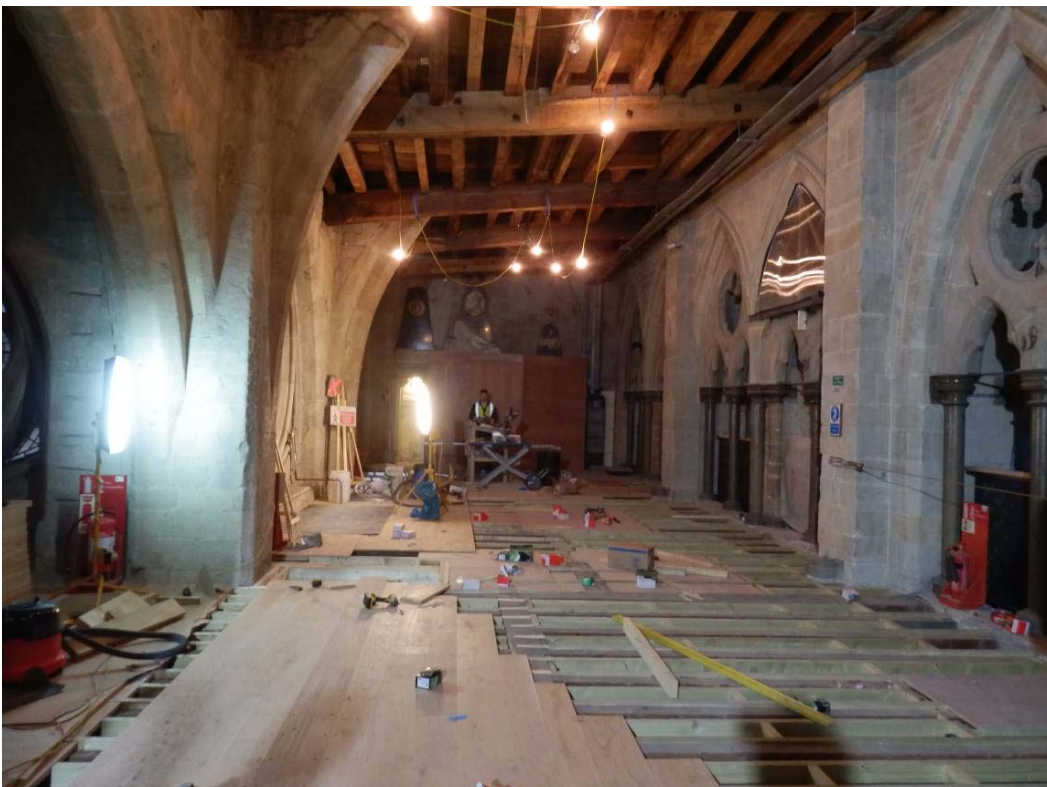
As with Westminster Palace, the Mission Team is of the opinion that the architects, conservators, museum professionals, and others working on this project have the necessary knowledge, skills, and sensitivities to carry out this very important work on a very important building within the World Heritage Property. In addition, it should be noted that Historic England has given advice to the Church authorities on the project and found that there is no negative impact on the OUV of the property. . The Mission Team share the opinion of Historic England accepting this project, nevertheless, there is no doubt that the addition of a completely new external tower to the Abbey, connected with a small footbridge, is a significant change to this structure, and the mission is of the opinion that a Heritage Impact Assessment should have been carried out (following the 2011 ICOMOS Guidance on the preparation of HIAs for World heritage properties). While it is true that this project was mentioned in the 2015 State Party State of Conservation Report, no details were provided at that time. The mission is of the

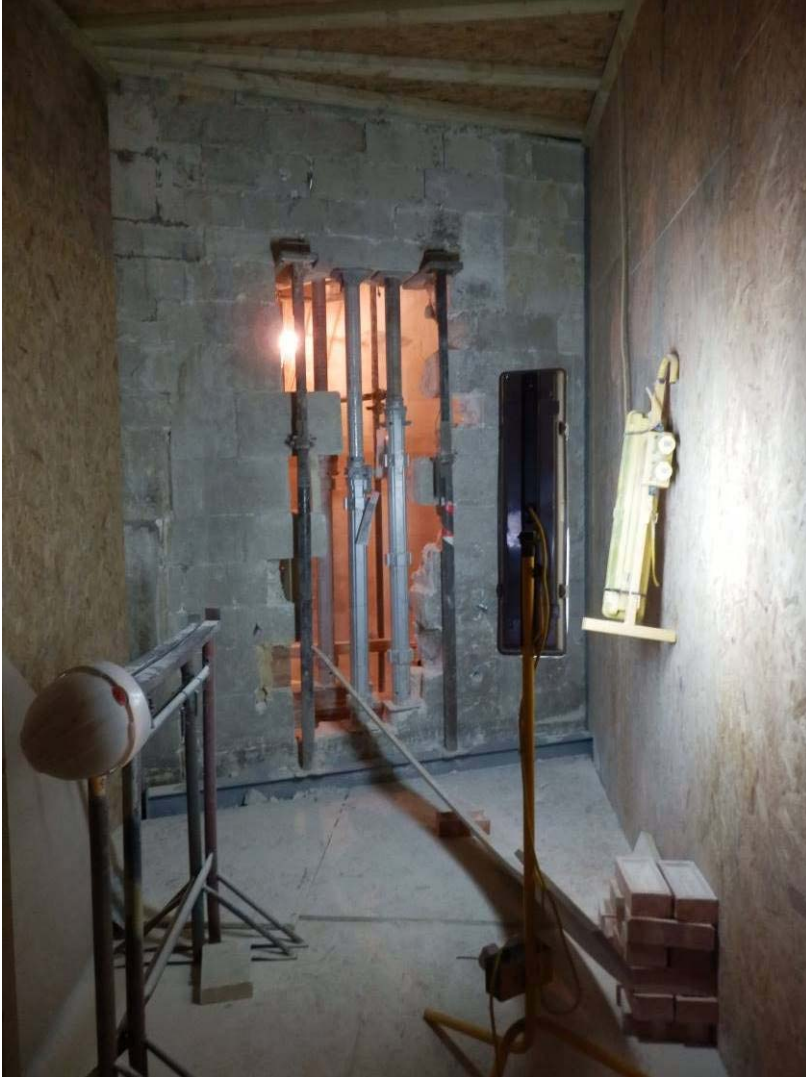


opinion that World Heritage Centre should have received a more detailed notification of these significant changes to the exterior of the Abbey in accordance with paragraph 172 of the *Operational Guidelines*. It would also have been helpful if this more detailed information had been provided at an earlier stage of project development and separately from the 2015 State Party State of Conservation report.



Restoration work and adaptive reuse on the Triforium gallery in Westminster Abbey (above and below)





The opening in the wall of the Triforium gallery to allow for the entrance bridge from the new tower



The new tower under construction seen from inside the Triforium gallery





A model of the new tower within the Poets' Yard between the south elevation of the Abbey and the Chapter House (above and below)



### 3.5.3 Recommendations on the Restoration of Buildings within the World Heritage Property

Recommendation 19: As more detailed plans are developed for the Restoration and Renewal project for Westminster Palace, the State Party should keep the World Heritage Centre and Advisory Bodies informed as soon as possible, particularly in regard to demolitions or new constructions, but also to any other significant works that may impact on the OUV of the property. This early notice will avoid any misunderstandings as the work progresses.

Recommendation 20: The Restoration and Renewal project offers the Westminster team an opportunity to reconsider the temporary structures for entertaining along the riverside façade of the palace. Any eventual hospitality structures on that important view should take into account the visual impacts from the Lambeth side of the river and should in no way have a negative impact on OUV.

Recommendation 21: The mission team regrets that the work on the Triforium project was carried out without an HIA and without informing the World Heritage Centre prior to commencement of the project. While it does not appear that this addition will have a negative impact on the OUV of the property, it is recommended that any future work be subject to HIA and information being provided. In the meantime, the mission recommends that full information on the existing project be sent to the World Heritage Centre as well as a final report of the works once they have been completed to ensure that there has been no negative impact on the OUV.

## 3.6 Linking the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property to its Larger Context in London and the United Kingdom

### 3.6.1 The Four World Heritage Properties in Greater London

The Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property is one of four World Heritage properties in the Greater London area. The other three are the Tower of London, Maritime Greenwich, and Royal Botanic Gardens, Kew. In a fast developing, international city such as London, it can be imagined that these four properties will face many of the same challenges.

These four properties are situated in different boroughs. Boroughs as self-government units, have administrative power only in their own territory while both positive and negative impacts of development can often arrive from outside in the territory of adjoining boroughs or even farther away. It can be argued that in spite of the diverse character and different historic background of their components, the boroughs together form only one, visually and functionally inseparable urban entity, Greater London. In this context the responsibility of preservation and management of the four World Heritage properties must on the one hand be assured by the individual boroughs where they are located, but on the other hand by working together with adjoining boroughs and even at the level of London as a whole.

For this reason, the Mission Team considers that it would be very useful for the four properties to explore possible synergies and establish mechanisms for networking and cooperation in the management and conservation of the four World Heritage properties. In this way, common problems can be discussed, and innovative solutions can be shared. This "joint committee" or other mechanism would most likely work effectively under the coordination of the GLA (as the "lowest relevant level") and should include all boroughs who have a stake in the protection of the World Heritage properties. If effective, this type of arrangement might serve as a model for other States Parties to the Convention.

### 3.6.2 World Heritage Properties in the United Kingdom

In a similar way that the four World Heritage properties in London may have similar problems among them, there are also similar issues with other World Heritage properties in the United Kingdom. Tall buildings and other development pressures are certainly affecting properties in Liverpool and Cornwall, just to name a few. With this in mind, it may be useful for the government at the national level to create a network of sites which would allow for exchange of information, and the development of innovative solutions to common problems.

This solution could also help to avoid a mismatch between the timeframe for development approvals at the national level, and the need to sometimes pass proposals through the World Heritage Committee and its Advisory Bodies for advice and recommendations. The State Party sometimes approves proposals, despite concerns expressed by the World Heritage Committee. The State Party has on occasion informed the Committee that there is nothing that can be done to change a proposal, since it has already been approved. The Committee and Advisory Bodies are somewhat constrained by the cycle of meetings, while the State Party is constrained by its rules and regulations for consenting to development proposals – the ability of local authorities to grant lawful approvals for projects which adversely affect OUV – although in the case of Government projects the State Party, or its agencies, may be in a position to control when applications are made or exhibited and statutory timeframes commence.

### 3.6.3 Recommendations on Linking the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property to its Larger Context in London and the United Kingdom

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

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

## **4 CONCLUSIONS AND RECOMMENDATIONS**

### **4.1 General Findings**

The World Heritage property of Palace of Westminster and Westminster Abbey including Saint Margaret's Church is one of the most important and recognizable monuments in London, and is a World Heritage Property with Outstanding Universal Value. After examining the situation on the ground, and carrying out discussions with stakeholders from all levels of government, the Mission finds that the World Heritage property is vulnerable to incremental changes, in particular to its setting, and is currently facing threats from the effects of development projects. These threats come mainly from the potential to diminish the important visual qualities of the property, including views both to and from the site. In the case of Elizabeth House, the Shell Centre, and the Nine Elms project, the World Heritage Committee has already expressed concern as to the negative impacts on the OUV of the property. As these projects are in construction, the Mission can confirm the concerns of the Committee.

There is also, however, concern about the decision-making process for future development requests. The fact that these projects received consent and were allowed to be built shows that despite the numerous policies that are in place at the national, city-wide, and borough levels, there is a disconnect between the good intentions of the policies and the buildings that are being constructed which negatively impact on the OUV of the property.

At a more general level, there is a need for the State Party to ensure that mechanisms are in place to reinforce the protection of OUV in the planning and decision-making process. The Mission, therefore, recommends that planning policies be reconsidered to provide a clearer, more concrete guidance for developers and decision-makers, and that the notion of balance between protection of OUV and the other benefits of the development projects be much more weighted towards the requirement to protect OUV, in keeping with the letter and spirit of the World Heritage Convention. New tools such as the 3D modelling and analysis tools discussed during the mission are considered positive and should allow for judgements not just of individual projects, but also cumulative effects of many planned or proposed projects.

The Mission also considers that the State Party should reconsider the role of Historic England and the advice that it provides when making decisions on development projects. Historic England has a long knowledge and working relationship with the implementation of the World Heritage Convention, and as the national heritage advisor, is best placed to be able to provide balanced and useful advice in regard to decisions that have a potential to affect OUV. The Mission also suggests that the State Party should consider calling in all planning applications that may have impact on the OUV of the property, especially in the event that Historic England has advised on such a possible impact.

In regard to site management, the Mission Team recommends that the new Management Plan be completed as soon as possible, and that the Steering Committee with an active participation of the Greater London Authority be strengthened to ensure more effective implementation. Care should also be taken to ensure that any planned developments within the site or its immediate surroundings, including road closures, new buildings or infrastructure, new visitor facilities, and the proposed Holocaust Memorial, should be carefully evaluated to ensure that they do not negatively affect the OUV of the property.

The State of Conservation of the buildings themselves appears to be in the hands of very qualified conservation professionals. Nevertheless, given the large scale of the proposed Restoration and Renewal project for the Palace of Westminster, the State Party should keep the World Heritage Committee informed as the plans develop, in accordance with the Operational Guidelines to the World Heritage Convention. This was unfortunately not done

before construction began on the access tower for the new Triforium museum at Westminster Abbey. The mission, therefore, recommends that the State Party make additional efforts to keep the World Heritage Committee informed of any planned significant changes to the property.

The State Party should consider establishing links between the site management teams of each of the four London World Heritage properties. Such a link would enhance the possibility for communication and finding innovative solutions to common problems. This is also true for the World Heritage properties in the United Kingdom as a whole. A stronger network of World Heritage properties would provide benefits for all.

The Mission team notes that if the concerns expressed in chapter 3 of this document are not addressed effectively, and if the process for consent for development projects is not modified to take a stronger consideration of the Outstanding Universal Value of the property, it will likely lead to a continued deterioration of the setting of the property, and may lead to the need to consider placing the property on the World Heritage List in Danger.

## **4.2 Recommendations**

The Reactive Monitoring Mission carried out by representatives of ICOMOS and ICCROM, from 21 – 23 February 2017, came to the following more specific recommendations after review of the documents provided as well as on-site visits and meetings with stakeholders.

### **4.2.1 Recommendations on Issues at a General Level**

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

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

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

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

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

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

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

#### 4.2.2 Recommendations on Site Management

Recommendation 8: The new management plan for the World Heritage property, which is in preparation, should be finalized as soon as possible by the Westminster City Council, in cooperation with the other members of the Steering Group. This management plan should consider management and decision-making issues within the World Heritage property and its setting. It should also include disaster risk management at the property and in each of the buildings of the property. The plan should contain clear actions for its implementation taking into account all members of the Steering Group and should assign responsibilities as well as indicators for implementation to allow for an evaluation of its implementation over time.

Recommendation 9: The Steering Group should be revitalized, with regular meetings and a more action oriented perspective in regard to overseeing the implementation of the Management Plan. The Greater London Authority should also take a more active role in the Steering Group (perhaps becoming a co-chair) to bridge differences amongst the boroughs.

#### 4.2.3 Recommendations on Urban Planning and Development Projects with an Emphasis on Tall Buildings

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

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#### 4.2.4 Recommendations on Urban Planning Issues Westminster

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

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

Recommendation 18: The State Party may wish to reconsider the establishment of a buffer zone around the World Heritage property. While not able to deal with issues related to the larger setting, a buffer zone could be a useful tool to inform future development and design of any new elements in the vicinity of the World Heritage property.

#### 4.2.5 Recommendations on the Restoration of Buildings within the World Heritage Property

Recommendation 19: As more detailed plans are developed for the Restoration and Renewal project for Westminster Palace, the State Party should keep the World Heritage Centre and Advisory Bodies informed as soon as possible, particularly in regard to demolitions or new constructions, but also to any other significant works that may impact on the OUV of the property. This early notice will avoid any misunderstandings as the work progresses.

Recommendation 20: The Restoration and Renewal project offers the Westminster team an opportunity to reconsider the temporary structures for entertaining along the riverside façade of the palace. Any eventual hospitality structures on that important view should take into account the visual impacts from the Lambeth side of the river and should in no way have a negative impact on OUV.

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

on the existing project be sent to the World Heritage Centre as well as a final report of the works once they have been completed to ensure that there has been no negative impact on the OUV.

#### 4.2.6 Recommendations on Linking the Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Property to its Larger Context in London and the United Kingdom

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

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



## 5 ANNEXES



Annex I	Statement of Outstanding Universal Value (OUV)
Annex II	Itinerary of the Mission
Annex III	Terms of Reference of the Mission
Annex IV	Mission Team and Persons Met During the Mission
Annex V	Maps and Plans
Annex VI	Decisions of the World Heritage Committee Regarding the Property



## **Annex I      Statement of OUV**

### **Brief synthesis**

The Palace of Westminster, Westminster Abbey and St Margaret's Church lie next to the River Thames in the heart of London. With their intricate silhouettes, they have symbolised monarchy, religion and power since Edward the Confessor built his palace and church on Thorney Island in the 11th century AD. Changing through the centuries together, they represent the journey from a feudal society to a modern democracy and show the intertwined history of church, monarchy and state.

The Palace of Westminster, Westminster Abbey and St Margaret's Church continue in their original functions and play a pivotal role in society and government, with the Abbey being the place where monarchs are crowned, married and buried. It is also a focus for national memorials of those who have served their country, whether prominent individuals or representatives, such as the tomb of the Unknown Warrior. The Abbey, a place of worship for over 1000 years, maintains the daily cycle of worship as well as being the church where major national celebrations and cultural events are held. The Palace of Westminster continues to be the seat of Parliament.

Westminster School can trace its origins back to 1178 and was re-founded by Queen Elizabeth I in 1560. It is located around Little Dean's Yard.

The iconic silhouette of the ensemble is an intrinsic part of its identity, which is recognised internationally with the sound of "Big Ben" being broadcast regularly around the world. The Palace of Westminster, Westminster Abbey, and St Margaret's Church together encapsulate the history of one of the most ancient parliamentary monarchies of present times and the growth of parliamentary and constitutional institutions.

In tangible form, Westminster Abbey is a striking example of the successive phases of English Gothic art and architecture and the inspiration for the work of Charles Barry and Augustus Welby Pugin on the Palace of Westminster.

The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed through English architectural references to show the national character.

The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style. Westminster Hall is a key monument of the Perpendicular style and its admirable oak roof is one of the greatest achievements of medieval construction in wood. Westminster is a place in which great historical events have taken place that shaped the English and British nations.

The church of St Margaret, a charming perpendicular style construction, continues to be the parish church of the Palace of Westminster and has been the place of worship of the Speaker and the House of Commons since 1614 and is an integral part of the complex.

**Criterion (i):** Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.

**Criterion (ii):** Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin in Westminster Palace, in the "Gothic Revival" of the 19th century.

**Criterion (iv):** The Abbey, the Palace, and St Margaret's illustrate in a concrete way the specificities of parliamentary monarchy over a period of time as long as nine centuries. Whether one looks at the royal tombs, the Chapter House, the remarkable vastness of Westminster Hall, of the House of Lords, or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

### **Integrity**

The property contains the key attributes necessary to convey its Outstanding Universal Value. In 2008 a minor boundary modification was approved to join the existing component parts of the property into a single ensemble, by including the portion of the road which separated them. There are associated attributes outside the boundary, which could be considered for inclusion in the future, and this will be examined during the next Management Plan review.

The instantly recognisable location and setting of the property in the centre of London, next to the River Thames, are an essential part of the property's importance. This place has been a centre of government and religion since the days of King Edward the Confessor in the 11th century and its historical importance is emphasised by the buildings' size and dominance. Their intricate architectural form can be appreciated against the sky and make a unique contribution to the London skyline.

The distinctive skyline is still prominent and recognisable despite the presence of a few tall buildings as part of the property. The most prominent of these, Milbank Tower and to some extent Centre Point - now protected in their own right - were both extant at the time of inscription. However important views of the property are vulnerable to development projects for tall buildings. Discussions have begun and are ongoing on how to ensure that the skyline of the property and its overall prominence is sustained, and key views into, within and out of the property are conserved. The main challenge is agreeing on a mechanism to define and give protection to its wider setting. Until agreement can be reached on this, the integrity of the site is under threat.

The buildings are all in their original use and are well maintained to a high standard. There has been little change to the buildings since the time of inscription although external repairs continue and security measures have been installed at the Palace of Westminster. The heavy volume of traffic in the roads around the property does impact adversely on its internal coherence and on its integrity as a single entity.

### **Authenticity**

The power and dominance of state religion, monarchy and the parliamentary system is represented tangibly by the location of the buildings in the heart of London next to the River Thames, by the size of the buildings, their intricate architectural design and embellishment and the high quality materials used. The Palace of Westminster, the clock tower and "Big Ben's" distinctive sound have become internationally recognised symbols of Britain and democracy. All the buildings maintain high authenticity in their materials and substance as well as in their form and design.

The property maintains its principal historic uses and functions effectively. The Gothic Westminster Abbey, a working church, continues to be used as a place of daily worship. It remains the Coronation church of the nation and there are frequent services to mark significant national events as well as royal weddings and funerals and for great national services. Many great British writers, artists, politicians and scientists are buried or memorialised here. The Palace of Westminster continues to be used as the seat of the United Kingdom's two-chamber

system of democracy. St Margaret's Church, now part of Westminster Abbey, remains at heart a medieval parish church, ministering to Members of both Houses of Parliament.

### **Protection and management requirements**

The United Kingdom Government protects World Heritage properties in England in two ways. Firstly individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990, and the 1979 Ancient Monuments and Archaeological Areas Act and secondly through the United Kingdom Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected as Listed Buildings and Scheduled Ancient Monuments.

Government guidance on protecting the Historic Environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. Policies to ensure this can be found in statutory planning documents, which are reviewed and publicly consulted upon on a regular cycle.

The Mayor's London Plan provides a strategic social, economic, transport and environmental framework for London and its future development over the next 20-25 years and is reviewed regularly. It contains policies to protect and enhance the historic environment, including World Heritage properties. Further guidance is set out in London's World Heritage Sites – Guidance on Setting, and The London View Management Framework Supplementary Planning Guidance provides guidance on the protection of important designated views. It includes 10 views of the Westminster World Heritage property including a view looking from Parliament Square towards the Palace of Westminster.

The City of Westminster also has policies in its Core Strategy to protect the historic environment generally and the property specifically. Its cross cutting policies provide for management of the historic environment and protection of important views, buildings and spaces with particular reference to the Westminster World Heritage property. Although the property is located within the City of Westminster, much of its setting covers adjoining boroughs. The neighbouring Boroughs of Lambeth and Wandsworth also include policies in their Local Plans for the protection of the setting of the Westminster World Heritage property.

Both Westminster Abbey and the Palace of Westminster have Conservation Plans that put in place a comprehensive conservation maintenance regime based on regular inspection programmes. The Westminster World Heritage Site Management Plan was published by the property's Steering Group in 2007. There is no coordinator, and implementation of key objectives is undertaken by the key stakeholders – the Palace of Westminster, Westminster Abbey and Westminster City Council - working within the Steering Group framework.

There are continuing pressures for development and regeneration in the area around the property and permission has been given for tall buildings which could adversely impact on its important views. The guidance set out in the Mayor's Supplementary Planning Guidance on London's World Heritage Sites – Guidance on Setting, together with the London View Management Framework, Historic England's Conservation Principles and Seeing the History in the View identify methodologies to which could be used to assess impacts on views and on the setting of the World Heritage property and its Outstanding Universal Value. However, there is no single, specific mechanism in place to protect the setting of the property.

As one of the most famous sites in London and a key tourist attraction, the property receives high numbers of visitors who require proactive management to minimise congestion and careful visitor management to protect the fabric and setting of the property. The protection and enhancement of the public realm and better traffic management, particularly in the quiet spaces



adjacent to the property, are also important in protecting its setting. To address these issues, an overall visitor management strategy and a traffic management strategy are needed to complement the visitor management strategies of the individual stakeholders, together with greater protection of the setting of the property and its key views. Ways in which this can be achieved will be examined in the Management Plan reviews. in the future...

## Annex II Itinerary of the Mission

### ICOMOS/ICCROM Joint Reactive Monitoring Mission to “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church” World Heritage Site-Proposed amended version Itinerary

#### 20 February – Arrival

Time	Activity	Venue/Host	Lead	Attending
00.00	ICOMOS (M. Tamás Fejérdy) (ICCROM (M. Joseph King) Mission arrives			
00.00	Transfer to hotel	Hotel Nadler Victoria, 10 Palace Place		

#### 21 February Day 1 – Context, Policy Framework and Setting

Time	Activity	Venue/Host	Lead	Attending
09.00	Coffee and welcome to Westminster from Robert Davis	WCC (Lord Mayor’s Parlour)	WCC	DCMS, HE, GLA, WCC, Lord Mayor, other LBs, Palace of Westminster
9.30	Introductory Session to Westminster WHS Planning Framework and Management Plan	WCC	HE (National policy presentation: 20 mins) GLA (London Plan policy presentation: 40 mins) WCC (Presentation on local context, policy and management plan review: 45 mins) Questions and discussion: 15 mins	DCMS, HE, GLA, WCC, other LBs
11.30	Coffee break	WCC	WCC	DCMS, HE, GLA, WCC, other LBs
11.45	Tour of Parliament Square, Victoria Tower Gardens and across Lambeth Bridge (viewpoints, development, setting)		WCC/HE	DCMS, HE, WCC, GLA, others LBs?
13:45	London Eye			DCMS, HE, GLA, WCC, other LBs
14:30	Taxis to GLA			
14:45	Sandwich lunch at GLA	GLA	GLA	DCMS, HE, GLA, WCC,

				other LBs, Deputy Mayor
15:30	WHS setting and overview of sites with the potential to affect the setting of Westminster WHS	GLA	Presentations (30 mins each) by Lambeth/Southwark/Wandsworth, followed by questions and discussion.	DCMS/HE/GLA/WCC/other LBs
17:00	Meeting with Mayor of London*	GLA	GLA	
18:00	Drinks	Royal Festival Hall terrace (view of WHS)		HE CE, LB Senior Members?, Deputy Mayor?
19:00	Close			

\*subject to diary availability

## 22 February Day 2 – Conservation works to fabric of WHS and Immediate Setting

Time	Activity	Venue/Host	Lead	Attending
09:00	Introductory session to Palace of Westminster R&R and works in immediate setting	Palace of Westminster	Palace of Westminster	DCMS/HE/WCC
10:00	Guided visit of conservation works to Palace of Westminster	Palace of Westminster	Palace of Westminster	DCMS/HE/WCC
12:30	Lunch at Palace of Westminster	Palace of Westminster	<i>tbc</i>	DCMS/WCC/HE/HE CE
14:00	Introductory session to Westminster Abbey Triforium project	Surveyor of the Fabric	Westminster Abbey/ Surveyor of the Fabric	DCMS/HE/WCC
15:00	Guided visit of Triforium project and other conservation works	Surveyor of the Fabric	Westminster Abbey/ Surveyor of the Fabric	DCMS/HE/WCC
16:30	Holocaust Memorial		WCC/HE	DCMS/HE/WCC/UNITED KINGDOM Holocaust Memorial Foundation
18:00	Free time for private meeting/dinner			

**23 February Day 3 – Ministerial meetings and wash-up**

Time	Activity	Venue/Host	Lead	Attending
09:00	Meeting with HE chief exec	DCMS	HE	HE/HE Dep CE/DCMS
09:45	Wash-up session	DCMS	HE	HE/DCMS/WCC/GLA/other LBs
11:00	Meeting with Heritage Minister*	DCMS	DCMS	DCMS
11:45	Meeting with Planning Minister*	DCLG	DCMS	DCMS?
12:30	Lunch			
13:00	Closed session for experts	WCC**		
15:00	Mission departs			

\*depends on Ministerial availability

\*\*will just need a room for the experts

**Participants**

DCMS – Hannah Jones, Keith Nichol, Minister for Heritage Tracey Crouch MP

HE – Henry Owen John, Emily Gee, Paddy Elson, David English, Graham Saunders, Duncan Wilson

GLA (TfL) – Rt Hon Sadiq Khan/Jules Pipe, Elliot Kemp, Jennifer Peters, Colin Wilson

WCC – Cllr Davis, John Walker, Jane Hamilton, Robert Ayton, Ed Watson

LB Lambeth – Doug Black

LB Wandsworth – Barry Sellers

LB Southwark – Michael Tsoukaris

Palace of Westminster – Director/Head of Estates, Adam Watrobski

Cabinet Office – UK Holocaust Memorial Foundation

Westminster Abbey – Receiver General, Ptolemy Dean (Surveyor of the Fabric)



## **Annex III      Terms of Reference of the Mission**

### **TERMS OF REFERENCE<sup>2</sup>**

ICOMOS/ICCROM Reactive Monitoring Mission to the World Heritage property  
 “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church” (United Kingdom of Great Britain and Northern Ireland) (C 426bis)  
 21-23 February 2017

Based on Decision 39 COM 7B.87 (see Annex I) of the World Heritage Committee, concerning the state of conservation of the World Heritage property “Palace of Westminster and Westminster Abbey including Saint Margaret’s Church”, inscribed on the World Heritage List in 1987, and taking into consideration the Operational Guidelines for the Implementation of the World Heritage Convention and the State Party report dated December 2016, the mission shall:

1. Assess the overall state of conservation of the property, including factors and conservation issues that could impact on its Outstanding Universal Value (OUV), including conditions of authenticity and integrity and the cumulative impact of developments which have been approved or are currently under construction.
2. Assess the urban planning and development framework and the long term development strategy of London, including the potential implications of the current review of the London Plan and the Central Activities Zone Supplementary Planning Guidance Identify potential courses of action to address ways of strengthening the management and protection of the physical attributes of OUV, the context and setting of the World Heritage property within the urban development framework (Knowledge and planning tools, Regulatory systems and decision making tools, Civic engagement tools, Financial tools). Assess how to strengthen or develop guidelines to identify and secure appropriate view cones. Assess the strength and weaknesses of the current buffer zone.
3. Assess the current roles and relationships of the key actors involved in planning and development decisions which affect the property, including, but not limited to Westminster City Council, Lambeth Council and other local government agencies, Historic England, the Heritage Team of the Department for Culture, Media and Sport, the Secretary of State, and developers. Consider and assess options available to ensure that the advice of Historic England, the World Heritage Committee and its advisory bodies is given proper weight and receives consideration at the appropriate stage of the planning and consent process, so that impacts on the OUV of the property (and other inscribed properties within London) can be minimised or avoided.
4. Assess progress and identify potential courses of action to address ways of strengthening the protection and management mechanisms of the property, to establish or strengthen the appropriate partnerships and local management frameworks for conservation and development, as well as to develop mechanisms for

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<sup>2</sup> Drafted by WHC reviewed by ICOMOS and ICCROM

the coordination of the various activities between different actors, both public and private including governance and decision making structures between local and national authorities.

5. Assess progress with finalisation of the Management Plan for the property and identify any matters within the revised Management Plan which might benefit from further consideration or elaboration.
6. Assess progress on the development of the upcoming major conservation works planned for the Palace of Westminster.
7. The mission will take place from 21-23 February 2017. Based on the results of the above-mentioned assessments and the on-site discussions with the State Party representatives, the reactive monitoring mission team shall prepare a report on the findings including recommendations to the State Party. ICOMOS/ICCROM shall submit the report to the World Heritage Centre within eight weeks after the mission.

**Annex 1 to the Terms of Reference:** See the last Decision in the ANNEX VI

#### **COMPOSITION OF MISSION TEAM**

ICOMOS/ICCROM Reactive Monitoring Mission to the World Heritage property  
"Palace of Westminster and Westminster Abbey including Saint Margaret's Church" (United Kingdom of Great Britain and Northern Ireland) (C 426bis)  
21-23 February 2017

**Joseph KING, ICCROM**

**Tamás FEJÉRDY, ICOMOS**

## Annex IV Mission Team and Persons Met During the Mission

(Correction: the participant from Lambeth Council should read Doug Black)

### Westminster World Heritage Site: ICOMOS/ICCROM Reactive Monitoring Mission 21-23 February 2017

#### Participant List

Mission experts:

- Tamás Fejérdy (ICOMOS)
- Joseph King (ICCROM)

#### Tuesday 21<sup>st</sup> February

**09:00 – Welcome and Introductory Session to Westminster WHS Planning Framework and Management Plan**

**Location: Westminster City Council, 64 Victoria Street**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
	David English	Historic Places Advisor
<b>Greater London Authority</b>	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
<b>Westminster City Council</b>	Cllr Steve Summers	Lord Mayor of Westminster
	Cllr Robert Davis	Deputy Leader and Cabinet Members for Business, Culture and Heritage
	Cllr Nickie Aikin	Leader of Westminster City Council
	Ed Watson	Executive Director, Growth, Planning and Housing
	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	Barry Smith	Head of City Policy and Strategy
	David Clegg	Head of Design – South Area Planning Team
	Robert Ayton	Head of Design – Central Area Planning Team
<b>Lambeth Council</b>	Doug Elliot	Interim Assistant Director of Planning
<b>Southwark Council</b>	Michael Tsoukaris	Group Manager Design and Conservation
<b>Wandsworth Council</b>	Barry Sellers	Conservation and Design Officer
<b>Palace of Westminster</b>	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
<b>Westminster Abbey</b>	Ptolemy Dean	Surveyor of the Fabric
<b>Miller Hare Limited</b>	John Hare	Director



**11:45 - Walking tour of Parliament Square, Victoria Tower Gardens and across Lambeth Bridge  
(viewpoints, development, setting)**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
<b>Greater London Authority</b>	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
<b>Westminster City Council</b>	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	David Clegg	Head of Design – South Area Planning Team
	Robert Ayton	Head of Design – Central Area Planning Team
<b>Lambeth Council</b>	Doug Elliot	Interim Assistant Director of Planning
<b>Southwark Council</b>	Michael Tsoukaris	Group Manager Design and Conservation
<b>Wandsworth Council</b>	Barry Sellers	Conservation and Design Officer
<b>Palace of Westminster</b>	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
<b>Miller Hare Limited</b>	John Hare	Director

**13:45 - London Eye**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
<b>Greater London Authority</b>	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
<b>Westminster City Council</b>	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	David Clegg	Head of Design – South Area Planning Team
	Robert Ayton	Head of Design – Central Area Planning Team
<b>Lambeth Council</b>	Doug Elliot	Interim Assistant Director of Planning
<b>Southwark Council</b>	Michael Tsoukaris	Group Manager Design and Conservation
<b>Wandsworth Council</b>	Barry Sellers	Conservation and Design Officer

**14:45 - Sandwich lunch (to continue after 15-minute meeting with the Mayor)****Location: GLA offices, Room 4.6W, City Hall**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
<b>Greater London Authority</b>	Jules Pipe	Deputy Mayor of London
	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
<b>Westminster City Council</b>	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	Robert Ayton	Head of Design – Central Area Planning Team
<b>Lambeth Council</b>	Doug Elliot	Interim Assistant Director of Planning
<b>Southwark Council</b>	Michael Tsoukaris	Group Manager Design and Conservation
<b>Wandsworth Council</b>	Barry Sellers	Conservation and Design Officer

**15:00 - Meeting with Mayor of London****Location: GLA offices, City Hall**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Greater London Authority</b>	Sadiq Khan	Mayor of London
	Jules Pipe	Deputy Mayor of London
	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
	Nick Bowes	Mayoral Director, Policy
	Patrick Hennessy	Mayoral Director, Communications



**15:30 - WHS setting and overview of sites with the potential to affect the setting of Westminster WHS**

**Location: GLA offices, Committee Room 1, City Hall**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
<b>Greater London Authority</b>	Jules Pipe	Deputy Mayor of London
	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
	Jennifer Peters	Strategic Planning Manager
<b>Westminster City Council</b>	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	Robert Ayton	Head of Design – Central Area Planning Team
<b>Lambeth Council</b>	Doug Elliot	Interim Assistant Director of Planning
<b>Southwark Council</b>	Michael Tsoukaris	Group Manager Design and Conservation
<b>Wandsworth Council</b>	Barry Sellers	Conservation and Design Officer

**18:00 - Drinks, Royal Festival Hall**

**Location: Sunley Pavillion, Royal Festival Hall**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Duncan Wilson	Chief Executive
	Emily Gee	London Planning Director
	Henry Owen-John	Head of International Advice
	Graham Saunders	Principal Adviser Historic Environment Planning
<b>Greater London Authority</b>	David English	Historic Places Advisor
	Jules Pipe	Deputy Mayor of London
	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
<b>London Assembly</b>	Jennifer Peters	Strategic Planning Manager
	Tony Devenish	Chair of London Assembly Planning Committee
	Nicky Gavron	Deputy Chair of London Assembly Planning Committee
<b>Westminster City Council</b>	Cllr Richard Beddoe	Chairman of Planning
	Ed Watson	Executive Director, Growth, Planning and Housing
	John Walker	Director of Planning
	Mike Chatten	Head of South Area Planning Team



<b>Lambeth Council</b>	Cllr Lib Peck	Leader
	Cllr Clare Wilcox	Chair of Planning Applications Committee
	Cllr Nigel Haselden	Heritage Champion
	Sue Foster	Strategic Director: Neighbourhoods and Growth
	Doug Black	Interim Assistant Director of Planning
<b>Wandsworth Council</b>	Cllr Sarah McDermott	Chair of Planning Applications Committee
	Barry Sellers	Conservation and Design Officer
<b>ICOMOS-UK</b>	Juliet West	Member





**Wednesday 22<sup>nd</sup> February**

**09:00 - Introductory session to Palace of Westminster R&R and works in immediate setting, followed by guided visit of conservation works to Palace of Westminster**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director
	Paddy Elson	Inspector of Historic Buildings and Areas
	David English	Historic Places Advisor
<b>Palace of Westminster</b>	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
	Tom Healey	Programme Director, Restoration and Renewal
<b>Westminster City Council</b>	John Walker	Director of Planning
	Jane Hamilton	Principal Development Planning Officer
	David Clegg	Head of Design – South Area Planning Team
	Mike Chatten	Head of South Area Planning Team

**12:30 - Lunch at Palace of Westminster**

**Location: Strangers' Dining Room, Houses of Parliament**

Organisation	Name	Job title
<b>DCMS</b>	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
<b>Historic England</b>	Duncan Wilson	Chief Executive
	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director
	Paddy Elson	Inspector of Historic Buildings and Areas
	David English	Historic Places Advisor
<b>Palace of Westminster</b>	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
	Tom Healey	Programme Director, Restoration and Renewal
<b>Westminster City Council</b>	John Walker	Director of Planning
	David Clegg	Head of Design – South Area Planning Team
	Mike Chatten	Head of South Area Planning Team

**14:00 - Introductory session to Westminster Abbey triforium project, followed by guided visit of triforium project and other conservation works**

**Location: Westminster Abbey**

Organisation	Name	Job title
DCMS	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
Historic England	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director
	David English	Historic Places Advisor
	Jane Sidell	Inspector of Ancient Monuments
Westminster Abbey	Ptolemy Dean	Surveyor of the Fabric
	Dr Tony Trowels	Keeper of the Abbey Collection
	Susan Jenkins	Curator
Palace of Westminster	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
Westminster City Council	Clr Robert Davis	Deputy Leader and Cabinet Members for Business, Culture and Heritage
	John Walker	Director of Planning
	Mike Chatten	Head of South Area Planning Team

**16:30 - Holocaust Memorial scheme presentation**

**Location: Norman Shaw North building, Parliamentary Estate**

Organisation	Name	Job title
DCMS	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
Historic England	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director
	David English	Historic Places Advisor
	Andrew Morris	UKHMF Secretariat, Cabinet Office
Holocaust Memorial Foundation	Nathalie Tamam	UKHMF Secretariat, Cabinet Office
	Andy Bramwell	UKHMF Project Director, Cabinet Office
	Peter Freeman	UKHMF Board member
Palace of Westminster	Adam Watrobski	Head of Architecture and Heritage
	Tessa Blundy	Deputy Head of Architecture and Heritage
Westminster City Council	John Walker	Director of Planning
	Mike Chatten	Head of South Area Planning Team
	Jane Hamilton	Principal Development Planning Officer
	David Clegg	Head of Design – South Area Planning Team



**Thursday 23<sup>rd</sup> February**

**09:00 - Meeting with Historic England Deputy Chief Executive**

**Location: DCMS offices, 100 Parliament Street**

Organisation	Name	Job title
DCMS	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
Historic England	Deborah Lamb	Director of Engagement/Deputy Chief Executive
	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director

**09:45 - Wash-up session**

**Location: DCMS offices, 100 Parliament Street**

Organisation	Name	Job title
DCMS	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor
Historic England	Henry Owen-John	Head of International Advice
	Emily Gee	London Planning Director
	Graham Saunders	Principal Adviser Historic Environment Planning
Greater London Authority	David English	Historic Places Advisor
	Elliot Kemp	Principal Strategic Planner
	Colin Wilson	Senior Manager Planning Decisions
Westminster City Council	Jennifer Peters	Strategic Planning Manager
	John Walker	Director of Planning
Lambeth Council	Jane Hamilton	Principal Development Planning Officer
	Doug Elliot	Interim Assistant Director of Planning
Southwark Council	Michael Tsoukaris	Group Manager Design and Conservation
Wandsworth Council	Barry Sellers	Conservation and Design Officer

**10:30 - Meeting with Heritage Minister, Tracey Crouch**

**Location: DCMS offices, 100 Parliament Street**

Organisation	Name	Job title
DCMS	Tracey Crouch	Heritage Minister
	Khobi Vallis	Private Secretary to Heritage Minister
	Keith Nichol	Head of Cultural Diplomacy
	Hannah Jones	Senior Heritage Policy Advisor

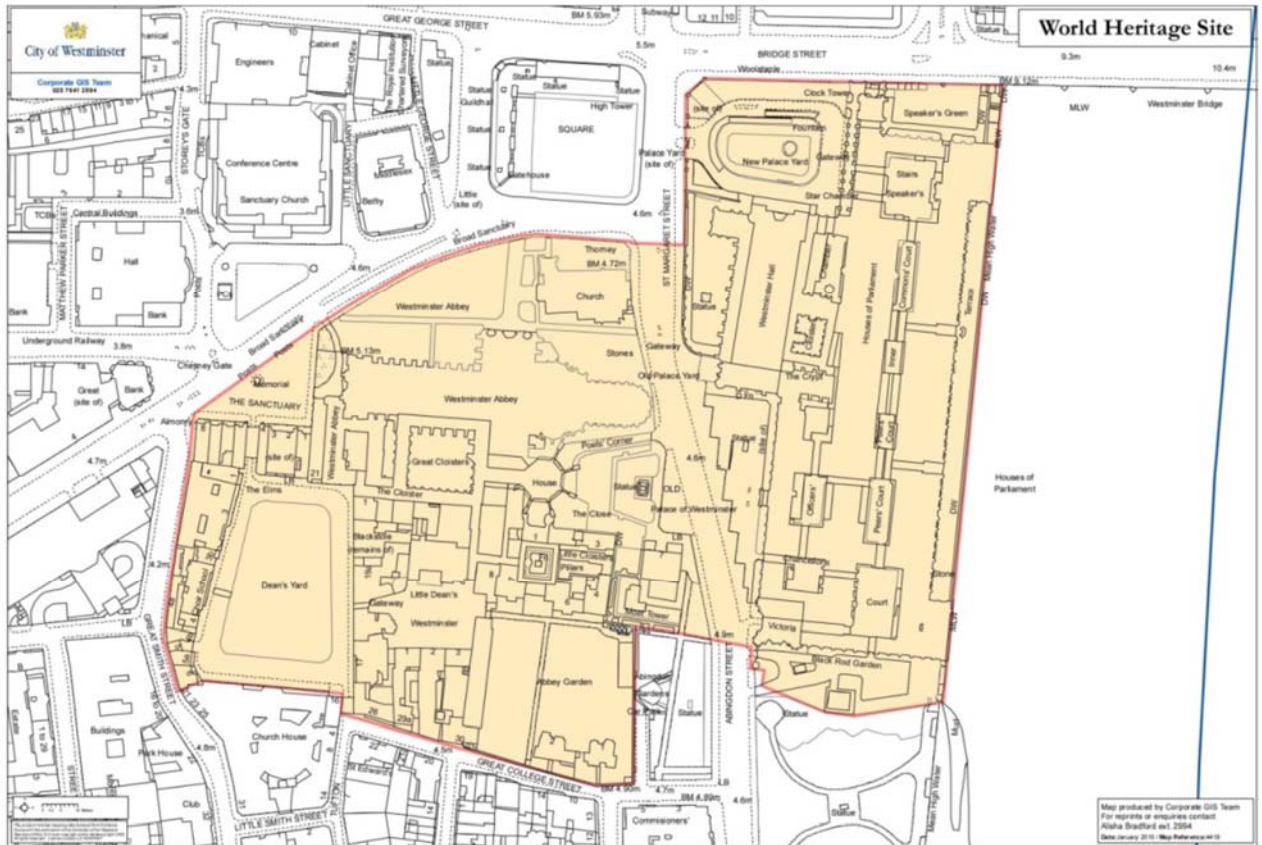
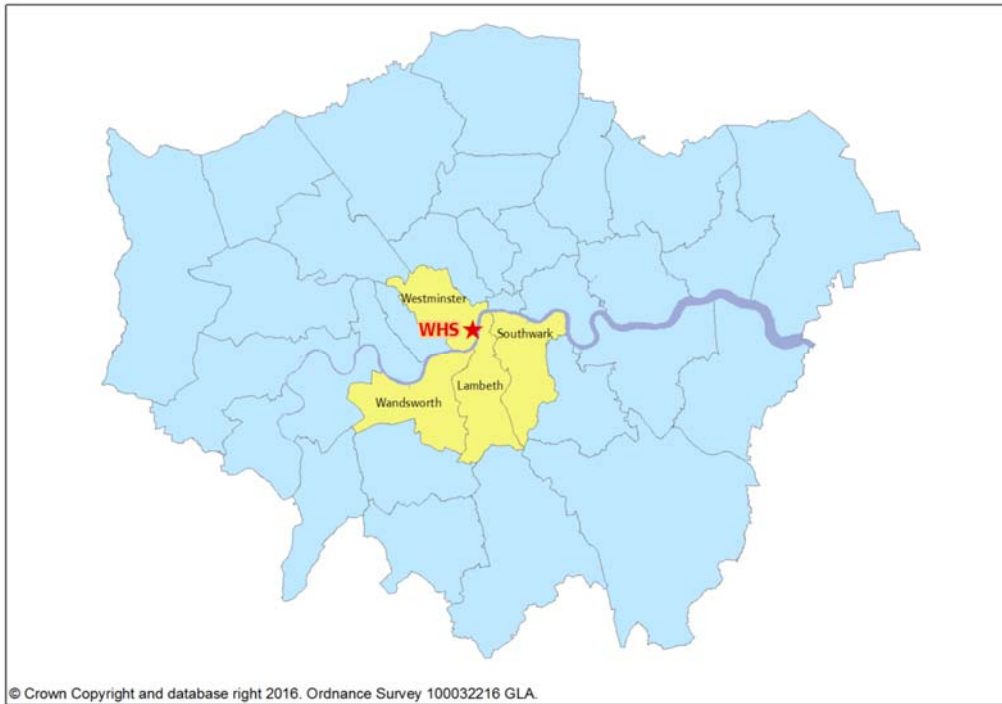
**11:30 - Formal programme to be followed by a closed session for Joseph King and Tamás Fejérdy.**

**Location: Westminster City Council offices, 64 Victoria Street (sandwich lunch to be provided)**



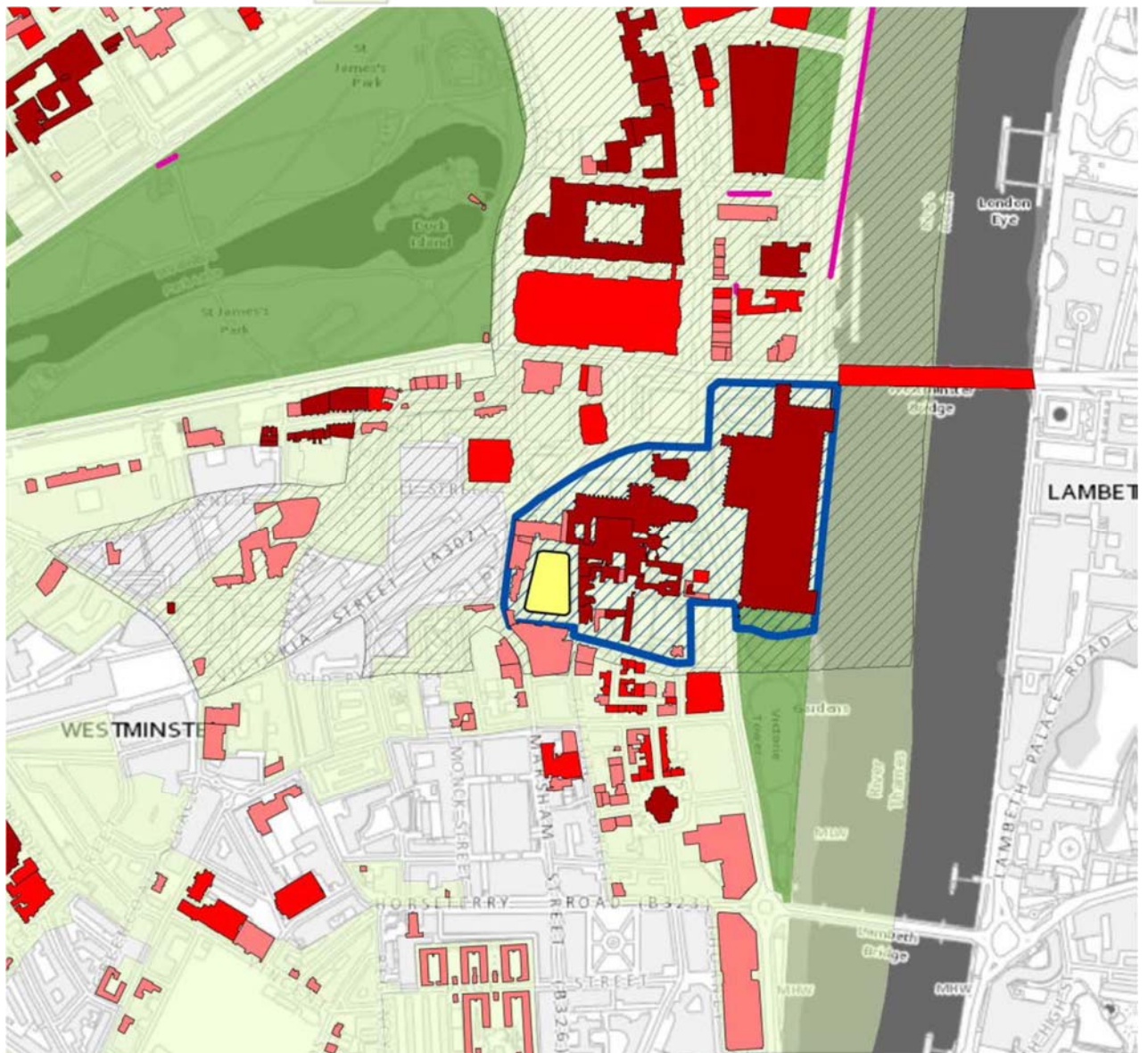
## Annex V Maps and Plans

From presentations:

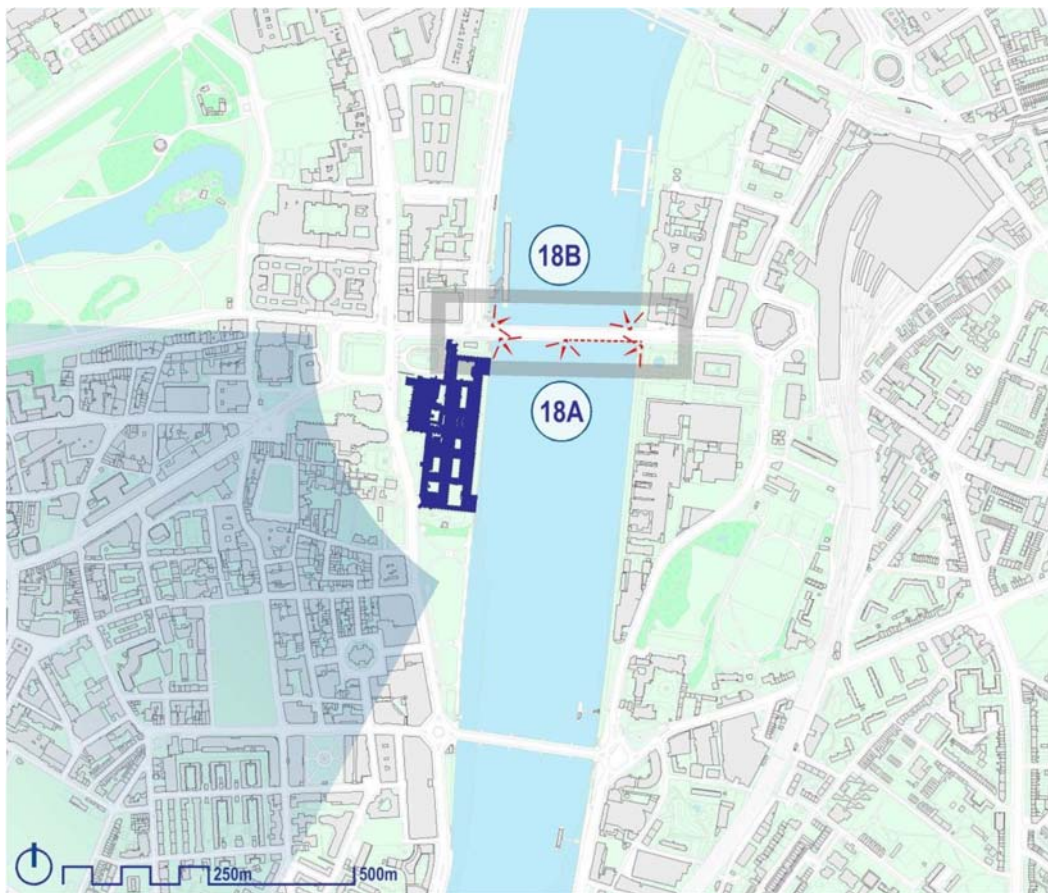
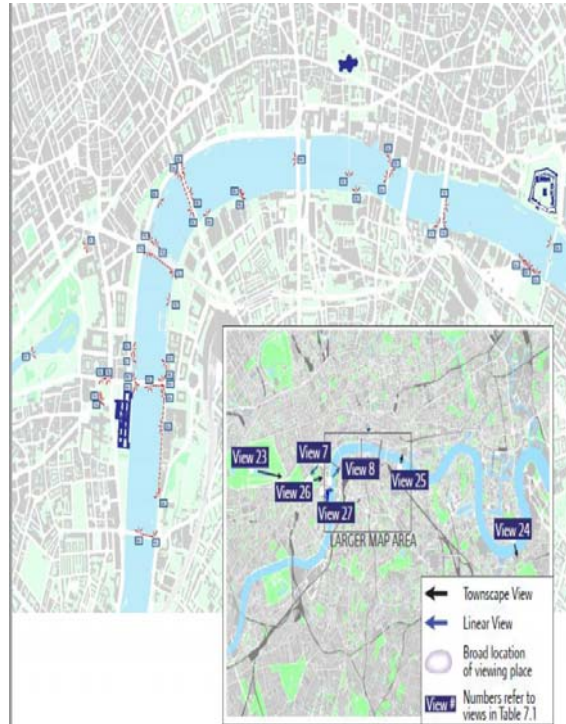


### Listed Buildings

-  I
-  II\*
-  II
-  Listed walls and gates
-  London Squares
-  World Heritage Site
-  Ludenwic and Thorney Island (Archeological Priority Area)
-  Registered Parks Gardens
-  Conservation Area

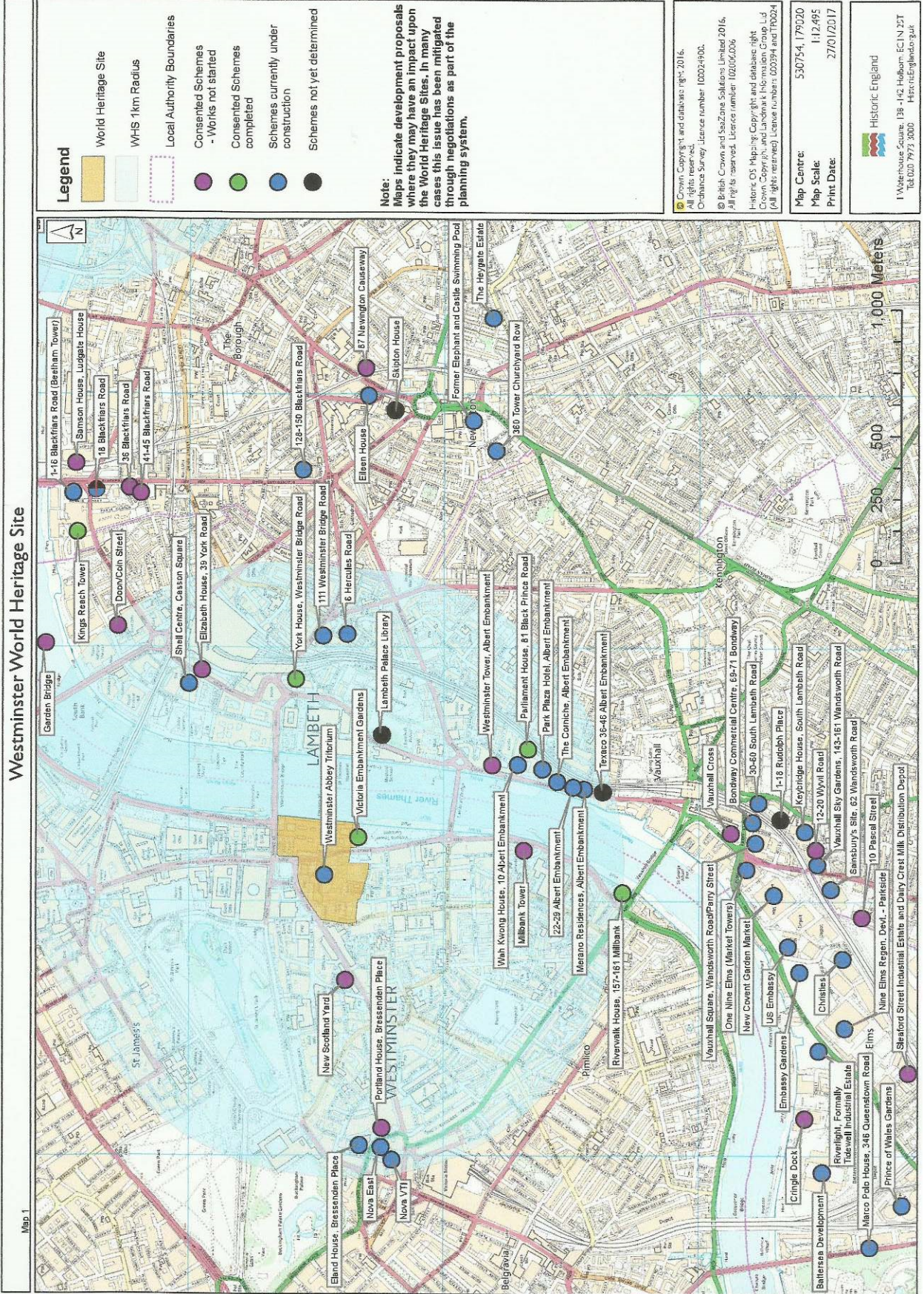






maps not to scale





Map indicating status of development proposals where they may have an impact upon the WHS (maps not to scale)



**Other relevant documents**

- **Related to the project UK Holocaust memorial:**  
<https://competitions.malcolmreading.co.uk/holocaustmemorial/>
- **Related to Historic England's policy:**  
<http://content.historicengland.org.uk/content/docs/get-involved/keep-it-london-roundtable-report.pdf>
- **Presentations**
  - **Planning and Management of Westminster World Heritage Site: Local Context – John Walker**
  - **The London Plan -**
  - **World Heritage Sites and the National Planning System in England – Henry Owen-John**
- **Documents received:**
  - **Heritage, Views and Tall Buildings – Developing Westminster's City Plan**
  - **Westminster World Heritage Site – Skyspace Analysis by "millerhare" (Draft)**
  - **City in the West – Mayor of London**
  - **City in the East – Mayor of London**
  - **Britain's Promise to Remember – The Prime Minister's Holocaust Commission Report**
  - **UK Holocaust Memorial – International Design Competition**

## **Annex VI Decisions of the World Heritage Committee Regarding the Property**

**Decision: CONF 005 VII.A – 1987**

**Inscription: Palace of Westminster, Abbey of Westminster and Saint Margaret's Church (United Kingdom)**

**Palace of Westminster, Abbey of Westminster and Saint Margaret's Church**

**426**

**United Kingdom**

**C(i)(ii)(iv)**

**Decision : 31 COM 7B.91 – 2007**

**Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom)**

The World Heritage Committee,

1. Having examined Document WHC-07/31.COM/7B,
2. Expresses its appreciation for the actions taken by the State Party in response to the Committee's earlier requests, and takes note that a London View Management Framework will come into effect on 13 July 2007, while recognizing that the visual impact study requested by the Committee has not yet been finalized;
4. Encourages the State Party to adopt the policies set out in the Heritage Protection White Paper and urges the State Party to vigorously apply the concept of clustering of tall buildings so that they do not impact adversely on the Outstanding Universal Value of London World Heritage sites and by updating the site boundaries and buffer zones;
5. Requests the State Party to prepare and present to the World Heritage Committee a dynamic visual impact study for the World Heritage property in order to facilitate thorough and rapid assessment of future planning applications;
6. Also urges the State Party to review and adjust three proposed development schemes on the South Bank of the River Thames so as to ensure the visual integrity of the World Heritage property;
7. Acknowledges that the State Party has finalized the Management Plan for the Westminster World Heritage property;
8. Requests, given the recent submission of the Management Plan and of the London View Management Framework, that the World Heritage Centre and ICOMOS review these documents to assess their effectiveness in ensuring the proper protection of the site's settings and vistas and report to the Committee at its 32nd session;
9. Takes note that the State Party has demonstrated its commitment to comply with the requests of the Committee (Decision 30 COM 7B.74) to protect the World Heritage property and its setting and related vistas;
10. Also requests the State Party to submit a progress report to the World Heritage Centre by 1 February 2008 for consideration by the World Heritage Committee at its 32nd session in 2008.

**Decision: 32 COM 8B.72 – 2008****Examination of nominations and minor modifications to the boundaries of naturel, mixed and cultural properties to the World Heritage List - Westminster Palace, Westminster Abbey and St. Margaret's Church (United Kingdom)**

The World Heritage Committee,

1. Having examined Documents WHC-08/32.COM/8B.Add and WHC-08/32.COM/INF.8B1.Add
2. **Approves the minor modification to the boundaries of the Westminster Palace, Westminster Abbey and St. Margaret's Church, United Kingdom;**
3. Recommends that a buffer zone with a view to protecting the visual integrity of the inscribed property in its environment be created, on completion of the impact studies and the coordination projects for building developments south of the Thames in London, in keeping with the expression of the Outstanding Universal Value of the Westminster site.

**Decision: 32 COM 8B.96 – 2008****Revision of Statements of Significance and Statements Outstanding Universal Value - Palace of Westminster, Westminster Abbey, and St Margaret's Church (United Kingdom)**

The World Heritage Committee,

1. Having examined Documents WHC-08/32.COM/8B.Add and WHC-08/32.COM/INF.8B1.Add,
2. Adopts the following Statement of Significance for the Palace of Westminster, Westminster Abbey, and St Margaret's Church, United Kingdom:  
 Westminster Palace, Westminster Abbey, and St Margaret's Church together encapsulate the history of one of the most ancient of parliamentary monarchies of present times and the growth of parliamentary and constitutional institutions.  
 In tangible form Westminster Abbey is a striking succession of the successive phases of English Gothic art and the inspiration of the work of Barry and Pugin on the Palace of Westminster.  
 The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed by English architectural reference to show the national character of the monument.  
 The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style.  
 Westminster Hall is a key monument of the Perpendicular style and its admirable oak roof is one of the greatest achievements of medieval construction in wood.  
 Westminster is a place in which great historical events have taken place which have shaped the English and British nation.  
 The church of St Margaret, a charming perpendicular style construction, continues to be the parish church of the House of Commons and is an integral part of the complex.  
 Criterion (i): Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.  
 Criterion (ii): Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin in Westminster Palace, in the "Gothic Revival" of the 19th century.  
 Criterion (iv): The Abbey, the Palace, and St Margaret's illustrate in a concrete way the specificities of parliamentary monarchy over a period of time as long as nine centuries. Whether one looks at the royal tombs of the Chapterhouse, the remarkable vastness

of Westminster Hall, of the House of Lords, or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

3. Recommends that assessment for statements of authenticity and integrity / statements of protection and management should be postponed to the 33rd session of the World Heritage Committee (2009) awaiting adoption of a methodology and an agreed format for Statements of Outstanding Universal Value for inscribed properties.

**Decision: 32 COM 7B.113 – 2008**

**Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom) (C 426)**

The World Heritage Committee,

1. Having examined Document WHC-08/32.COM/7B,
2. Recalling Decision 31 COM 7B.91, adopted at its 31st session (Christchurch, 2007),
3. Notes the actions of the State Party in response to the World Heritage Committee's requests in developing a management plan;
4. Thanks the State Party for aiming to develop general methodologies for assessing the impact of development on views from and to World Heritage properties, which may become a basis for further discussion on criteria for visual impact assessments;
5. Also notes progress with implementing proposals associated with the "Heritage Protection White Paper" and its subsequent "Heritage Protection Bill";
6. Regrets that the following issues still need to be addressed:
  - a) buffer zone with adequate protection,
  - b) specific skyline study of the property, its setting and views, to allow rapid in-depth assessments of the impact of development proposals in the immediate vicinity of the property,
  - c) lack of clarity on the management system set out in the management plan for addressing conflicts between conservation and development, particularly in the setting of the property;
7. Takes note that the State Party has demonstrated its commitment to comply with the requests of the World Heritage Committee (Decision 31 COM 7B.91) to protect the property, its setting and related vistas.
8. Requests the State Party to submit to the World Heritage Centre, by 1 February 2009, a progress report on the above issues, for examination by the World Heritage Committee at its 33rd session in 2009.

**Decision: 32 COM 8D – 2008**

**Clarifications of property boundaries and sizes by States Parties in response to the retrospective inventory**

The World Heritage Committee,

1. Having examined Document WHC-08/32.COM/8D,
2. Recalling Decisions 30 COM 11A.2 and 31 COM 11A.2, adopted at its 30th (Vilnius, 2006) and 31st (Christchurch, 2007) sessions respectively,
3. Recalls that, as decided at its 31st session (Christchurch, 2007) by Decision 31 COM 11A.2, the World Heritage Centre and the Advisory Bodies will not be able to examine proposals for minor or significant modifications to boundaries of World Heritage properties whenever the delimitation of such properties as inscribed is unclear;
4. Congratulates States Parties in the European Region and the States Parties of Egypt, Morocco and Tunisia on the excellent work accomplished in the clarification of the delimitation of their World Heritage properties and thanks them for their efforts to improve the credibility of the World Heritage List,



5. Takes note of the clarifications of property boundaries and sizes provided by the following States Parties in the European and Arab Regions in response to the Retrospective Inventory, as presented in the Annex of Document WHC-08/32.COM/8D:

**United Kingdom:** Durham Castle and Cathedral; Ironbridge Gorge; Stonehenge, Avebury and Associated Sites; Castles and Town Walls of King Edward in Gwynedd; **Westminster Palace, Westminster Abbey and Saint Margaret's Church;** Canterbury Cathedral, St Augustine's Abbey and St Martin's Church; Maritime Greenwich;

**Decision: 33 COM 7B.128 – 2009**

**Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom) (C 426)**

The World Heritage Committee,

1. Having examined Document WHC-09/33.COM/7B,
2. Recalling Decision 32 COM 7B.113, adopted at its 32nd session (Quebec City, 2008),
3. Notes that work was at an advanced stage on the visual impact study as requested, that "Seeing the History in View: a method for Assessing Heritage Significance within Views" is expected to be published in 2009, and that the Westminster World Heritage property Dynamic Visual Impact Study Steering Group selected five views considered to best encapsulate the Outstanding Universal Value of the property for assessment using the draft methodology set out in "Seeing the History in the View", and acknowledges that any reference to a "Skyline Study" be omitted from future Decisions;
4. Requests the State Party to ensure that:
  - a) The original intentions of the suggested "Skyline Study" are incorporated in other related work being progressed as part of the London Views Management Framework,
  - b) The review of the supplementary planning guidance, and the London Views Management Framework, fully takes into account the relevant recommendations of the November 2006 joint World Heritage Centre / ICOMOS mission,
  - c) In considering the establishment of a buffer zone in the light of discussions following on from the emerging Dynamic Visual Impact Study, further analysis of the five selected views, and as part of the broader spatial planning process, the World Heritage Centre be informed of the outcome, and the agreed and protected buffer zone be submitted for approval by the World Heritage Committee as soon as possible,
  - d) The World Heritage Centre receive copies of relevant documents as they emerge, including "Seeing the History in the View: a method for Assessing Heritage Significance within Views" due in 2009, "Metropolitan Views" draft supplementary planning guidance to be revised in 2009, as well as the revised "London Plan" to be published for public consultation in autumn 2009;
5. Also requests the State Party to submit to the World Heritage Centre by 1 February 2011, a progress report on the issues above, for examination by the World Heritage Committee at its 35th session in 2011.

**Decision: 35 COM 7B.115 – 2011**

**Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom) (C 426bis)**

The World Heritage Committee,

1. Having examined Document WHC-11/35.COM/7B,
2. Recalling Decision 33 COM 7B.128, adopted at its 33rd session (Seville, 2009),

3. Notes the intention of the State Party to address issues related to the protection of the visual integrity of the property;
4. Notes with regret that specific measures to protect the immediate and wider settings and have not yet been sufficiently developed;
5. Notes with concern that the State Party acknowledges that major developments currently being considered could have a potential impact on the property;
6. Requests the State Party to evaluate the impact of proposed changes to the visual setting of the property on its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency;
7. Also requests the State Party to refrain from approving any new development project until an adequate protection of the setting of the property is in place;
8. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to review and discuss with national and local authorities the overall situation of the property with regard to the state of conservation of the site in its urban context, how current and proposed construction projects in its neighbourhood may affect the Outstanding Universal Value of the property, and how appropriate protection for its setting may be put in place, for examination by the World Heritage Committee at its 36th session in 2012;
9. Requests furthermore the State Party to submit to the World Heritage Centre, by 1 February 2012, a report on the state of conservation of the property and in particular on how protection could be strengthened for its setting and related vistas, for examination by the World Heritage Committee at its 36th session in 2012.

**Decision: 36 COM 7B.92 – 2012**

**Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom of Great Britain and Northern Island) (C 426 bis)**

The World Heritage Committee,

1. Having examined Document WHC-12/36.COM/7B.Add,
2. Recalling Decision 35 COM 7B.115, adopted at its 35th session (UNESCO, 2011),
3. Acknowledges the information provided by the State Party on the protection of the visual integrity of the property and in respect to major developments in the area;
4. Notes the results of the December 2011 joint World Heritage Centre/ICOMOS reactive monitoring mission to the property and encourages the State Party to implement its recommendations, in particular:
  - a) Further define the immediate and wider setting of the property in relation to its Outstanding Universal Value and embed these in the policies of all the relevant planning authorities,
  - b) Define specific measures, based on the definition of the immediate and the wider setting of the property, and ensure that adequate mechanisms are in place to protect the property and minimize its vulnerability to potential threats to its Outstanding Universal Value;
5. Requests the State Party, in accordance to Paragraph 172 of the Operational Guidelines, to submit to the World Heritage Centre, for review by the Advisory Bodies, the proposed development project at Elizabeth House and any other major proposals, before any irreversible commitment is made;
6. Also requests the State Party to submit to the World Heritage Centre, by 1 February 2014, a report on the state of conservation of the property and on the implementation of the above, for examination by the World Heritage Committee at its 38th session in 2014.

**Decision: 37 COM 8E – 2013****Adoption of retrospective Statements of Outstanding Universal Value**

The World Heritage Committee,

1. Having examined Documents WHC-13/37.COM/8E and WHC-13/37.COM/8E.Add,
2. Congratulates States Parties for the excellent work accomplished in the elaboration of retrospective Statements of Outstanding Universal Value for World Heritage properties in their territories;
3. Adopts the retrospective Statements of Outstanding Universal Value, as presented in the Annex of Document WHC-13/37.COM/8E, for the following World Heritage properties:

**United Kingdom of Great Britain and Northern Ireland:** Blaenavon Industrial Landscape; Blenheim Palace; Canterbury Cathedral, St Augustine's Abbey, and St Martin's Church; Castles and Town Walls of King Edward in Gwynedd; City of Bath; Durham Castle and Cathedral; Giant's Causeway and Causeway Coast; Heart of Neolithic Orkney; Ironbridge Gorge; Maritime Greenwich; New Lanark; Old and New Towns of Edinburgh; Stonehenge, Avebury and Associated Sites; Studley Royal Park including the Ruins of Fountains Abbey; Tower of London; St Kilda; **Westminster Palace, Westminster Abbey and Saint Margaret's Church;**

...

6. Requests the World Heritage Centre to harmonise all sub-headings in the adopted Statements of Outstanding Universal Value where appropriate and when resources and staff time allow to carry out this work;
7. Also requests the State Parties, Advisory Bodies and World Heritage Centre to ensure the use of gender-neutral language in the Statements proposed for adoption to the World Heritage Committee;
8. Further requests the World Heritage Centre to keep the adopted Statements in line with subsequent decisions by the World Heritage Committee concerning name changes of World Heritage properties, and to reflect them throughout the text of the Statements, in consultation with States Parties and Advisory Bodies;
9. Finally requests the States Parties to provide support to the World Heritage Centre for translation of the adopted Statements of Outstanding Universal Value into English or French respectively, and finally requests the Centre to upload these onto its web-pages.

**Decision: 37 COM 7B.90 – 2013****Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom of Great Britain and Northern Ireland) (C 426bis)**

The World Heritage Committee,

1. Having examined Document WHC-13/37.COM/7B.Add,
2. Recalling Decision 36 COM 7B.92, adopted at its 36th session (Saint-Petersburg, 2012),
3. Expresses its concern about the proposed developments at Elizabeth House, Nine Elms Regeneration Development and Vauxhall Island Site and their potential adverse impact on the setting and views of the property and urges the State Party to ensure that these proposals are not approved in their current form and that they be revised in line with the concerns raised by English Heritage;
4. Requests the State Party to strengthen its policy and planning frameworks to ensure the adequate protection of the setting of the property by defining the immediate and wider setting and view cones of the property in relation to its Outstanding Universal Value and by identifying adequate mechanisms within the respective policies of all

relevant planning authorities to ensure that new constructions do not impact on views and other attributes of the property;

5. Also urges the State Party to refrain from approving any large-scale development projects in the vicinity of the property until an adequate protection of its immediate and wider setting is in place;
6. Also requests the State Party to submit to the World Heritage Centre, by 1 February 2014, an updated report on the state of conservation of the property and on the implementation of the above, for examination by the World Heritage Committee at its 38th session in 2014.

**Decision: 39 COM 7B.87****Palace of Westminster and Westminster Abbey including Saint Margaret's Church (United Kingdom of Great Britain and Northern Ireland) (C 426bis)**

The World Heritage Committee,

1. Having examined Document WHC-15/39.COM/7B,
2. Recalling Decisions 37 COM 7B.90 and 38 COM 7B.36, adopted at its 37th (Phnom Penh, 2013) and 38th (Doha, 2014) sessions respectively,
3. Takes note of the State Party's efforts to strengthen the policy and planning framework through guidance documents, but notes nevertheless that there still appears to be an inadequate urban planning framework to manage development in the setting of the property, with the result that development that has been approved contrary to the advice of English Heritage is beginning to have a cumulative negative impact;
4. Deeply regrets that the State Party did not comply with the requests made in Decision 38 COM 7B.36 to ensure that the Nine Elms Regeneration Development Market Towers, Vauxhall Cross and Vauxhall Island Site projects be revised, and notes with concern that they are currently under construction, without the project having been reconsidered after concerns had been raised by English Heritage;
5. Also notes with serious concern that no reconsideration has been made on the Elizabeth House development scheme concerning its design and size and requests the State Party to keep the World Heritage Centre informed on the development of the project;
6. Further notes that the lack of an urban planning framework brings the need to appraise individual projects and also requests the State Party to ensure that, in line with Paragraph 172 of the Operational Guidelines, any larger-scale projects which may be proposed in the future in the immediate and wider setting of the World Heritage property be submitted to the World Heritage Centre as soon as possible, before any decision is taken;
7. Also takes notes that major conservation works are planned for the Palace of Westminster and further requests the State Party to submit, to the World Heritage Centre for review, details as soon as these are available, based on the outcomes of a Heritage Impact Assessment (HIA) in conformity with ICOMOS Guidelines on HIAs for World Heritage cultural properties;
8. Requests furthermore the State Party to finalize the review of the Management Plan for the property as soon as possible;
9. Requests moreover the State Party to invite a joint ICOMOS/ICCROM Reactive Monitoring mission to evaluate the extent of impacts on the Outstanding Universal Value of the property resulting from the implementation of the above-mentioned projects and other current planning applications, and to identify potential courses of action to address ways of strengthening the protection of the property, including through improved planning frameworks and management structures;
10. Finally requests the State Party to submit to the World Heritage Centre, by 1 December 2016, an updated report, including a 1-page executive summary, on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 41st session in 2017.