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22<sup>nd</sup> March 2012

Dear Kishore

#### TOWER OF LONDON (UNITED KINGDOM) (C 488), WESTMINSTERPALACE, WESTMINSTER ABBEY AND SAINT MARGARET'S CHURCH (UNITED KINGDOM) (C 426bis)

In accordance with Decisions 35 COM 7B.114 and 35 COM 7B.115, I am pleased to send you a State of Conservation Report for the Tower of London and Westminster Palace, Westminster Abbey and St Margaret's Church. As well as the Committee decisions, we have also received the report of the reactive monitoring mission sent to both sites in December 2011. Its relevant findings, conclusions and recommendations are noted in the appropriate place.

Because of the great degree of overlap of issues between the two sites and their respective Committee decisions, we have combined the two reports in this letter. Where the response is common to both reports, the answer is provided only in the report on the Tower. Each report is structured according to the format provided by the Centre. The clauses of the World Heritage Committee decision are given in bold and indented. The response of the state party is not indented and does not use bold type.

The UK Government takes its responsibilities under the World Heritage Convention very seriously and is fully committed to protecting, conserving and presenting UK properties on the World Heritage List. In recent years, there has been significant progress in improving protection for those properties and transmitting their outstanding values to future generations. The detailed reports attached to this letter give details of the improvements made to the protection of World Heritage properties in London.

We welcome the many positive comments made in the mission report regarding the state of conservation of the Tower of London and Westminster, and their comments on the effectiveness of the development strategies, planning procedures and management systems which are in place for the properties and, in particular for the steps taken to protect their settings.

We note the continued concerns of the mission that in the end decisions will depend on the views of those who have to take them. We recognise that these decisions can be very difficult because of the need to balance competing priorities within a dynamic and growing world city. Although there will be differences in perspectives from different stakeholders, all stakeholders agree that it is possible to enable growth while also providing a framework for the protection of London's unique historic environment.

We have valued and learnt from discussions as a result of the mission. For example we welcome the suggestion of a Local Setting Study for Westminster to inform the management of future development so that the Outstanding Universal Value and setting of this World Heritage property is appropriately conserved.

In the meantime the UK Government is pleased that the mission has acknowledged wholeheartedly the generally excellent progress made since 2006 in line with its earlier recommendations. The presence of World Heritage properties as part of a constantly and rapidly changing townscape raises challenges and issues that do not arise in other locations. To help address these challenges we welcome the recent work that UNESCO has undertaken concerning management of World Heritage properties in historic urban landscapes, and would value further engagement in the development of this important piece of work.

Yours sincerely

P. Baller

Paul Blaker

Head of World Heritage

cc HE Matthew Sudders, UK Ambassador to UNESCO
UK National Commission for UNESCO
Christopher Young, English Heritage

#### **TOWER OF LONDON (UNITED KINGDOM) (C 488)**

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

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

**Decision: 35 COM 7B.114** 

The World Heritage Committee,

- 1. Having examined Document WHC-11/35.COM/7B,
- 2. Recalling Decision 33 COM 7B.127 adopted at its 33rd session (Seville, 2009),
- 3. Acknowledges the completion of the "Tower of London Local Setting Study", however, expresses great concern that this study only addresses individual views and a very narrow local setting, while the overall setting of the Tower in relation to the Outstanding Universal Value has not been defined and provided with protection in line with Decision 33 COM 7B.127 adopted by the Committee at its 33rd session (Seville, 2009);

The Tower of London Local Setting Study provides detailed guidance for handling change in the immediate setting of the Tower – essentially the area visible at ground level from the Tower perimeter. It is therefore appropriate to provide this level of guidance for an area which is experienced directly with the Tower.

The Mission considered that the management of the Tower and its setting 'is currently being facilitated through the Tower of London Setting Study' and that 'it was an important step towards the protection of the property's setting'. Protection of the wider setting is discussed further below.

 Considers that the incremental developments around the Tower over the past five years have impacted adversely its visual integrity; The UK government recognizes that there have been impacts on the visual integrity of the Tower, notably through the construction of the Shard. It is important, though, to recognize that other proposals, such as that for Potters Field on the south bank of the Thames immediately opposite the Tower, have been modified so that their potential impact has been much lessened. This approach reflects the need to develop a balance between managing growth and protecting the historic environment. In addition since 2006 the Mayor through reviews of the London Plan and associated Supplementary Planning Guidance (SPG), such as the London View Management Framework (LVMF), has revised the protected view of the Tower. These changes have lessened the risk of inappropriate tall buildings in the backdrop to the Tower. The strengthened policies now in place (see below), will further lessen the risk of inappropriate development with an adverse impact on the Tower's visual integrity.

5. 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;

World Heritage properties are defined as sensitive areas within the Environmental Impact Assessment Regulations (2011) (<a href="http://www.legislation.gov.uk/uksi/2011/1824/contents/made">http://www.legislation.gov.uk/uksi/2011/1824/contents/made</a>) which means that any development proposal affecting the property should be the subject of an Environmental Impact Assessment (EIA). An important aspect of any EIA affecting a World Heritage property will be potential impact on its Outstanding Universal Value.

More generally, protection of setting is an integral part of the protection of heritage assets in England. In both *Planning Policy Statement 5* (PPS5) (<a href="http://www.communities.gov.uk/publications/planningandbuilding/pps5">http://www.communities.gov.uk/publications/planningandbuilding/pps5</a>) and CLG Circular 07/09 *Protection of World Heritage Sites* (<a href="http://www.communities.gov.uk/publications/planningandbuilding/circularworldheritage?view=Standard">http://www.communities.gov.uk/publications/planningandbuilding/circularworldheritage?view=Standard</a>), the need to protect setting of World Heritage properties and other heritage assets is clearly stated. This approach has recently been elaborated in English Heritage's *The Setting of Heritage Assets* (<a href="http://www.english-heritage.org.uk/publications/setting-heritage-assets/">http://www.english-heritage.org.uk/publications/setting-heritage-assets/</a>). Protection of setting is about understanding and conserving elements of setting that contribute to the significance of assets and not about protecting every aspect of the asset's surroundings. English Heritage advise that setting should not have specific boundaries since the extent of setting will vary according to the nature of

proposals for development within the vicinity of a heritage asset and the significance of the heritage asset itself. The general approach to setting may be combined with specific policies, for example to protect particular views.

Much of this advice has been developed since 2006. For example Circular 07/09 was published in 2009, followed by PPS5 in 2010, and English Heritage's *The Setting of Heritage Assets* in 2011. The need to protect or enhance the setting of heritage assets is carried through into the new draft National Planning Policy Framework, which will consolidate government planning policy into a more concise and useable format.

The concept of setting as part of heritage protection has been explicitly carried

forward into the development plans of the Mayor of London and Boroughs (please see Appendix 1 for the Planning Policy Context and Appendix 2 for Detailed Extracts of Planning Policies). For example the protection of World Heritage properties, including their setting, is an explicit requirement of policy 7.10 of the revised London Plan (http://www.london.gov.uk/priorities/planning/londonplan), adopted in July 2011. To help clarify the implementation of policy 7.10 the Mayor of London has published Supplementary Planning Guidance (SPG) on how to manage change in the setting of London's four World Heritage properties through decision-making and plan-making processes. Called London's World Heritage Sites – Guidance on Settings SPG (2012) (http://www.london.gov.uk/publication/world-heritagesites-spg) this guidance includes components of EIA and ICOMOS's recommended Heritage Impact Assessment processes. Additionally, the Mayor of London in line with the revised London Plan policies 7.11 and 7.12 has updated the London View Management Framework SPG (2012) (LVMF SPG) (http://www.london.gov.uk/priorities/planning/vision/supplementary-planningguidance/view-management). The LVMF SPG continues to identify and manage a series of protected designated views of key London landmarks, such as the Palace of Westminster and Tower of London. Some of the designated views are geometrically defined (Protected Vistas) and are subject to specific development control, whilst all designated views are subject to Qualitative Visual Assessment. Together they provide a robust framework in which to manage the merits of existing views and to assess the impacts of development within the views. In response to the LVMF SPG, English Heritage published Seeing the History in the View (http://www.english-heritage.org.uk/publications/seeing-history-view/) a methodology for understanding and assessing heritage significance within views. It provides a consistent and positive approach to managing change in the view. This includes consideration of the impact of proposed developments.

Planning policy and development management are both managed by the Mayor and the Boroughs. Within the context of national policy the Mayor sets out the strategic policy framework in which the Boroughs develop their own policy and decision making. The Tower is situated in the London Borough of Tower Hamlets and Westminster in the City of Westminster. Due to spatial arrangement of the Boroughs and the location of the two World Heritage properties, the settings of the properties are managed by adjoining Boroughs, in particular the City of London, Southwark, Lambeth and Wandsworth. All local planning authorities have policies in their local plans to protect the World Heritage properties and their settings. The Mayor's and Boroughs' development plans and their policies relating to the protection of World Heritage properties and their settings have been updated since the 2006 mission.

The UK government believes therefore that progress has now been made so that policies are now in place that seek to protect the setting of the two World Heritage properties. This is a significant improvement upon the situation in 2006, and partly as a response to the recommendations of the 2006 mission. We were pleased to note that the Mission concluded that 'the system of spatial planning .... could (depending on the outcome of consultations and a clearer definition of setting) provide for a comprehensive and effective system of management, as required under the 1972 World Heritage Convention', and also that it considered, with regard to the recommendations of the 2006 mission, that 'the identified gaps' in national legislation and local regulations relating to the protection of World Heritage sites are being addressed through a series of supplementary planning guidance and other publications, which, if approved and suitably translated into defined actions, could comprise one of the most comprehensive sets of guidance on the conservation and management of urban World Heritage Sites available today.' However, the Mission's conclusions state that the 'litmus test' of the robustness of the planning system operating in London rests with how emerging key development proposals that could impact upon the setting of the World Heritage properties will be considered by decision-makers. It is the UK Government's view that the English planning regime provides a robust process based on law, policy guidance and development plans for thoroughly assessing the potential impact of proposals on heritage assets and dealing appropriately with them. The systems inherent checks and balances combined with the changes made since 2006 in the planning framework both at national and at the London level, provide greater clarity or and expectation of the need to conserve the Outstanding Universal Value of London's World Heritage properties in a dynamic and changing World city.

6. Also requests the State Party to refrain from approving new construction projects in the vicinity of the property without assessing their potential impact on the Outstanding Universal Value of the property;

World Heritage properties are named as sensitive areas within the Environmental Impact Assessment Regulations. All developments affecting the World Heritage property or its setting should therefore be screened to see whether an Environmental Impact Assessment is required. Any assessment will include evaluation of the potential impact of the development on the Outstanding Universal Value of the property. In addition, national, London-wide and Borough planning policies clearly set out the need for development proposals to be considered against the impact they may have upon the, significance, setting and Outstanding Universal Value of World Heritage properties. In addition the Mayor has issued SPG on *London's World Heritage Sites – Guidance on Settings* (2012) which provides further guidance on how to assess the impact of developments upon the setting of World Heritage Sites. This has been developed with reference to English Heritage's *The Setting of Heritage Assets* (2011) and ICOMOS Heritage Impact Assessments.

7. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to 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 and 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;

The UK Government were pleased to invite a Mission, which took place from 5th to 8th December 2011, and to receive the report of the Mission on 9th February. As agreed with the World Heritage Centre, the report has been shared with the key stakeholders who met the Mission. Factual comments on the report, as requested by you, were sent to the Centre on 27th February.

The agreed terms of reference were to:

- 1. Review and discuss with national and local authorities the overall situation of the properties with regard to their state of conservation in their urban context and particularly their visual integrity;
- 2. Review progress with addressing the recommendations of the 2006 joint UNESCO/ICOMOS Reactive Monitoring Mission, as set out in the decisions of the World Heritage Committee;
- Assess how incremental changes since the 2006 Mission as well as current and proposed major development projects in the immediate and wider setting of the properties impact adversely, or might impact adversely, on their Outstanding Universal Value;
- 4. Discuss with national and local authorities how, in the absence of buffer zones, the immediate and wider settings of the properties might be defined as a basis for evaluating the impact of proposed development on Outstanding Universal Value and for putting in place appropriate, specific protection;
- 5. Review the current mechanisms in place and any under development for protecting the properties and their settings.

Dealing in turn with the principal aspects of these terms of reference:

Overall situation of the properties with regard to their state of conservation in their urban context and particularly their visual integrity (items 1 and 3 of the terms of reference)

We are pleased to see that the Mission considered that both properties are in a good state of conservation which is exemplary in terms of the identification, protection, conservation, presentation and transmission to future generations of heritage, and to note their comment that the overall state of conservation has in fact improved since 2006. The UK Government is proud of the efforts made by the managers of both the Tower and Westminster to conserve the properties in an exemplary way. We note the Mission's concern about the adverse visual impact on the Tower of the Shard of Glass and their comments on the need to manage very carefully further development at London Bridge to avoid further adverse visual impact. In addition to the Shard of Glass other recent developments that have been considered in terms of their impact upon the Tower of London and subsequently approved include The Quill, the re-cladding of Guy's Hospital Tower, and the Potter's Fields. With the pressure for further

development expected to continue in the London Bridge area, the UK Government are encouraged by Southwark Council's intention of developing a Supplementary Planning Document (SPD) in partnership with other stakeholders that seeks to provide clarity on how and where development can take place. It is expected that this SPD will help define appropriate building height thresholds as part of a robust planning framework supported by detailed evidence that assesses thoroughly the potential for development, including tall buildings, without causing harm to the Outstanding Universal Value of the Tower of London. Through this rigorous process, it is the UK Government's expectation that the conservation of the Outstanding Universal Value of the Tower of London, as expressed in its setting will be a central component of the findings of the SPD. This SPD, as part of the development plan for the area, will inform the appropriateness of subsequent development proposals.

## <u>Progress in the implementation of the recommendations of the 2006 Mission</u> (items 2, 4, and 5 of the terms of reference

The three topics of major concern identified in 2006 were a tall building strategy which was resulting in adverse impacts on the visual integrity of both properties; gaps in national legislation and local regulation relating to the protection of World Heritage sites; and the need to complete the Management Plans for both properties.

Dealing first with the last point, Management Plans for both properties were completed in 2007. We welcome the Mission's conclusion that the plans 'provide a solid framework for mid-term decision-making as regards the conservation and enhancement of the World Heritage Sites and the protection of their Outstanding Universal Value'. The management plans are now linked to planning policy in the revised London Plan and relevant Borough development plans. This approach reflects the advice of Circular 07/09 where relevant policies in management plans are identified as key material considerations, and should be embedded in appropriate spatial planning policies.

Progress on the first two points depends largely on the establishment of appropriate spatial planning systems nationally and at London and local level for the protection of the historic environment in general and of World Heritage properties in particular. Since 2006 there has been considerable progress at all levels. The publication of PPS5 in 2010 provided an integrated approach to the protection of the historic environment, focused very much on the identification,

protection and enhancement of significance of heritage assets. This approach has been carried through into the draft National Planning Policy Framework and both documents emphasis the need to treat World Heritage properties as designations of the highest significance, harm to which should be wholly exceptional. Both documents also stress the importance of setting to the protection of heritage assets because of the need to consider them in their wider context.

This general guidance is supplemented by Communities and Local Government (CLG) Circular 07/09 The Protection of World Heritage Sites published in 2009. This is supported further by English Heritage guidance, which has been endorsed by ministers. The Circular states:

- Statements of Outstanding Universal Value are key references for the effective protection and management of World Heritage Sites (*please see Appendix 3 for details of the Statement so Outstanding Universal Value*).
- World Heritage Sites can also contribute to a national and local sense of community and to sustainable economic development and sustainable regeneration.
- Local authorities should have appropriate spatial planning policies to protect World Heritage properties which should aim to:
  - protect the property and its setting, including any buffer zone, from inappropriate development;
  - strike a balance between the needs of conservation, biodiversity, access, the interests of the local community and the sustainable economic use of the property in its setting;
  - protect a World Heritage Site from the effect of changes which are relatively minor, but which, on a cumulative basis, could have a significant effect;
  - enhance the World Heritage Site where appropriate and possible through positive management; and
  - protect World Heritage Sites from climate change but ensure that mitigation is not at the expense of authenticity or integrity.
- World Heritage properties are a key material consideration in the planning system.
- World Heritage properties should have Management Plans to protect their Outstanding Universal Value.
- Management Plans should be prepared in a consensual way by the key stakeholders in each property, including significant landowners.

- There should be a steering group of key stakeholders, including significant landowners.
- Relevant policies in Management Plans are key material considerations in the spatial planning system.
- Local authorities should support and promote World Heritage properties in all their actions, not just within the spatial planning system.
- When a local authority is minded to grant consent for a planning application to which English Heritage has maintained an objection, the authority must refer the case to the Secretary of State for CLG for him to consider calling it in for decision at national level.

The advice in the Circular has been reinforced by a concerted effort to ensure that all UK World Heritage properties have Statements of Outstanding Universal Value agreed by the World Heritage Committee. Statements have now been agreed or submitted for all 28 UK properties. Both Westminster and the Tower have Statements of Significance agreed by the World Heritage Committee in 2008 and draft Statements of Outstanding Universal Value were submitted to the Centre on 1 February, 2011. It would greatly assist their protection to have these Statements considered by the Committee at the earliest opportunity.

A subject of ongoing debate between the UK and the World Heritage Committee has been the efficacy or otherwise of buffer zones and alternative approaches to protection of the wider setting of World Heritage properties. The UK accepts that in some cases a buffer zone is entirely appropriate, for example when a property is surrounded by very clearly defined visual limits such as prominent ridge lines. More normally, though, a more flexible approach is needed. This approach is set out in PPS5, Circular 07/09 and is further elaborated in English Heritage's *The Setting of Heritage Assets*. All advocate a flexible approach to setting since the area over which a development can impact upon a heritage asset will vary according to its nature. The UK Government believes that this approach is an effective means of protecting the significance of heritage assets.

In addition to national policy guidance, there are well established policies within London. The revised London Plan, adopted in 2011, sets out a series of key objectives including the need to ensure that London's 'world class heritage' is appropriately sustained and enhanced for the future through a number of strategic heritage policies, including Policy 7.10, which seeks the protection and enhancement of London's World Heritage properties for their Outstanding Universal Value and settings. Policy 7.8 provides a broad heritage policy that identifies the need for the conservation of the significance of all heritage assets,

including their settings. Policies 7.11 and 7.12 seek to sustain and enhance strategic views of London, including specific designated views of both the Tower of London and Palace of Westminster.

The LVMF SPG expands upon London Plan Policies 7.11 and 7.12 by defining the nature and methodology of management for each designated view identified in the London Plan. This includes a series of management plans for each designated view that defines viewing places, viewing areas, assessment points, and identifies and assesses the component parts of the view that needs to be managed. Since 2006 the LVMF SPG has been revised with the result that new designated views have been identified for the Tower of London and Palace of Westminster and the guidance has been strengthened. In the case of the London Plan designated view of the Tower of London a series of assessment points have been identified and linked so forming a dynamic view. This linking of the assessment points has helped ensure that key features of the Tower of London are now carefully assessed. From all three points the silhouette of the White Tower is protected. The middle assessment point is the basis for Protected Vista. In the case of the Palace of Westminster, the revised London Plan introduced a designated view from Parliament Square to the Palace of Westminster. The revised LVMF SPG (2012) identifies four assessment points, two on the north side of the Square, and two on the south west corner of the Square. Both sets are dynamic views, with the views from the northern side of the Square including the provision of the protected silhouette of the Palace of Westminster.

The Mayor of London has also published a SPG on how to manage change in the setting of London's World Heritage properties through decision-making and plan-making processes. This seeks to clarify, principally, the implementation of London Plan policy 7.10. This adopts the English Heritage approach to the definition of setting, and incorporates components of EIA and ICOMOS's recommended Heritage Impact Assessment processes.

The properties are also protected by the local plans of the Boroughs in which they are sited and of the adjoining Boroughs. All these plans have policies to protect both the World Heritage property and its setting. In addition, for the Tower, a Local Setting Study provides detailed guidance for the management of the area immediately around the Tower. The UK government believes that, with the addition of a similar Local Setting Study for Westminster, protection for the Outstanding Universal Value of the World Heritage properties is adequate and greatly improved on what existed in 2006.

The UK government welcomes the recognition by the mission that 'taken together, these [systems] probably provide some of the most comprehensive guidance on the conservation and management of urban World Heritage today', and that 'all major concerns related to legislation and regulation raised during the 2006 joint ICOMOS-WHC Reactive Monitoring Mission have been addressed.

8. 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 on the steps taken to implement all the decisions of the Committee, for examination by the World Heritage Committee at its 36th session in 2012.

This forms the requested report.

2. Other current conservation issues identified by the State Party
[Note: conservation issues which are not mentioned in the Decision of
the World Heritage Committee or any information request from the
World Heritage Centre]

Information on planning cases in the vicinity of the Tower was included in the briefing pack for the mission.

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

None

### WESTMINSTER PALACE, WESTMINSTER ABBEY AND SAINT MARGARET'S CHURCH (UNITED KINGDOM) (C 426BIS)

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

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

**Decision: 35 COM 7B.115** 

The World Heritage Committee,

- 1. <u>Having examined</u> Document WHC-11/35.COM/7B,
- 2. Recalling Decision 33 COM 7B.128, adopted at its 33rd session (Seville, 2009),
- 3. <u>Notes</u> the intention of the State Party to address issues related to the protection of the visual integrity of the property:

See responses below for update on the actions taken to address issues related to the protection of the visual integrity of the property

4. <u>Notes with regret</u> that specific measures to protect the immediate and wider settings and have not yet been sufficiently developed;

General measures and policies to protect the setting of London World Heritage properties are described under item 7 of the report on the Tower of London (above)

Since 2006, the Mayor of London has identified a designated view from Parliament Square of the Palace of Westminster. The revised LVMF SPG identifies four assessment points, two on the north side of the Square, and two on the south west corner of the Square. Both sets are dynamic views, with the views from the northern side of the Square including the provision of the protected silhouette for the Palace of Westminster. This should help contribute towards providing a basis for protecting the setting of the Palace of Westminster, including the gap between the Clock Tower and Portcullis House as well as the

skyline of the Palace. However we note the Mission's concern about the potential impacts of inappropriate development of Elizabeth House at Waterloo Station. It is the UK Government's expectation that when this proposal is submitted that it will be considered against both national, London and Borough policies, including the need to conserve the Outstanding Universal Value of the Westminster World Heritage Site and its setting.

We welcome their view that the LVMF SPG 'could definitely provide a statutory basis for the protection of identified views, vistas and silhouettes, while the London's World Heritage Sites- Guidance on Settings SPG 'might become a solid basis for future statutory control of developments and assessment of their impact on the visual integrity of the World Heritage Sites and their settings'. It should also be noted that the settings SPG should help provide further general guidance on the management of development within the setting of Westminster.

However, as discussed with the Mission, further specific protection for the setting of the Westminster World Heritage Site could be developed. With this in mind the Missions recommendation of a Local Setting Study, similar to that for the Tower of London, for Westminster, is welcomed. We believe that such a study, dealing with the areas immediately adjacent to, and visible from the World Heritage property, could provide detailed specific guidance for their protection and enhancement. We agree with the Mission that the other tools described elsewhere in this report (see Tower of London report above, section 7) can help contribute towards the protection of the wider setting provided that they are fully taken into account by the appropriate decision-takers.

# 5. <u>Notes with concern</u> that the State Party acknowledges that major developments currently being considered could have a potential impact on the property;

As explained at the meeting of the Committee, but not reflected in the decision, this is a misunderstanding of our previous report which listed, as requested, major developments that had been proposed in the area. Of these, two had been granted consent before the 2006 mission. The remainder have been turned down since the 2006 mission.

However, it is not possible to stop developers proposing developments which may have a potentially adverse impact on Outstanding Universal Value, since they are entitled to bring forward any schemes that they choose. The English planning system in general and the planning policies in London in particular, contain robust provisions to ensure that any proposals are evaluated for their potential impact on the Outstanding Universal Value of the property, while policies are in place to prevent development judged to have an adverse impact. This is demonstrated by the fact that the developments listed in our previous report have been refused consent.

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;

See comments on Tower report, item 5

7. <u>Also requests</u> the State Party to refrain from approving any new development project until an adequate protection of the setting of the property is in place;

See comments under Tower report, item 6 and response to Westminster, item 4 above. We believe that protection of the setting of Westminster World Heritage has been improved since 2006 and that the impact of proposed developments can be properly assessed through existing processes. However, as highlighted by the Mission further specific protection for Westminster could be developed in the form of a Local Setting Study.

8. <u>Further requests</u> 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;

See response to Tower report, item 7 above

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.

This forms the requested report

2. Other current conservation issues identified by the State Party
[Note: conservation issues which are not mentioned in the Decision of
the World Heritage Committee or any information request from the
World Heritage Centre]

Information on planning cases in the vicinity of Westminster was included in the briefing pack for the mission.

The revised Elizabeth House development proposal is currently at pre-application stage, with the expectation that a formal submission of the proposal may be made in May 2012. As part of the planning process, at its formal submission stage the merits of the application will be considered against the respective development plan policies, such as the London Plan, Lambeth's Local Development Framework and any relevant supplementary planning guidance/documents. Once the application has been submitted we can supply further details.

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

None