

# **TOWER OF LONDON**

## **United Kingdom (488)**

In accordance with the request dated 02 April 2024 from the World Heritage Centre to the UK Government (Ref: CLT/WHC/ENA/24/14674), the State Party has produced a report on the State of Conservation of the Tower of London World Heritage Site.

As requested, this report is structured according to the format set out in Annex 13 of the *Operational Guidelines (2023)*. The specific points raised in the World Heritage Centre's request are reproduced in italics and indented.

### **1. Executive Summary**

The State Party takes seriously the cumulative impact of development within the setting of the Tower of London. Input from the World Heritage Centre and ICOMOS International to support the advice provided by the national adviser, Historic England, on both individual schemes and emerging policy has been welcomed.

The Tower of London and its settings sit within 3 different local areas. As a result, a number of Local Plans jointly provide protection for the property and manage change within its setting and a number of these are currently under review, coming forward during 2025. There are also various individual schemes proposed within its setting currently under consideration.

The concept of clustering tall buildings in such a way as to avoid a harmful cumulative impact on the property's OUV is in line with the direct recommendation from the World Heritage Committee in 2007 and this policy approach has not changed. The City of London Corporation has proposed a new City Plan 2040 which would continue to consolidate the existing City Cluster of tall buildings in line with the World Heritage's Committee's recommendation. The ongoing local plan review has explored in detail how the approaches to tall buildings and the accompanying evidence base would manage the effects of such development within the Tower's setting.

The State Party's position remains that the protections under the planning system and national planning policy relating to setting best serve the complexity of the dynamic urban environment surrounding the Tower. It does not consider a buffer zone is necessary. Protection is afforded by other designations and under robust and evidenced planning policy. Similarly, the State Party considers it is most appropriate to work with up-to-date visual impact and views assessments which provide valuable baseline evidence to inform heritage impact assessment.

The State Party believes that its planning system fully addresses its obligations under the World Heritage Convention in a way that is consistent with the UN Sustainable Development Goals. In order to achieve net gains across each sustainable development objective, the State Party requires balanced and informed judgements within the context of the local and national policy framework.

As the custodians of the Tower of London, Historic Royal Palaces' (HRP) programme of projects and conservation seeks to sustain the property's OUV whilst delivering meaningful and positive impacts for both the palace and the planet. HRP's management of the property will be enhanced by the additional technical support it has commissioned which will include

assisting with work to update documentation critical to the protection and management system, principally the WHS Management Plan.

The State Party anticipates further notifications under paragraph 172 on upcoming development proposals and new and updated policy, but also that guidance and advice will continue to be developed to ensure effective protection and management for the property.