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Dear Sir

## NEW DRAFT LONDON PLAN 2018

Historic Royal Palaces generally welcomes the new draft London Plan for its scope, coherent structure and focused approach to key issues facing the capital's historic environment- in particular, its recognition of the value of London's heritage assets and the distinctive character of its historic places.

As guardians of the Tower of London World Heritage Site (WHS), one of London's four UNESCO-designated WHS, Historic Royal Palaces' principal concern is with the planning policies for the historic environment, particularly as these seek to protect and enhance the setting of the WHS, or relate to development likely to have an effect on WHS in general and the Tower of London WHS in particular.

Our detailed comments on the new draft London Plan are set out below, referenced to the relevant policies and paragraphs of the document, as requested.

### Chapter 2 Spatial Development Patterns

#### *Policy 504 The Central Activities Zone (CAZ)*

The CAZ includes the Tower of London within its eastern boundary and all or part of the three local planning authority areas surrounding the WHS. We therefore support the references in Part C of the policy to sustaining and enhancing the distinctive environment and heritage of the CAZ; and the recognition in paragraph 2.4.7 of its strategic elements, including the River Thames, WHS and designated views. Given the range and diversity of organisations responsible for these important elements of the capital's heritage, however, we would hope that the Mayor could provide stronger policy guidance and leadership to ensure appropriate protection for the strategic value of these exceptional assets for the future.

## Chapter 3 Design

### *Policy DB Tall buildings*

Historic Royal Palaces is pleased to note the inclusion of expanded and detailed guidance in Policy D8 of the Plan on the design and location of tall buildings. The identification of the threefold impacts of tall buildings- visual, functional or environmental - is helpful, as are the detailed criteria for how these impacts should be assessed when considering development proposals for tall building. We should, however, like to see clarification regarding the definition of appropriate areas for tall buildings and the work required to justify them over other forms of development.

We welcome paragraph (e) under the heading 'Visual impacts' relating to tall buildings in the setting of WHS, requiring them '...to preserve the Outstanding Universal Value of the WHS and the ability to appreciate it.' The extent of setting is not fixed, however, and will be proportionate to the scale of the development proposed, a point that should be made clear. A very tall building can have a significant impact on the wider setting of a WHS, often unexpectedly, from a considerable distance away. We are mindful also of past and current conflicts with the UK's duty under the World Heritage Convention and ongoing international scrutiny, that has resulted in the risk of both the Tower of London and Westminster WHS being placed on the World Heritage 'in danger' list. It would be helpful if the Plan could more specifically promote approaches that would actively avoid recurrence of such conflicts.

A brief explanation of OUV and its 'attributes' would be desirable here, the first time that OUV is mentioned, or at least a reference to where such an explanation can be found, for example, in Polic HC2, World Heritage Sites (see below).

## Chapter 7 Heritage and Culture

### *Policy HC2 World Heritage Sites*

We are encouraged to see that the chapter on Heritage and Culture includes a specific policy (HC2) on the conservation, promotion and active protection of the London WHS, with supporting text in paragraphs 7.2.1- 7.2.6, which helpfully amplify the guidance given in previous plans. Historic Royal Palaces strongly supports this important policy, which provides a more robust approach to the protection of the OUV of London's WHS. It also reflects recommendations made in the ICOMOS/ICCROM report following the recent UNESCO Reactive Monitoring Mission to London (to the Westminster WHS) in February 2017.

Reference is made in both this policy and its supporting text to the Outstanding Universal Value (OUV) of WHS, the 'attributes' that convey that OUV and their 'authenticity' and 'integrity'. These terms are not in daily use within the UK planning system and may be unfamiliar to many reading the Plan. Whilst OUV is largely self-explanatory (and is included in the Plan's Glossary), the other terms are not and definitions in the Glossary, or a reference to where such definitions can be found easily, should be included.

Paragraph 7.2.5 points to the current versions of the WHS Management Plans for a description of each site's attributes, which the Tower of London WHS Management Plan 2016 certainly includes, but more accessible definitions would be helpful.

We strongly support the recommendation in paragraph 7.2.3 that views additional to those identified in the *London View Management Framework* (LVMF) may be required in order to consider the attributes that contribute to a site's OUV, particular the significance of its setting. The Tower of London WHS Management Plan 2008 had as one of its objective the preparation of an assessment of the Tower's local setting, including key local views of and from the Tower and this resulted in the publication of the *Tower of London Local Setting Study* 2010. The study has been of great help to Historic Royal Palaces, the local planning authorities and developers is assessing the potential impact of proposed development adjacent to the WHS.

We welcome the Mayor's expression of support in paragraph 7.2.6 for steering groups that assist with the management of WHS and the implementation of WHS Management Plans. The Tower of London WHS Consultative Committee has been in existence for some time and the GLA's contribution to the group is valued.

#### *Policy HC3 Strategic and Local Views*

Historic Royal Palaces endorses the importance of the LVMF and its Supplementary Planning Guidance on the management of designated views. We welcome the statement in paragraph 7.3.4 that 'Some views are experienced as a person moves through a viewing area and assessment of development proposals should consider this.' Views are very rarely static and are nearly always kinetic or dynamic, a fact that is often overlooked, or avoided, in preparing formal assessments of the potential impact of development proposals on the setting of the Tower of London WHS.

We note that the Mayor intends to review the LVMF SPG when necessary to ensure its compliance with policies HC3 Strategic and Local Views and HC4 London View Management Framework. Historic Royal Palaces would not wish to see its scope and requirements weakened or diluted in any way.

#### *Policy HC4 London View Management Framework*

As one of three strategically-important London landmarks identified by the Mayor (the other two being St Paul's Cathedral and the Palace of Westminster), the protection of key views of the Tower of London WHS provided by the LVMF is vitally important to maintaining the property's OUV. We therefore welcome and support the clear and specific guidance relating to designated views set out in policy HC4.

## Chapter 9 Sustainable Infrastructure

### *Policy S/74 Waterways - strategic role*

The River Thames is the defining, common element of the setting of some of London's most important historic sites, including the Tower of London. The Thames Landscape Strategies have not been promoted in recent years and no such strategy exists for the stretch of river between Chelsea and Tower Bridge. We consider that policy S114 should therefore seek to convey the river's strategic importance and its cultural values, as well as its heritage and natural values.

A key priority for Historic Royal Palaces is addressing the current lack of connection of the Thames path to Tower Wharf at Tower Pier. This has a significant impact on visitors' access to the Tower. We would therefore urge the Mayor to promote the development of a joint Thames Strategy for this important central section of the river between Chelsea and Tower Bridge as outlined in paragraphs 9.14.6 and 9.14.7.