

18/01213/FULEIA – Land Adjacent to 20 Bury Street ‘Tulip’

Committee Report Addendum

29 March 2019

Report Correction

Paragraph 44, page 76, sub paragraph 6, second sentence should read:

*“HRP consider that the claimed public benefit of the development, which would neither offer enhancement of the WHS, nor fulfil a planning policy objective, would **not** outweigh the potential harm to the WHS”*

Late Representations

Additional representations have been received since the report has been published. 11 comments have been received in support of the application and 3 objecting to the application.

These representations do not raise any new issues and a copy of all the letters and representations are attached to this addendum report.

Online Mr Chris Hession	Support	26 March 2019
Online Miss Kelly Knowles-Lane	Support	26 March 2019
Online Mr Stuart Walker	Support	26 March 2019
Online Mr Simon Brazier	Support	26 March 2019
Online Mr Ricardo Nunes	Support	26 March 2019
Online Mr Jaroslav Tomcala	Support	26 March 2019
Online Ms Hilary Clarke	Object	26 March 2019
Online Mr Jon Clarke	Object	26 March 2019
Online Mr John Necholas	Support	27 March 2019
Online Mr Alberico De Chiara	Support	27 March 2019
Online Miss Jane White	Support	27 March 2019
Online Mr Valentine Jennings	Support	28 March 2019
Email Mr Sean Reid	Object	28 March 2019
Online Mr William Green	Support	29 March 2019

Letter Mr David Ereira and Mr David Arden on behalf of the London Sephardi Trust dated 28 March 2019

This letter states:

“Following discussions with the Applicant, please record the S&P Sephardi Community and the London Sephardi Trust as no longer being opposed to the grant of the planning permission.

We confirm that the Applicant has agreed to make a contribution proportional to mitigate the impacts of the development on the Synagogue. Given this contribution and the educational benefits of the Synagogue referred to in our letter of 7th March 2019, the S&P Sephardi Community and the London Sephardi Trust are able to support the Application.”

Additional Letters from Department of Culture Media & Sport (DCMS), UNESCO and ICOMOS

Letter Department for Digital, Culture Media & Sport (DCMS) dated 11 December 2018

This letter states in line with paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, they write to notify UNESCO that the proposed development is within the setting of the Tower of London World Heritage Site and have provided a link to where the applicant documents can be seen.

Letter UNESCO - Culture Sector World Heritage Centre dated 20 December 2018

A letter was received from UNESCO acknowledging the letter sent by DCMS on 11th December. The letter states that “the overall impact of the proposed developments within the setting of the World Heritage property is assessed in an integrative approach considering the accumulative effect as a whole within the setting of the property and their potential impact to its Outstanding Universal Value. I trust that this will be considered before an irreversible decision is taken”

They state that this information has been forwarded to ICOMOS and ICCROM for their information and review and shall get back to the City of London should ICMOS have any comments.

ICOMOS Technical Review Letter received 28 March 2018

Following the letter from UNESCO. A technical review letter has been received from ICOMOS objecting to the application. The letter states that:

“ICOMOS considers that the proposed development project (not classifying its architectural values) is not compatible with the preservation of the integrity of the World Heritage property of the Tower of London, and would therefore advise that the State Party:

- Abandon the Tulip development project;*
- Adopt a stricter and more appropriate evaluation of proposed constructions that could have an impact on World Heritage properties, giving priority to the preservation of OUV, in line with previous mission recommendations.”*

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education/community facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

Case Officer: Bhakti Depala

Customer Details

Name: Mr Chris Hession

Address: Basement Flat Grafton Chambers Grafton Place, Euston

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I've been following this application carefully as I absolutely love it! London's already got what is becoming an incredible skyline and this is only going to make it better! I only wish it could be taller so it forms the "peak" to the city's skyline.

I have no idea why people would object to this, it's gonna look great!!

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss kelly knowles-lane

Address: 86 chelmer road Chelmsford

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Love the idea of the Tulip and what it will bring to the city of London.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stuart Walker

Address: 111 Old Broad Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This is an inspirational development and would be magnificent on the London skyline. A truly amazing piece of architecture that will give back to the community through people's desire to visit the area plus the support to school children through the classes.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Simon Brazier

Address: 43 Higham Road Woodford Green

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Local neighbour who would welcome such an attraction, on the proviso that it's built with the same consideration to the local community as The Gherkin was next door.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ricardo Nunes

Address: Apartment 50, Roman House Wood Street LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I recently went to see The Tulip exhibition, which took place in the building/location where it is intended to be build, next to my office. I highly support the project. It will be a great addition to London and specifically to the City of London. With stunning architecture and functional spaces for visitors/tourists and space for the community in relation to educational programs too, I think The Tulip is a brilliant project. Also adding new bars/restaurants - more options to entertain clients and have business meetings. How exciting! Congrats to all the team for the vision and helping to keep our beloved London the most amazing City.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jaroslav Tomcala

Address: 12 Newport Avenue 14 Adventures Court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I found this project very interesting and I support it.

Employee in Aviva St. Helen's

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Hilary Clarke

Address: Flat 27 3 Market Yard Mews London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I cannot believe that anyone is seriously considering giving this the go-ahead! London is an ancient and magnificent capital, not an amusement arcade. It does not deserve something that I suspect even Las Vegas would consider tacky. As for its "educational value", the only lesson I can see here is that from high buildings, you can see a long way. Perhaps the money could be put into museums or libraries, or heaven forefend - schools, rather than this hideous vanity project. It would be a blot on the landscape from which, due to its overinflated scale, the local populous would never be able to escape. Tourists already know that London exists. They come for the history, the culture, even the nightlife. They do not come for an out of place Disneyland ride.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jon Clarke

Address: 48 Lyndhurst Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This must rank as one of the most preposterous ideas ever to have hit the City of London. When are these idiot architects going to realise that London is a city of majesty, history and world significance, NOT a plastic "new-build playground" such as Dubai or anywhere in America? We have too many ugly eyesores already desecrating the skyline of our capital, without a pseudo-"Blade Runner" w**k-fantasy blotting our overcrowded skyline. It has no merit, no joy, no worth, no benefit. If permitted, it will merely be a laughing-stock. SAY NO.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr JOHN NECHOLAS

Address: 15 CARBERY AVENUE ACTON LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: A visionary wonderful use of space which will add immeasurably to that part of London. Don't think any others can come up with anything remotely like it and having seen it, my family and I gave it our full support.

The beauty and uniqueness of the project commends itself to anyone with taste and foresight.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Alberico De Chiara

Address: 51 Templar House Shoot-up Hill London (UK)

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I was at the exhibition, although I knew about the project long before.

It is a stunning addition to the London skyline and it does not interfere with any "prohibited" views.

Thumbs up! Build it, and the sooner the better. It is an incredible concept encapsulating many important features, not least the educational factor.

It is a slim building and elegant.

I and lots of friends of mine are all in favour, so this is my very positive comment.

All the best and congratulation to all for putting forward such incredible structure. It can be built faster considering the new super-quick building techniques in construction.

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Jane White

Address: 26 Aubrey Beardsley House Vauxhall Bridge Rd London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I think it looks an attractive development. I like the fact that school children will be able to visit classrooms in the Tulip.

I'm sure it will be a good addition to the City

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Valentine Jennings

Address: 24 Kylemore Road LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: The Tulip would be an exciting addition to London's skyline. Given its location amongst the other tall buildings in the City, it can't be accused of affecting any views.

From: Reid, Sean
To: [PLN - Comments](#)
Subject: RE: Planning submission
Date: 28 March 2019 11:31:32

Dear Mr Bhakti Depala,

RE: Planning Application Consultation: 18/01213/FULEIA

We represent the owners of 50 St Mary Axe (the "Owners"), a neighboring property to the proposed development. 50 St Mary Axe is a very significant contributor to the City economy, is the place of work across 8 floors of a large community of people, and is central to the character of the local area by providing dental services, fitness facilities and a coffee house. Unlike many of the people consulted by the applicant, the Owners are a local stakeholder.

The Owners have 6 strong objections to the scheme, and ask that you feed these directly into the Committee's discussions and decision regarding the application.

1.Capacity to absorb increased footfall and traffic

The application does not adequately address the impacts that a successful "visitor attraction" would have on the area. The application fully acknowledges the already very high pedestrian and vehicle movements around the site and makes several observations, but does not credibly propose solutions or improvements. The Owners have been collaborating with the City of London for some time towards improvements to the local area, and have been working towards a calming of the traffic and the semi-pedestrianisation of St Mary Axe, as well as the introduction of greenery and artwork. These plans have been consulted on and a trial project is (the Owner understands) to be implemented shortly. During the dialogue with the City of London the Owners were advised that the buildings currently under construction in the area would result in circa 35,000 working in the immediate vicinity and as a result pavements would need to be widened and additional provisions made for cyclists. On this basis there is no capacity remaining to accommodate this proposed development without the introduction of considerable mitigation works.

2. Character of the area and suitability for the project

The proposed scheme is a very isolated, stand-alone "visitor attraction". There is no context and no supporting infrastructure, and so it will exist in a void. We fully support "the addition of cultural and educational visitor attractions to existing office and business uses" but the proposed scheme does not achieve this satisfactorily or in an integrated manner. In fact, the proposed scheme as it stands risks being detrimental to the area and to the existing residents.

3. Loss of sunlight, issues of permanent shade and impact on rights of light

The BRE report submitted alongside the application notes and concludes that there will be a loss of daylight and sunlight to the neighbouring commercial buildings. It also notes that there will be an unknown level of discomfort glare, which is particularly likely from the underside of the structure and the shaft.

Added to this, the long list of expensive specialists that the applicant has engaged places many owners and occupiers at a disadvantage in protecting their rights. In respect of the Owners, their key advisor whom they have worked with on rights of light issues has been retained by the applicant and has indicated they can no longer advise the Owners.

4. Noise and construction since 2013

The application makes little reference to the fact that the area has already been blighted by heavy permanent construction since 2013. The noise levels, dust levels, and vibration levels have been intolerable. There have even been instances of construction traffic reversing into the front of the building and damaging the entrance. The feedback from those working at 50 St. Mary Axe is that they have “frankly had enough”, and there is zero appetite for another 5 years of heavy construction, which would further prevent St. Mary Axe from being semi-pedestrianised.

5. Ethos of the project

The proposed structure is being cynically marketed as an “educational facility” in order to win public support. We note the publicity of “20,000 free places for London’s state school children” as a major selling point. When the ongoing narrative is about falling budgets for London’s state schools, we fail to see how this “educational facility” sits well alongside the exclusive champagne bar and gourmet restaurant. The proposed height of 305.3m suggests that this is simply a vanity project, and the real motivation is to build and own the tallest building in London.

6. Lack of architectural merit

Finally the proposed scheme is an eyesore, and detracts significantly from the architectural heritage of the area, and in particular Lloyds Building, The Gherkin and 60 –70 St. Mary Axe. The applicant outlines the cultural attractions, the historical attractions and the architectural attractions of the area on page 25 of the Design and Access Statement, but does not prove how the proposed scheme enhances any of these. As soon as the novelty value wears off, there is a very high risk of the proposed scheme becoming a white elephant.

Finally we confirm that we have not been approached or consulted by the applicant or its team, although our Building Manager did voluntarily visit the exhibition.

For all the above reasons, the Owners request that you reject the application.

Please do not hesitate to contact us should you have any queries.

Kind Regards
Sean

Sean Reid | Trust Manager

Butterfield Trust (Guernsey) Limited | PO Box 25 | Regency Court, Glatigny Esplanade, St. Peter Port, Guernsey, GY1 3AP | Channel Islands

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Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr William Green

Address: 15 Cleveleys Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Exciting new design in area of assertive modernity. Offer of education facilities in building is pleasing.



28th March 2019

Bhakti Depala
Development Division
Department of the Built Environment
City of London
Guildhall
PO Box 270
London EC2P 2EJ

Dear Ms Depala

Planning application ref 18/01213/FULEIA - The Tulip - withdrawal of objections made by the S&P Sephardi Community and the London Sephardi Trust

Following discussions with the Applicant, please record the S&P Sephardi Community and the London Sephardi Trust as no longer being opposed to the grant of the planning permission.

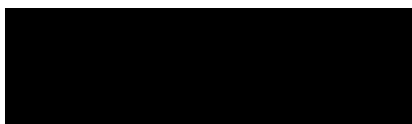
We confirm that The Applicant has agreed to make a contribution proportional to mitigate the impacts of the development on the Synagogue. Given this contribution and the educational benefits to the Synagogue referred to in our letter of 7th March 2019, the S&P Sephardi Community and the London Sephardi Trust are able to support the Application.

Yours sincerely



DAVID ARAGN CEO

On behalf of the S&P Sephardi Community



D. EREIRA TRUSTEE

On behalf of the London Sephardi Trust



Department for Digital, Culture Media & Sport

Heritage Team
4th Floor
100 Parliament Street
London SW1A 2BQ
T: 020 7211 6000
F: 020 7211 6309
enquiries@culture.gsi.gov.uk
www.gov.uk/dcms

11 December 2018

Dear Ingrid,

Paragraph 172 Notification: Tower of London World Heritage Site

In line with Paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, I write to inform you of a proposed development within the setting of the Tower of London World Heritage site.

The proposals are for the demolition of existing building and structures and construction of a building to a height of 305.3m for a mixed-use visitor attraction, including viewing areas, an education facility and restaurant/bar; together with a retail unit at ground floor, and a new two-storey pavilion building and a public roof garden.

Further documentation including Historic England's advice on the proposals can be found by searching:

<http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=makeComment&keyVal=PI6RTDFHKOR00>

A heritage impact assessment has been carried out, and is available via the link. Additional visualisations are available in the Design and Access Statement.

The statutory consultation expiry date is December 20th, with a determination deadline of March 11th.

Please do not hesitate to contact me with any further questions.

Kind regards,



Enid Williams
Senior Heritage Policy Adviser
Department for Digital Culture Media and Sport



United Nations
Educational, Scientific and
Cultural Organization

Organisation
des Nations Unies
pour l'éducation,
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Organización
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Организация
Объединенных Наций по
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منظمة الأمم المتحدة
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联合国教育、
科学及文化组织

Culture Sector World Heritage Centre

Ms Enid Williams
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100 Parliament Street
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United Kingdom of Great
Britain and Northern Ireland

Ref.: CLT/WHC/EUR/18/11352

20 December 2018

Subject: **State of Conservation of "Tower of London" World Heritage property**

Dear Ms Williams,

I wish to acknowledge with thanks receipt of your letter of 11 December last, by which you provided the World Heritage Centre with information related to the proposed development of a high-rise building for a mixed-use visitor attraction (project titled "The Tulip") within the setting of the World Heritage property "Tower of London", in accordance with paragraph 172 of the *Operational Guidelines*.

I have noted that a Heritage Impact Assessment has been conducted and is available in the link you provided. I have also noted that you have included Historic England's advice letter, concluding that the proposed building will reduce the visual dominance of the Tower of London and significantly harm an attribute of its Outstanding Universal Value of the property.

I advise that the overall impact of the proposed developments within the setting of the World Heritage property is assessed in an integrative approach considering the accumulative effect as a whole within setting of the property and their potential impact to its Outstanding Universal Value. I trust that this will be considered before any irreversible decision is taken.

Please note that we have forwarded the information received to ICOMOS and ICCROM for their information and review, and shall get back to you should ICOMOS have any comments.

Thanking you for your continuous collaboration and support in the implementation of the World Heritage Convention, I remain,

Yours sincerely,



Mechthild Rössler
Director

cc: Permanent Delegation of United Kingdom of Great Britain and Northern
Ireland to UNESCO
United Kingdom National Commission for UNESCO
ICOMOS
ICCROM

ICOMOS Technical Review

Property	Tower of London
State Party	United Kingdom of Great Britain and Northern Ireland
Property ID	488
Date inscription	1988
Criteria	(ii)(iv)
Project	A new major high-rise development project within the setting of the World Heritage property “Tower of London” (Land adjacent to 20 Bury Street, London EC3 5AX, Planning application ref: 18/01213/FULEIA)

On 14 December 2018, ICOMOS received information from the State Party, via the World Heritage Centre, concerning a high-rise development project named “The Tulip”, to be constructed within the setting of the World Heritage property. The Advisory Body provides its comments on the proposal below.

Background

The extraordinary rich built cultural heritage assets of Greater London are recognised and make this metropole unique with its four World Heritage properties. These properties, situated in a living and quickly-developing urban context, face significant and gradually stronger challenges to the protection and maintenance of their integrity, especially in terms of visual impact.

A number of Reactive Monitoring missions have taken place over the last decades (even over past recent years) which have highlighted processes that threaten World Heritage values. One of the latest missions in 2017 evaluated the alarming situation of another World Heritage property in London, that of the Palace of Westminster and Westminster Abbey including Saint Margaret’s Church. In its report, the Mission dealt not only with that one property, but raised general issues in the urban development context of Greater London - among others underlining general menaces such as the “cumulative effect” of already licensed high-rise buildings, and pointing out weak elements in the authorization system/process. All of those findings were and still are valid for the other World Heritage properties in London, including the Tower of London itself.

As it was correctly quoted in some of the documents available to download via the link submitted by the State Party (e.g. in the Heritage Impact Assessment), the Retrospective Statement of Outstanding Universal Value of the property Tower of London, in its section addressing management issues¹, already mention threats and challenges created by massive urban development in the very close vicinity of the World Heritage property,

¹ “Protection and management requirements... The most significant challenges to the property lie in managing the environs of the Tower of London so as to protect its Outstanding Universal Value and setting. At a strategic level, these challenges are recognised in the London Plan and the Boroughs’ emerging Local Plans. These documents set out a strategic framework of policies aimed at conserving, protecting and enhancing the Outstanding Universal Value of the Tower and its setting. The challenges are also identified in the World Heritage Site Management Plan, which defines the local setting of the Tower and key views within and from it. Objectives in the Plan to address the challenges are being implemented (for example, through a local setting study that informed understanding of the immediate setting of the property, and through work on the property’s attributes), although pressures remain significant, particularly in the wider setting. Discussions take place as part of the Management Plan review regarding how best to ensure continued protection of the Outstanding Universal Value of the property and its setting....”. Available at: <http://whc.unesco.org/en/list/488> (accessed March 2019)

and drew attention towards the possible negative visual impact of this process, if continued, on the property's integrity.

The proposed new development, a high-rise building – hereinafter named “The Tulip” – appeared in the above outlined context, as a new proposed “landmark” in the London City area. The submitted documents eloquently present the unique and high architectural value, as well as the social, economic, etc. benefits of the proposal, and argue that the new building will not be detrimental to the integrity of the World Heritage property.

Analysis

The present Technical Review will not address the architectural quality of the proposed building, which is certainly high, or at least exceptionally-striking, but focuses on its expected impact on the World Heritage property. First of all, it is necessary to underline that the current situation of the integrity of the property, in terms of visual impact, is already unsatisfactory, or even rather alarming, without the proposed new building, and, even more importantly, without the finalization of other high-rise buildings already licensed or under construction in the surrounding neighbourhood of the Tower of London.

An extract from the Statement of Outstanding Universal Value is quoted below:

Criterion (ii): A monument symbolic of royal power since the time of William the Conqueror, the Tower of London has served as an outstanding model throughout the kingdom since the end of the 11th century. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.

Criterion (iv): The White Tower is the example par excellence of the royal Norman castle from the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture.

Integrity

Il the key Norman and later buildings, surrounded by their defensive wall and moat, are within the property boundary. There are few threats to the property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded.

The Tower's landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave, all key aspects of its significance, have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription. Some of these have, to a degree, had an adverse impact on the views into, within and out of the property. [highlighted by ICOMOS]

The Tower's physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such development could limit the ability to perceive the Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river.

The Tulip development has been proposed in this very delicate context, as a new, additional element to the already over-dominating urban development pressure. Not only does the development propose an additional element, but, in some aspects, it goes beyond the already-stretched boundaries, namely with its height of more than 305 metres, and with its extremely strong and extravagant shaping that is diametrically opposite

to the traditional-historic appearance of the Tower ensemble. These qualities of the Tulip make it more predominant, consequently and definitely diminishing *“the Tower’s landmark siting and visual dominance on the edge of the River Thames”*. The unfortunate co-visibility (from inside and outside of the World Heritage property) of the old and the new creates a disillusioning sight, but the most negative effect is caused by the scale change - the Tulip, along with the already existing high-rise buildings, dwarfs the historic Tower. The carefully-designed “organic” form of the Tulip does not improve the situation, because of two reasons: it strengthens the accent of the new from one side and, in spite of its “floral character”, it is not only a “high-tech” building but also has a rather strong industrial architecture appearance.

The conclusions of the Heritage Impact Assessment (HIA) are not consistent with the information in the available documents, assessments and opinions. The HIA seems to have internal contradictions: determining that the intervention is significant in nature, while at the same time minimizing its expected impacts, and even evaluating them as slightly positive, implying that aspects related to heritage values have been understated. In any case, this can be seen as a serious signal that the methodology presented in the ICOMOS *Guidance on HIAs for Cultural World Heritage properties* (2011) (although quoted many times in the submitted HIA) should be further developed, in order to minimize the subjectivity of its application. Another issue is the weighting of the so called “benefit” factors – for society, economy, urban development strategy, and so on. Although these aspects are evidently important, they should not have priority over the preservation of attributes conveying the Outstanding Universal Value (OUV) of a World Heritage property.

It is also unclear why the documents reference a positive consultation with Historic England, which suggests that they have come to an agreement with the developers, when as far as ICOMOS is aware, Historic England had communicated a clear and strong position *against* this project.

Furthermore, ICOMOS advises that the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable approach to allow further negative visual impact on the property’s integrity when it is already threatened.

ICOMOS considers that a stricter and more appropriate evaluation of proposed construction projects that could have an impact on World Heritage properties has to be used, giving priority to the preservation of OUV.

This has already been precisely defined in the report of the above-mentioned 2017 Reactive Monitoring mission:

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 subjects 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 GLA. The GLA 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 UK 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.

Conclusions

On the basis of the analysis set out above, ICOMOS considers that the proposed development project (not classifying its architectural values) is not compatible with the preservation of the integrity of the World Heritage property of the Tower of London, and would therefore advise that the State Party:

- Abandon the Tulip development project;
- Adopt a stricter and more appropriate evaluation of proposed constructions that could have an impact on World Heritage properties, giving priority to the preservation of OUV, in line with previous mission recommendations.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.