

## ICOMOS Technical Review

Property	Tower of London
State Party	United Kingdom of Great Britain and Northern Ireland
Property Ref	488
Date of Inscription	1988
Criteria	(ii) (iv)
Subject	State Party's state of conservation report and information about various development projects in the property

### I. Introduction

On 19 December 2024, ICOMOS received, via the World Heritage Centre, the State Party's state of conservation report for the World Heritage property "Tower of London". Further information regarding various development projects at the property was then submitted on 28 February 2025, 1 April 2025 and 15 May 2025.

The Advisory Body provides its analysis on the submitted documentation below.

### II. Background

Since the property's inscription in 1988, ICOMOS has cautioned that development in the setting of the Tower of London World Heritage property can be detrimental to the maintenance of its Outstanding Universal Value (OUV). The ICOMOS evaluation report of the property's nomination file of the property namely reports the following:

*ICOMOS draws the Committee's attention to the inconsistent value of the surroundings of the Tower of London. Alongside certain remarkable and historically valuable elements, such as Tower Bridge, oversized buildings have increasingly been built in the Docks area.*

*The most regrettable one is the Tower Hotel, which seriously modifies the urban landscape in the St. Katherine's dock area and diminishes the monumental value of the Tower of London. ICOMOS expresses the wish that the Committee recommend that the United Kingdom authorities make strenuous efforts to protect the surroundings of the Tower of London in order to prevent any further abuse of this nature.<sup>1</sup>*

The World Heritage Committee Decision **12 COM XIV.A** recording the inscription also records that "*The Committee has expressed its regrets regarding the building of the Tower Hotel, which would have best been avoided, and took note of the assurances of the United Kingdom authorities as to protection henceforth to be granted to the environment of the Tower of London*".

ICOMOS' analysis of the proposed construction of the Minerva Tower and the London Bridge Tower in the setting of the property led the World Heritage Committee to recommend in 2003 that the State Party "*avoid any construction in the immediate vicinity of the property that could harm the setting and integrity of the property*" (Decision **27 COM 7B.83**), a request repeated in 2004 (Decision **28COM 15B.103**). In 2005, ICOMOS advised that "*the setting of the Tower needs to be defined and protected as a matter of urgency, given the pressure for new development in this part of London*".<sup>2</sup> The World Heritage Committee consequently recalled: "*the commitment of the State Party of the United Kingdom at the time of the inscription of the property in the World Heritage List, to enforce policies aiming at protecting the environment of the Tower and to apply restrictive covenants on new developments*" (Decision **29 COM 7B.89**).

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<sup>1</sup> Advisory Body Evaluation, ICOMOS (1988): <https://whc.unesco.org/document/153569>.

<sup>2</sup> State of conservation report (2005), <https://whc.unesco.org/en/soc/1349>

The State Party's report on the state of conservation of the property, submitted to the World Heritage Centre in 2006, reported the approval of the 306-metre Shard (then referred to as 'Shard of Glass') at London Bridge Station and the 217-metre Minerva Tower,<sup>3</sup> as well as new applications for the 324-metre Bishopsgate Tower, and the 209-metre 20 Fenchurch Street projects. In their analysis, presented in the state of conservation report tabled before the World Heritage Committee at its 30<sup>th</sup> session, the World Heritage Centre and ICOMOS concluded that they:

*consider that the impacts of the tall buildings already given approval and those subsequently submitted will have far greater than a "small adverse impact" on the Tower of London. If built, these buildings could confuse what remains of the Tower's silhouette.*

*In order to determine more precisely the impacts on views, both of the Tower and outwards from within its Inner Ward, a thorough skyline study should be commissioned to assess and document the setting of the Tower and the key views connected to its World Heritage status.*

*Any new development within London should aim to maintain or enhance the setting and critical views associated with the Tower, as well as the World Heritage property of Westminster Palace, Westminster Abbey and Saint Margaret's Church.<sup>4</sup>*

The World Heritage Committee expressed its "great concern that proposed new developments around the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church World Heritage properties, appear not to respect the significance of either World Heritage property, their settings and related vistas", and requested that in-depth skyline survey be undertaken "as soon as possible to provide a qualitative framework for assessing the impact of new development on views and setting that contribute to the outstanding universal value of the Tower". The World Heritage Committee also requested that the State Party invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property, including "to review the possibility of inclusion of the property in the List of World Heritage in Danger" (Decision **30 COM 7B.74**).

The conclusions of the mission, as presented in the state of conservation report tabled before the World Heritage Committee at its 31st session (2007), included a recommendation that:

*The Greater London Authority should adopt a policy of concentration of tall buildings in the City, thereby limiting the impact on the Tower of London's surrounding urban landscape. The mission was of the firm view that establishing a statutory protection for the iconic view from the South Bank, in order to keep the last remaining visual axis unobstructed, was key to the conservation of the visual integrity of the Tower. The proposal currently put forward in the London Plan (London View Management Framework – Draft SPG, April 2005), to identify three limited circles from a viewpoint from City Hall to the Tower of London, improves the situation, but should be widened considerably to include a buffer zone extending up to 1km from the Tower of London over the eastern section of the City of London into the Borough of Tower Hamlets.*

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<sup>3</sup> Cancelled the following year.

<sup>4</sup> <https://whc.unesco.org/en/soc/1193/>

The mission also concluded that:

*[...] the property would meet criteria for Danger Listing (according to Paragraphs 178-182 of the Operational Guidelines) if either a statutory protection for the iconic view from the South Bank towards the Tower, which is key to the conservation of the visual integrity of the Tower, has not been established by the time the World Heritage Committee meets for its 31st session, or the Management Plan, including a protection of the immediate surrounding of the Tower through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session. The statutory protection of the iconic view and the management plan could be considered the benchmarks also for a potential removal of the property from the List of World Heritage in Danger.<sup>5</sup>*

Furthermore, the mission report records that “On 16 March 2007 the State Party responded to the mission report and assured the World Heritage Centre of the UK’s commitment to the protection of the World Heritage property. A substantive response to the issues raised in the mission report will be available in time for the 31st session of the World Heritage Committee”. Consequently, this contributed to the World Heritage Committee’s taking 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, its setting and its vistas”. (Decision **31 COM 7B.90**).

Subsequent Committee Decisions in 2008 (Decision **32 COM 7B.112**), 2009 (Decision **33 COM 7B.127**) and 2011 (Decision **35 COM 7B.114**), focussed, amongst others, on the protection of the view of the property from the South Bank, developing and strengthening the legislative and regulatory environment as well as tools to assess and control high-rise development in the immediate setting and wider setting of the property. With Decision **33 COM 7B.127** (2009), the World Heritage Committee noted that, if the development control of the setting of the property was not improved, it would consider the possible inscription of the property on the List of World Heritage in Danger at its 35<sup>th</sup> session (2011).

Furthermore, in all its decisions between 2007 and 2009, the World Heritage Committee consistently requested that the State Party develop, define and submit a proposal for a buffer zone for the property.

A Reactive Monitoring mission visited the property again in 2011, upon the request of the World Heritage Committee’s Decision **35 COM 7B.114**. Its conclusions, as reported in the 2012 state of conservation report, informed the Committee’s Decision **36 COM 7B.91**, which encourages the State Party to, amongst others:

*b) Define specific measures, based on the definition of the setting of the property, to ensure the protection of the property and minimize its vulnerability to potential threats to its Outstanding Universal Value,*

*c) Regulate further build-up of the area surrounding the Shard of Glass building, ensuring that approved heights do not exceed a height whereby they would become visible above the on-site historic buildings.*

In its 2014 summary of the state of conservation report, the State Party noted that “the immediate setting of the property is considered to be well defined through the 2010 Tower of London Local Setting Study”, and that national frameworks require Environmental Impact Assessments (EIAs) for larger scale projects in sensitive areas. This mechanism will ensure the wider setting of the property.

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<sup>5</sup> <https://whc.unesco.org/en/soc/1031>

### **Recall of the retrospective Statement of Outstanding Universal Value (RSOUV)**

A retrospective Statement of Outstanding Universal Value (RSOUV) was submitted by the State Party and adopted by the Committee in Decision **37 COM 8E** (2013). The RSOUV clearly sets out the importance of the Tower's setting in supporting the OUV of the property, as shown in the extract 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**

*All 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 [emphasis added 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.*

### **Recall of recent ICOMOS recommendations contained in Technical Reviews of high-rise project proposals and related planning documents**

ICOMOS has in the recent past provided numerous Technical Reviews of individual project proposals that have been brought forward for high-rise buildings in the setting of the Tower of London World Heritage property and communicated to the World Heritage Centre since 2018 by the State Party, specifically:

#### **March 2019: Land adjacent to 20 Bury Street, London EC3 5AX, Planning application ref: 18/01213/FULEIA ('The Tulip', located in the City of London)**

ICOMOS's analysis contested the outcomes of the Heritage Impact Assessment (HIA) submitted for the project and highlighted 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.*

The Technical Review concluded that:

*On the basis of the analysis set out above, ICOMOS considers that the proposed development project ... 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.*

The project was denied by the State Party.

**July 2020: High-rise development project at 100-107 Leadenhall Street, London, EC3A 3BP - Application No. 18/00152/FULEIA ('The Diamond', located in the City of London)**

The reviewed material was submitted by the State Party in response to a paragraph 174 request from the World Heritage Centre, following receipt of third-party submissions after the project was granted planning approval in 2018.

In its review, ICOMOS noted that: *"First of all, it is necessary to underline that the current situation in the setting of the property is already not satisfactory (and might be considered to be rather alarming) without the proposed new building, and, even more importantly, without the completion of other high-rise buildings already licensed or under construction in the close neighbourhood of the Tower of London".*

ICOMOS also questioned the conclusions of the submitted HIA, which stated, as quoted in the aforementioned technical review, that: *"Although there would be change to the setting of the WHS there would be no harm to the relevant attributes of its OUV, and the change to the setting of the WHS is therefore judged overall to be, neither harmful nor beneficial, but neutral".* The HIA also included the conclusions that the new development would result in the consolidation of the skyline of the City's Eastern Cluster, which would result in it having *"its own distinct identity as a compact well composed form seen beyond the WHS and to the right of Tower Bridge. Although the magnitude of the effect would be increased the significance of the effect would not change in comparison to the Proposed Development assessed in isolation".*

ICOMOS waylaid this conclusion, asserting that *"Due to the proximity of the proposed construction to the World Heritage property, its height, and not least its mass form, it would certainly have a high negative visual impact",* and that *"Any further changes (additions) to the already existing setting of the Tower would only aggravate the current situation".*

ICOMOS thus advised the State Party to consider the following recommendations:

- *To make use of the findings and recommendations of previous Reactive Monitoring missions in connection with development in the setting of this World Heritage property;*
- *To reconsider this development project to ensure it does not impact on OUV and with the planning parameters;*
- *To undertake a stricter and more appropriate evaluations of any proposed development which could have the potential to impact on World Heritage and for these to be based on the priority being given to preserve OUV;*
- *To foster a more appropriate use of the HIA methodology;*
- *To reconsider the possibility to establish well-designed parameters for development within the setting of the property so that the same difficulties are not faced over and over again.*

**June 2022: High-rise development project at 4–26 St. Thomas Street, Southwark, London SE1 ('New City Court', south bank of the River Thames)**

Two applications for the redevelopment of New City Court were reviewed. The first (2018) proposed a 37-storey tower of 144 m height, while the second (2021) proposed a reduced-height 26-storey version at 108 m. In its Technical Review, ICOMOS stated that the 2018 proposal *"would be visible from within the Inner Ward of the Tower of London, above the roofline of the Grade I listed Queen's House,"* and *would create a significant cumulative effect that would further encroach on the Tower of London... harming the setting of the Queen's House and the Outstanding Universal Value (OUV) of the World Heritage property"*. ICOMOS determined that the project *"would generate an unacceptable impact on OUV"*.

Although the second, reduced scheme sought to address concerns raised by the local planning authority and Historic England, ICOMOS observed that it *"would nevertheless have considerable adverse impacts on assets of national importance and, overall, on the urban neighbourhood within which it is to be constructed"*. Critically, *"neither application was subject to a Heritage Impact Assessment (HIA) following the 2011 ICOMOS Guidance on HIAs for Cultural World Heritage Properties"*.

ICOMOS therefore recommended that the first (2018) proposal should not be approved and that the second proposal, though reduced in visual intrusion, remained of concern and should be evaluated in compliance with national and local policy frameworks, particularly concerning heritage.

**June 2022: High-rise development project at 31 Bury Street, London EC3A ('Bury House')**

The planning application proposed the demolition of the existing Bury House and the construction of a 48-storey tower (197.94m AOD) for mixed commercial use.

ICOMOS reviewed the application and concluded that the project *"would result in harm to the authenticity and integrity of the Outstanding Universal Value (OUV) of the Tower of London World Heritage property"*. The cumulative visual impact, together with existing and consented developments, was considered already *"severe"*, with the proposed development *"contrary to the Visual Management Guidance in the LVMF"* (London View Management Framework, adopted in 2012).

ICOMOS noted that *"the Tower must remain the dominant building, separated from the City and respected by new developments"*, but this project would further breach *"the clear view of the sky in the backdrop of the White Tower"*, an *"important attribute"* identified in the LVMF. Submissions from Historic Royal Palaces (HRP) and Historic England supported this view, the latter warning that the proposal *"would diminish the visual dominance of the Tower [...] and erode the appreciation of the Tower of London's strategic siting on the river set apart from the mercantile city."*

ICOMOS found that the proposal was *"not in accord with the Management Plan,"* and that *"public benefits from the proposal would not justify the granting of planning permission when weighed against the harm that would be caused to the setting of the Tower"*. ICOMOS reiterated the position it had taken in 2019 in relation to similar projects, affirming that *"the integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact [...] there is no room for additional challenges to it."*

Finally, ICOMOS advised that the State Party:

- Reconsider the development to ensure it does not impact OUV;
- Utilize findings of past Reactive Monitoring missions and prior Technical Reviews;
- Apply advanced visual tools to better assess kinetic impacts and spatial dynamics of development on the Tower's setting.

#### **August 2024: Revised high-rise development project at Bury Street ('Bury House resubmission')**

Following the refusal of the earlier application, a revised proposal was submitted in mid-2024 for a slightly shorter (44-storey) tower with a larger footprint. ICOMOS confirmed that the new scheme *"remains similar to that from the previous scheme"*, and as such, *"comments in its Technical Review of the previous scheme for the site remain relevant"*. In particular, ICOMOS stated that *"ICOMOS fully supports Historic England's analysis of the potential impact on OUV of the revised Bury House scheme and recommends that it should also be refused permission"*.

ICOMOS expressed concern that the recurring re-submission of tall building proposals at this location highlights *"the urgent need for a more clearly defined framework to protect the setting of the property – which itself also needs defining"*. The Technical Review cited the World Heritage Committee's long-standing concern, stating that *"there is no agreed methodology for defining the extent of the wider setting [...] and no visual parameters to assess impact"*. Without such mechanisms, *"there appears to be no means of halting the submission or re-submission of proposals for tall buildings that will have a highly negative impact on OUV"*.

ICOMOS concluded that the application should be refused and emphasized the importance of recognizing *"the highly negative impacts on Outstanding Universal Value of the revised Bury House scheme [...] in the planning processes"*.

These planning applications were refused.

#### **October 2024: Strategic planning review of City Plan 2040**

In May 2024, ICOMOS was notified of the draft City Plan 2040 by the State Party. This plan envisions delivering a minimum of 1.2 million square meters of new office floorspace in the form of tall buildings, primarily in designated clusters, including the area adjacent to the Tower of London. In its Technical Review of October 2024, ICOMOS raised serious concerns that the Plan *"appears to be lessening constraints on the setting of the property rather than respecting the need for its protection"*.

ICOMOS found that *"heritage is only included in one of its 15 stated policies"*, and even then, it shares a chapter with tall buildings, while offices receive a separate and prioritized chapter. It observed that the HIA undertaken for the plan was 'post hoc justification' and not a proactive tool to mitigate harm. The HIA's conclusion that development *"would raise no concerns"* was rejected by ICOMOS. The principle included in the HIA's conclusion that *"the consolidation of the existing and emerging form into the Proposed City Cluster is beneficial"* had already been rejected by ICOMOS in its 2020 Technical Review of the project for 100-107 Leadenhall Street, London ('The Diamond').

ICOMOS also noted that the City Plan 2040 failed to reflect the repeated recommendations of the World Heritage Committee concerning cumulative visual harm.

In line with concerns raised by Historic England, ICOMOS emphasized that the Plan *"would entail severe harm to the Outstanding Universal Value of the Tower of London World Heritage Site"*, and that its implementation *"would have the capacity to present a clear potential danger to the property"*.

ICOMOS therefore concluded stating that it considers that:

- *A drastic revision of the draft City Plan is required that considers other development alternatives which respect the setting of the Tower of London in relation to its support for Outstanding Universal Value.*
- *To this end, it remains essential for an appropriate and sustainable buffer zone/definitive setting to be defined, including enhancement of associated views to and from the Tower, for adoption by the World Heritage Committee, and for this to form an integral part of the City Plan.*

### **June 2025: 85 Gracechurch Street, 63 St Mary Axe and New London House**

ICOMOS has provided extensive and consistent advice to the project at Gracechurch Street in 2023, 2024 and 2025 that the proposal would harm the Outstanding Universal Value of the property. ICOMOS in June 2025 provided comments on the 85 Gracechurch Street and 63 St Mary Axe proposals concluding that it generally agrees with the concerns raised by Historic England. However, it noted that the implications of cumulative impact of the two projects on the property's OUV remain unclear.

ICOMOS further noted that while the State Party reaffirms the 2007 World Heritage Committee recommendation to cluster tall buildings to mitigate cumulative impact, Historic England's comments on these proposals do not indicate whether this principle has been followed or where such guidance is defined.

Moreover, ICOMOS considered that it was unclear how cumulative impact is addressed within the Planning Committees' remit. ICOMOS recommended that the State Party undertake a formal cumulative impact assessment to clarify responsibilities and ensure consistent application of heritage protection measures.

On the New London House project, ICOMOS supports Historic England's position on this proposal that *the proposals would cause some harm to the ability to appreciate the significance of the Tower of London World Heritage Site, including attributes of its Outstanding Universal Value (OUV) but that this harm could be minimised through relatively minor design changes, particularly by reviewing the proposed cladding so that the building would appear closer in character to existing cluster buildings.*

ICOMOS however questioned how Historic England's position of not objecting to the proposal could be expected to prompt revisions to the scheme. Further clarity on this mechanism would be welcome.

### **State Party submission and request for review**

The State Party's 2024 state of conservation report included notification of the following:

#### ***1. Moat Landscape Project***

Historic Royal Palaces (HRP) is progressing with a project to improve the moat landscape surrounding the Tower. This forms part of wider conservation-led enhancements intended to reinforce the Outstanding Universal Value of the property by improving visitor experience and the physical setting of the Tower. The project is aligned with the WHS Management objectives and reflects a strategic approach to setting-based interventions.

#### ***2. Tower Entry Project***

Historic Royal Palaces is also developing a Tower Entry Project aimed at enhancing access, orientation, and visitor management at the principal entrance to the Tower. This initiative aims to reduce congestion and enhance legibility of the property's historic layout.

#### ***3. World Heritage Site Management Plan (Spring/Summer 2025)***

A comprehensive review and update of the Tower of London WHS Management Plan is underway, led by Historic Royal Palaces. The revised Plan is scheduled for completion in spring/summer 2025. It will integrate updated guidance, including UNESCO's 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context*, and provide new frameworks for assessing cumulative impacts and managing change in the setting of the property.

#### ***4. London View Management Framework (Spring 2025)***

The Greater London Authority (GLA) is currently reviewing the existing London View Management Framework (LVMF), which informs visual impact assessments for strategic views of the Tower. The revised LVMF - anticipated for consultation in spring/summer 2025 - will re-examine the protection of the Tower's silhouette and views, including potential enhancements to visual management policies and assessment parameters.



### *5. London Plan (2025)*

A new London Plan is under development, expected for adoption by 2027. Early consultation has commenced, and the State Party affirms that Historic England is engaged to ensure the positive heritage protections of the current Plan are retained or strengthened in the new version.

### *6. Tower Hamlets Council Draft Local Plan*

The London Borough of Tower Hamlets is reviewing its Local Plan, with a Regulation 19 draft consulted upon in October 2024. Historic England has raised concerns about the absence of a HIA and has questioned the draft plan's soundness. However, constructive dialogue is ongoing, and Tower Hamlets has engaged Historic England to develop a brief for the required HIA, which will address potential impacts on the Tower's OUV.

On 28 February 2025, the State Party submitted a Paragraph 172 Notification in which it provides an update on the status of the applications for:

- The Mark, for which the ICOMOS Technical Review was shared with the local planning authority;
- 70 Grace Church Street project was approved before the receipt of the ICOMOS Technical Review, subject, amongst others, the final decision of the Mayor of London and the possibility for the Secretary of State to call in the application for review;<sup>6</sup>
- Bury House, which the Sub-Committee have decided to deny;
- 1 Undershaft (309.6m tall), for which planning permission was granted on 13 December 2024, conditional to the final decision of the Mayor of London and the possibility for the Secretary of State to call in the application for review;<sup>7</sup>
- 60 Grace Church Street, for which planning permission was granted;
- Royal Mint Court, for which the Public Inquiry had already closed.

On 1 April 2025, the State Party submitted a Paragraph 172 Notification to the World Heritage Centre regarding the City Plan 2040, City of London. This update followed the initial State Party's submission made on 21 May 2024 and subsequent ICOMOS Technical Review in October 2024. The State Party confirmed that the Planning Inspectorate has commenced Examination in Public hearings as of 25 March 2025, and that Historic England and other stakeholders have submitted statements on the key matters under review. The City of London Corporation was preparing addenda to the Strategic Views and Heritage Impact Assessments, addressing proposed changes to tall building contour lines within the City Cluster. The State Party communicated that it expected publication of the agenda in mid-April 2025, and that the related hearings would be scheduled for 10–11 June 2025. The State Party reiterated its commitment to keep the World Heritage Centre informed, but stated that it was not at the time requesting any comment from the World Heritage Centre or the Advisory Bodies.

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<sup>6</sup> Planning Applications Sub-Committee, hearing date 11 February 2025, <https://democracy.cityoflondon.gov.uk/documents/s215596/70%20Gracechurch%20Street%20Committee%20Report%203%201%201.pdf>

<sup>7</sup> Planning Applications Sub-Committee, hearing date 13 December 2024, <https://democracy.cityoflondon.gov.uk/documents/s214500/PASC%20Draft%20Minutes%2013-12-2024%20-%20Confirmed%20Final%20Version.pdf>

Subsequently, on 15 May 2025, the State Party submitted a further Paragraph 172 Notification to the World Heritage Centre regarding the City Plan 2040, City of London, following its previous communication of 1 April 2025. This update concerned the publication of additional documentation submitted for consideration during the Examination in Public, specifically an addendum to the previously submitted Strategic Views Assessment and Heritage Impact Assessment. The new material includes Revised Policies Maps C and E and a four-part evidence base addendum related to the City's Tall Buildings Policy. The State Party invited any additional comments from ICOMOS by 1 June 2025 to help inform the Planning Inspectorate's Examination, ahead of the scheduled Heritage and Tall Buildings hearing sessions on 10–12 June 2025.<sup>8</sup> It also noted that Historic England is currently reviewing the new documentation. In its letter, the State Party provided web-links to an extensive number of documents made public on the City of London's website, which include the May 2025 Historic England hearing Statement Addendum (uploaded on 3 June 2025).<sup>9</sup> This website also indicates that the dates for the hearing sessions referred to in the letter from the State Party were already made public on 22 January 2025.

### III. Analysis

#### City Plan 2040, City of London

ICOMOS has already communicated its review of the draft City Plan 2040, City of London in its Technical Review of October 2024, advising that a drastic revision of the draft City Plan is required if further irreparable damage to the setting of the Tower of London, and therefore to its OUV, is to be avoided.

In response to the further additional/revised documents that were submitted on 15 May 2025 in response to submissions made in 2024, ICOMOS provides the following advisory points, responding in particular to the Addendum on the Strategic Views Assessment and Heritage Impact Assessment:

- The submitted material does not provide any further evidence of a meaningful attempt to avoid or reduce the severity or scale of the potential damage to the setting of the Tower of London World Heritage property.
- The submitted annex continues the erroneous perspective that the harm of the existing increase in tall buildings can be reduced, by building more tall building to 'filling out' (referred to as 'consolidation' in the HIA for the 100-107 Leadenhall Street project) the contour line' of their profile, including by providing so-called 'foothills' in deference of the World Heritage property (p. 6). This argument is also based on an acceptance of the status quo as baseline, including already granted, but not constructed tall buildings in the City Cluster, with at its peak the 1 Undershaft project, approved on 13 December 2024. This approach results in a skewed assessment, that does not include the cumulative negative impacts of tall building constructions in the cluster since the time of inscription.
- The World Heritage Committee in Decision **36 COM 7B.91** specifically took the view that it was necessary to ensure that *"approved heights do not exceed a height whereby they would become visible above the on-site historic buildings"*. It is therefore entirely inappropriate to the maintenance of the OUV of the property to allow for the further development of the cluster as illustrated in View 36 (p. 95 of the submitted Addendum).

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<sup>8</sup> The Committee in Decision **38 Com 7B. 35** specifically requested that the State Party ensure 'that adequate time be allowed for thorough review of each project by the Advisory Bodies before any decision is taken' with regards to paragraph 172 Notifications.

<sup>9</sup> The document is available at : <https://www.cityoflondon.gov.uk/assets/Services-Environment/MM7-R006-Historic-England-Hearing-Statement-Addendum.pdf>.

ICOMOS is in full agreement with Historic England's May 2025 submission to the Public Hearing, which considers the four new documents detailing proposed amendments to the City Corporation's tall buildings policy and contour lines as set out at Regulation 19 stage. Historic England concludes that these do not meet the City Corporation's objective to "*minimise the possibility of harm to the settings and OUV/significance of the three Strategic Landmarks; the Tower of London, St Paul's Cathedral and the Monument*".

ICOMOS notes that the City's quoted intention in Historic England's response is to 'minimise the possibility of harm',<sup>10</sup> which is not the same as to avoid the possible harm.<sup>11</sup> Therefore, this stated aim cannot be seen as aligned with the State Party's commitments under Articles 4 and 5 of the World Heritage Convention.

Moreover, the lack of precision in assessing measures to minimize the possibility of harm in the absence of policies that commit to protecting World Heritage properties and their settings, and of defined settings, is only too clearly reflected in the difficulties that Historic England has in ensuring their views are respected by Planning Committees. Unfortunately, the need for these fundamental tools has not been considered.

In summary, ICOMOS considers that the individual and cumulative impacts of the building volumes presented in the Strategic Views Assessment and Heritage Impact Assessment/City Plan 2040 have not yet been adequately assessed with regard to their impact on the Outstanding Universal Value of the Tower of London World Heritage property. The already extant high-rise buildings have already resulted in negative impacts on the property's OUV, and those accommodated in this plan, if executed, will result in substantial harm to the Outstanding Universal Value of the property.

#### **IV. Recommendations**

ICOMOS, reiterating its consideration contained in the October 2024 Technical Review of the London City Plan 2040, would advise that:

- The draft City Plan 2040 undergo a drastic revision to consider other development alternatives that respect the setting of the Tower of London in relation to its support of the Outstanding Universal Value;
- To this end, it remains essential for an appropriate and sustainable buffer zone/definitive setting to be defined, including enhancement of associated views to and from the Tower, for adoption by the World Heritage Committee, and for this to form an integral part of the City Plan.

ICOMOS further advises that the State Party call in the approvals of the 1 Undershaft, and 70 Gracechurch Street project as provided for under Section 77 of the Town and Country Planning Act 1990 for reconsideration with regard to their potential negative impact on the Outstanding Universal Value of the World Heritage property, also in light of Section 102 of the Levelling Up and Regeneration Bill, which establishes a statutory duty to give special regard to the desirability of preserving or enhancing a World Heritage property or its setting when exercising planning functions.

In this regard, the reference in the Levelling Up and Regeneration Act to the 'desirability of preserving or enhancing' World Heritage properties or their settings, while helpful, may fall short of the obligation under Article 4 of the World Heritage Convention to protect such properties to the utmost of the State Party's resources. There is a need for greater clarity on how domestic planning processes incorporate

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<sup>10</sup> Historic England, 2025 (May), *Examination of City of London Local Plan Historic England, Hearing Statement Addendum*, p. 2. Retrieved from <https://www.cityoflondon.gov.uk/services/planning/planning-policy/city-plan-2040-examination-in-public/city-plan-2040-examination-documents>.

<sup>11</sup> City of London Tall Buildings Policy, Evidence Based Addendum (ED-HTB36), para 1.6.

the Committee's determination of potential impact on OUV, as recent decisions suggest these are not always respected. The increasing number of high-rise buildings in the setting of several World Heritage properties in London continues to raise concern. This trend poses a potential threat to their OUV, including that of the Tower of London, and appears to reflect persistent challenges in effectively managing and controlling such developments under current legal and planning frameworks.

ICOMOS reiterates its position that the approvals of 1 Undershaft and 70 Gracechurch Street, as well as the polices of the City Plan 2040, are in direct contradiction with the need to sustain the Outstanding Universal Value of the Tower of London World Heritage property, and, if implemented, would have the capacity to present a clear potential danger to the property.<sup>12</sup> ICOMOS reiterates its conclusion that, although it understands the need for economic development, it considers that the current draft City Plan 2040 cannot be said to fully respect sustainable development.

ICOMOS further advises that appropriate and timely notification to the World Heritage Centre would be appropriate for the following:

- Moat Landscape Project;
- Tower Entry Project;
- World Heritage Site Management Plan (spring/summer 2025);
- London View Management Framework (spring 2025);
- London Plan (2025);
- Tower Hamlets Council draft Local Plan.

Notification should be done once the State Party has progressed with these proposals and draft plans and polices to a level where the review of their consequence for the protection and maintenance of the Outstanding Universal Value of the property would be useful.

Such notifications should take place well before any formal time-limited decision-making processes are initiated, to ensure that: "adequate time be allowed for thorough review of each project by the Advisory Bodies before any decision is taken" as requested by the World Heritage Committee in Decision **38 COM 7B.35** (2014).

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

ICOMOS, Charenton-le-Pont  
June 2025

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<sup>12</sup> Refer to Paragraph 179 of the *Operational Guidelines*.