

**London World Heritage Sites - Guidance on Settings SPG
Statement of Consultation**

Respondent	WHS SPG Reference	Comment	GLA Response	Amendments
Braeburn Estates Ltd Partnership	General	SPG needs to be consistent with PPS5, EH Setting Guidance and Seeing The History in the View, as well as the LVMF, particularly in respect of terminology and definitions.	Noted	The final SPG has been amended to ensure consistency
Braeburn Estates Ltd Partnership	General	Agree with Mayor's view that how we manage this dynamic juxtaposition that respects the past but welcomes the future, will be a mark of London success as a World Class City.	Noted	No Change
Braeburn Estates Ltd Partnership	Chapter 4 - Character	Inconsistent in terminology with terminology in PPS5 - OUV, character and special character	Noted, although terminology should be consistent with London Plan policies as this SPG is guidance on the implementation of London Plan.	Remove 'special' character
Braeburn Estates Ltd Partnership	Chapter 4 - Character	Unclear how local character can relate to character of World Heritage Site. Setting may comprise very wide area and the character of local area may have no relevance to OUV of World Heritage Site.	Agree	Amend - Clarification on responding to character
Braeburn Estates Ltd Partnership	General	Given weight attached to WHS management plans, it is important they are subject to a prescribed and comprehensive programme of consultation. This SPG could usefully set out framework and criteria for such an approach.	The relative weight to be attached to WHS management plans are set out in Circular 07/2009. Whilst they should be prepared in a participatory manner and are required to be publicly consulted upon, as per the Circular, the form this takes will depend on the management regimes and local circumstances of the individual sites. The SPG can not therefore prescribe the exact form this should take but only encourage it to happen.	No Change

Braeburn Estates Ltd Partnership	General	The SPG could usefully set out and clarify how the many elements and aspects that comprise OUV relate to the development plan process	The identification of attributes of OUV by the World Heritage Site steering groups and consultative committees will do this. Chapter 5 also sets out a process for how issues around settings of World Heritage Sites should be taken into account in the development process.	No Change
Braeburn Estates Ltd Partnership	Chapter 5	Reference to consideration of other heritage assets is not clear nor is the relationship of such an exercise with other heritage analysis.	Noted	Amend - Clarification of Section 5
Braeburn Estates Ltd Partnership	Chapter 5	The suggested scale at Para 5.29 should be omitted.	The scale is taken from UNESCO's guidance on Heritage Impact Assessments and has been reified by English Heritage as being appropriate to use.	No Change
Canary Wharf Group	Chapter 4 - Character	Inconsistent in terminology with terminology in PPS5 - OUV, character and special character	Noted, although terminology should be consistent with London Plan policies as this SPG is guidance on the implementation of London Plan policies.	Remove 'special' character
Canary Wharf Group	Chapter4 - Character	Unclear how local character can relate to character of World Heritage Site. Setting may comprise very wide area and the character of local area may have no relevance to OUV of World Heritage Site.	Agree	Amend - Clarification on responding to character
Canary Wharf Group	General	The SPG could usefully set out and clarify how the many elements and aspects that comprise OUV relate to the development plan process	The identification of attributes of OUV by the World Heritage Site steering groups and consultative committees will do this. Chapter 5 also sets out a process for how issues around settings of World Heritage Sites should be taken into account in the development process.	No Change

Canary Wharf Group	Chapter 4 - Views	Reference to Canary Wharf - this relationship is acknowledged in positively reinforcing the distinctiveness of the WHS in the LVMF and is welcomed. There is a need to ensure the wording is consistent with the wording the LVMF	Noted - Agreed	Amend - ensure both LVMF and WHS SPG wording is consistent
City of London	General	Support draft SPG. Welcomes priority given to need to improve approaches to WHS. Welcomes the assessment framework as mechanism for ensuring consistent protection of OUV.	Noted	No Change
City of London	General	Supports emphasis given to the need to deliver enhancements to OUV and potential use of S106 and CIL - however proposed OUV enhancements will need to be prioritised in context of other claims for planning obligations and CIL funds.	Noted	No Change
City of London	General	Welcomes draft SPG's support for use of WHS consultative committees.	Noted	No Change
City of London	Chapter 4 - Elements of Setting: Character	More cross references to existing character would be helpful. Under scale - it could be pointed out that the size of elements mentioned relative to their context has changed since built - and this is a normal part of location in a dynamic city.	Noted	Amend
City of London	Chapter 4 - Elements of Setting: Routes	Large parts of this focuses on views rather than approaches. Eg EH guidance on view is mentioned here but not in views section. More guidance on the importance of improving character of approach routes would be helpful.	Noted	Amend Text
City of London	Chapter 4 - Elements of Setting: Day and Night Considerations	Case Study box - this issue has been considered in all proposals for tall buildings within City Eastern Cluster and will continue to be in the future.	Noted	No Change

City of London	Chapter 4 - Elements of Setting: Safety and Security	EH guidance on temporary structures in historic places could be mentioned here.	Noted	Amend Text
City of London	Chapter 6	Under list of Local Authorities - Lewisham should be removed as this is included as an error.	This list is all authorities which may have development which affect the setting of World Heritage Sites. This includes those which may or may not sit on the World Heritage Site steering groups and consultative committees.	Amend text to clarify
City of London	Appendix 2: Guidance for Assessing Value of Heritage Assets	The distinction made in table between 'historic (unlisted)' buildings and locally listed buildings is inconsistent with Gov guidance in PPS5 - buildings should be treated the same. City does not have any locally listed buildings and suggests a consistent approach recognising both categories as heritage of medium significance.	Noted and have taken English Heritage's advice on the interpretation of UNESCO's guidance	Amend Text

City of Westminster	Chapter 3	<p>Object to the statement that the Mayor does not feel designation of a buffer zone is useful. The feasibility of establishing a buffer zone is an objective in the Westminster WHS management plan. This SPG should not pre-empt this decision.</p>	<p>The SPG does not stop the designation of a buffer zone if it was deemed appropriate. The SPG simply sets out the Mayor's view, which is consistent with English Heritage's that a buffer zone is not always the most useful mechanism. As part of the Westminster WHS Steering Group, the Mayor will work with other members of the steering group to assess the feasibility of establishing a buffer zone, which will include whether a buffer zone is the most appropriate mechanism in this case or whether there are other tools which may be more suitable. The Mayor's view does not pre-empt any of this work.</p>	<p>Amend to clarify this point.</p>
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City of Westminster	Chapter 4	Object to paragraph 4.4 about why it is not desirable to map out the wider setting. It is unfortunate the GLA does not support this approach as the GLA would be unique placed to help with such work.	As the SPG makes clear, an understanding of the contribution the setting makes to the OUV of the WHS is crucial and the Mayor as a member of the WHS steering groups will work with others to help define the settings, through an understanding of how the elements of setting contribute to the OUV. Whilst it a line on a map could be drawn for the immediate setting, this should be supplemented as this does not fully explain the interrelationship between the WHS's surroundings and the significance of the sites. Also for the wider setting, this would not be appropriate as it include any area that a site might have an effect.	Amend intro to Chapter 3 to clarify.
City of Westminster	Chapter 5	There is too much focus on assess design of development rather the extent to which an area can accommodate change.	Noted	Amend
City of Westminster	Chapter 2	Do not agree that there is too much focus in local policy on visual issues. These are usually the primary consideration and should be given significant weight.	The statement was to highlight that there are other issues in term of understanding the contribution of setting which are more than visual, however agree visual impacts are important.	Amend to clarify this point.
Darwin Landscape Laboratory	General	Please make appropriate reference to Darwin's Landscape Laboratory - nomination papers, management plan and proposed SOUV.	Noted	Amend document accordingly
Darwin Landscape Laboratory	General	Natural heritage and biodiversity is understated throughout the document.	Noted	Amend document accordingly

Darwin Landscape Laboratory	Chapter 2	Policy 7.10 C should not confine significance of WHS as being historic. Their significance is not just because they are old but because they have significance now and for the future.	Policy 7.10 is London Plan policy which was examined as part of the London Plan EiP in 2010.	No Change
Darwin Landscape Laboratory	Chapter 2	The Tentative List could be included on page 8 and described on page 9.	Noted.	Amend - include references in relevant places
Darwin Landscape Laboratory	Sources of Information	Include reference to DDL website	Noted	Amend
Darwin Landscape Laboratory	Chapter 4 - River Thames	The River Thames should be separated out from landscape and topography.	Noted	Amend
Darwin Landscape Laboratory	Chapter 4 - Landscape	Include references to biodiversity	Noted	Amend
Darwin Landscape Laboratory	Chapter 4 - Associations	Scientific association should be added to this element.	Noted	Amend
Design for London	Introduction	Add There are 'currently' four World Heritage Sites	Noted	Amend
Design for London	Introduction	Include second intention for SPG of ensuring sustaining World Heritage Site status for each of London's existing World Heritage Sites	This is implicit both in London Plan Policy 7.10 and throughout the SPG.	No Change
Design for London	Chapter 2	Policy context is comprehensive and includes reference that all future reviews and compilations of OAPFs should promote the enhancement of the settings of WHS. This is strongly endorsed.	Noted	No Change
Design for London	Chapter 4	The avoidance of over-reliance on maps is good, though this must be accompanied by a very thorough understanding and appreciation of the elements of setting.	Noted and agree. The SPG makes this clear.	No Change

Design for London	Chapter 4	Is there a mechanism to ensure relevant bodies fully appreciate the OUV of WHS and incorporate into plans and strategies.	Yes - as the SPG sets out, Circular 07/2009 states that LPA should have relevant policies in their plans and strategies that sustain the OUV of World Heritage Sites. London Plan Policy 7.10 also clearly states that LDFs should contain policies that protect, promote, interpret and conserve the OUV of World Heritage Sites.	No Change
Design for London	Chapter 4	Para 4.6 should clearly emphasis the need for development proposals to be considered with respect to their settings at the earliest possible stage.	Noted	Amend
Design for London	Chapter 4 - Context	Para 4.10 should be strengthened. Suggest adding "Developments in OAs which have an adverse effect on a WHS OUV will not be accepted."	This goes much further than the policy 7.10 and is not consistent with PPS5 which states that there may be need to balance harm against benefit.	No Change
Design for London	Chapter 4 - Character	Para 4.11- suggest modifying as sometimes traditional design may also be an appropriate design response. Add rooflines.	Noted.	Amend
Design for London	Chapter 4 - River Thames	Suggest renaming to "Relationship with River Thames"	Noted	Amend
Design for London	Chapter 4	Would be better to use examples from all 4 sites	This may run the risk that a detailed assessment of setting for each of the WHS has been undertaken and that the case studies identified are the full range of issues to be considered under each element of setting. This is not the case.	Amend to include 2 case studies for each element of setting to ensure more consistency for the elements of setting
Design for London	Chapter 4 - views	Should strengthen Para about impact of OAs. Bulk should be added to the criteria.	The criteria relates to criteria in Policy 7.7.	No Change

Design for London	Chapter 4 - public realm	Add street furniture to implementation point. Add new lighting, street furniture and paving to text. Add reference to retaining historic features where possible. Add reference to TfL guidance	Noted	Amend
Design for London	Chapter 4 - public realm	Planting trees or other soft landscape is not always appropriate.	Noted	Amend
Design for London	Chapter 4 - Views	Suggest adding a sentence that views of, into, within and out of a WHS must be maintained and this requirement must be taken into account by planners and developers.	The suggestion is more prescriptive than London Plan Policy. The text in Para reflects the appropriate policy response.	The text has been amended to clarify the role of WHS mgt plans, DPDs and other relevant strategies in indentifying mportant views.
Design for London	Chapter 4 - Arrivals	Suggest addition of text - reduction of redundant street furniture	Agree	Amend
Design for London	Chapter 4 - Day and Night	Implementation Point - add that it is also highly unsustainable to light empty offices at night.	Noted	Amend
Design for London	Chapter 4 - Other Environmental Factors	Should also mention air traffic - particularly at Kew as this has a detrimental effect of enjoyment of the site. Can we re-iterate the desirability of reducing volumes of traffic through the World Heritage Sites by traffic management schemes.	Noted	Amend
Design for London	Chapter 5 -	Para 5.10 add Local Listed Buildings, Registered Parks & Gardens, Schedule Monuments - these need to be spelt out. Para 518 - add microclimate	Noted	Amend
Design for London	Chapter 5	Need to add ref to physical capacity of an area. Add new text related to direct / indirect impacts	Noted	Amend
Design for London	Chapter 5	Public benefits very difficult to define and would potentially allow inappropriate development based on potentially unfounded public interest justifications.	Both the draft NPPF, PPS5 and ICOMOS guidance state that public benefit should be balanced against harm and that the relative weight attached should be proportionate to the significance of the assets. In the case of WHS, this is the highest significance.	Amend text to be explicit about harm to WHS being wholly exceptional.

Design for London	Chapter 6	Add ref to national or regional amenity, environmental or heritage groups - National Trust, The Victorian Society or London and Garden Parks. Also individual stakeholders.	Noted	Amend
Elizabeth House Limited Partnership	General	SPG provides a very helpful tool for understanding policies and guidance related to World Heritage Sites and proposes sensible methodology for assessing impact of new development.	Noted	No Change
English Heritage	General	Its important that the process of assessing setting of a WHS is from a point of understanding OUV and then establishing the contribution of made by its setting. Would then be consistent with EH's Setting Guidance	Noted	Amend
English Heritage	General	Important to recognise that each WHS is unique and contains a range of heritage assets that should be recognised individually as well as contributors to OUV of the WHS as a whole.	Noted	Amend
English Heritage	Chapter 4	Details of the Elements of Setting should be expanded more to reflect the breath and depth of details in EH's Setting's Guidance	Noted	Amend
English Heritage	Chapter 5	Assessment Framework is weighted towards consideration of development proposals with no clear reference to plan making.	Noted	Amend
English Heritage	Chapter 5	Assessment Framework is not consistent with EH Setting Guidance in that it should identity those elements of setting that make a positive, negative and neutral contribution to the setting of WHS to enable identification of potential adverse impacts as well as opportunities for enhancement. Also need to ref that the contribution of setting to the significance of WHS does not depend on their being public rights of access.		

English Heritage	General	It should be noted that PPS5 and draft NPPF state that substantial harm to a heritage asset of the highest significance would be wholly exceptional. These includes any element of setting of the World Heritage Site that contributes to its significance.	Noted	Amend
English Heritage	General	Suggest that the role and responsibility of identifying the setting of WHSs lies not just with the steering groups and consultative committees, but also with all stakeholders who, through their activities, have an impact upon the setting of WHSs. This includes decision makers, consultees, developers and the public.	Noted	Amend
English Heritage	General	Support principle of the SPG in setting a consistent approach to identifying and managing the setting of the WHSs. However it is essential that the SPG is not process focused only and robustly highlights that each of the WHSs have unique characteristics which are expressed in their OUV, and that their settings make an invaluable contribution to their OUV. It should be clear in its purpose of seeking to manage that setting so that the contribution it makes to the WHSs OUV, integrity, authenticity, and significance is not harmed by inappropriate development.	Noted	Amend
English Heritage	Chapter 2	Need to include reference to other policy documents (ICOMOS Guidance on HIA, PPS5 Practice Note, Site Allocation Documents. Grammar changes and updates.	Noted	Amend
English Heritage	Chapter 2	Welcomes reference to OAPFs - suggests some textual changes	Noted - use some of the suggestions	Amend
English Heritage	Chapter 3	Note that text list general attributes. Advise that EH is encouraging specific attributes for each site. This needs to be made clear.	Noted	Amend
English Heritage	Chapter 3	Suggested textual changes for consistency with UNESCO Operational Guidelines.	Noted	Amend

English Heritage	Chapter 3	Para 3.15 - Suggest is reviewed with the intention of expressing that all WHSs have an immediate and extended setting, and where a buffer zone is mapped this could be construed as being synonymous with the immediate setting. This approach of phrasing the relationship between immediate, wider setting and buffer zones offers greater simplicity.	Noted	Amend
English Heritage	Chapter 4	Under each element of setting, a case study for each WHS should be used.	This may run the risk that a detailed assessment of setting for each of the WHS has been undertaken and that the case studies identified are the full range of issues to be considered under each element of setting. This is not the case.	Amend to use 2 case studies per element of setting to illustrate points.
English Heritage	Chapter 4	plans have helped to inform the extent of the WHS's settings, but further work related to the attributes of the SOUV may uncover additional details that help clarify the extent of setting for each WHS. Also it is important to promote early engagement with key stakeholders	Noted	Amend
English Heritage	Chapter 4 - Context	Impl 1 - expand so that the integrity, authenticity and significance of WHS is thoroughly understood as well as their OUV.	Noted	Amend
English Heritage	Chapter 4 - Context	Suggested textual changes - ref to OAs	Noted	Amend - some of suggestions.
English Heritage	Chapter 4 - Context	Important to ensure development responds positively to its local context and the significance of the WHS. Key principle is that the character of the WHS should be established first, followed then by the character of the setting of the WHS that contributes to the OUV of the WHS. This approach demonstrates a clear relationship between the character of the WHS and its surroundings which is not necessarily articulated clearly in the text.	Noted	Amend

English Heritage	Chapter 4 - Character	suggested textual changes. Massing - Suggested textual changes. Scale - important to take account of	Noted	Amend
English Heritage	Chapter 4 - Landscape	Last sentence supporting planting of tree to screen past mistakes is not an approach we support. Also add sign post to London Plan Policy 2.18 and ref to Thames Landscape Strategy.	Noted	Amend
English Heritage	Chapter 4 - Views	Important to recognise WHS views cross borough boundaries and will require co-operation and different form of management. Should also reference English Heritage guidance on Seeing the History in the View. Important to recognise that development of tall buildings in some of the OAs could cause severe harm to the setting of WHS unless they are designed and managed within the context of protecting the OUV of the WHS.	Noted	Amend
English Heritage	Chapter 4 - public realm	Impl point - add street furniture. Important to recognise the value and contribution of historic street furniture, materials and surfaces - suggested textual changes. Add ref to English Heritage's Street for All guidance. Greening of public realm also needs to be assessed against impact on OUV.	Noted	Amend
English Heritage	Chapter 4 - Routes	Important to clarify what is meant by this element of setting.	Noted	Amend
English Heritage	Chapter 4 - Arrivals	The issue of regular audits of traffic signs and highway paraphernalia should be expanded to include the principle of de-cluttering. Para 4.29 – Support the promotion of increased use of the River Thames, as the approaches to the WHSs are often best experienced from the river.	Noted	Amend

English Heritage	Chapter 4 - Day and Night	The night time appearance of all developments should be fully assessed in terms of their impact upon WHSs. There are opportunities to improve management of night time use of lighting and activities which could improve the setting of WHSs.	Noted	Amend
English Heritage	Chapter 4 - Safety and Security	Impl Point 10 – Suggest not only the historic fabric is maintained but the OUV of the WHS is enhanced through better management and design of security features both within the WHS and in its setting.	Noted	Amend
English Heritage	Chapter 4 - Historic / Cultural Associations	Suggested Textual Changes	Noted	Amend
English Heritage	Chapter 4 - Other Env Factors	Should include soundscape and ambience as key characteristic of WHS and their settings. Aircraft noise has been forgotten - particularly for Kew.	Noted	Amend
English Heritage	Chapter 4 - Sustainability	Suggested Textual Changes.	Noted	Amend
English Heritage	Chapter 5 - Intro	Important to ensure HIA are fully integrated into other impact assessment processes and that issues relating to WHS settings should be rigorously considered at the screening and scoping stages of EIAs and other similar staged assessment processes.	Noted	Amend
English Heritage	Chapter 5 - Impl Point	Need to ensure steps in the framework are consistent with English Heritage Setting Guidance. Specifically that Step 2 should be amended so that the premise of the assessment process should always be the significance of the heritage asset, the contribution the setting makes to its significance and the impact development would have upon that contribution.	Noted	Amend
English Heritage	Chapter 5 - Step 1	Suggested Textual Changes.		

English Heritage	Appendix 2 - Significance of Assets	Welcome approach of use of ICOMOS's HIA, however it is important to ensure that the adaptations made are clearly justified. We suggest some changes to ICOMOS's guidance to reflect the PPS5 and the draft NPPF.		
English Heritage	Chapter 5 - Step 4	Cumulative Impact -unless successfully recognised and managed could have a significant impact upon the setting of the WHS and its OUV through incremental development. Direct / Indirect Impacts - need to expand to include greater activity through pedestrian or motorised movements. Scheme Design - suggest other issues - microclimate, orientation and form of building.	Noted	Amend
English Heritage	Chapter 5 - Magnitude of Impact	Suggest there is a range of factors which can determine degree of impact. There is a useful set out key attributes pg page 21 of English Heritage Setting Guidance.	This list of attributes is covered by the element of setting which are considered in the revised step 2 of the framework.	No Change
English Heritage	Chapter 5 - Step 5	Need to ensure relationship between attributes of OUV, integrity and authenticity are fully understood. Also strongly suggest that PPS5 is reference here as it clearly sets out advice on the need to provide clear and convincing justification.	Noted	Amend
English Heritage	Chapter 6	Need to include reference to National Trust, Natural England and key amenity groups such as Georgian Group, Victorian Society, and the Twentieth Century Society. At the London level, this could include the London Parks and Gardens Trust.	Noted	Amend
English Heritage	Chapter 6	Clarification suggestions	Noted	Amend
English Heritage	Appendix 3	Suggest changes to ensure consistency with PPS5 and NPPF	Noted	Amend
English Heritage	Appendix 4	Suggest adaption to table to ensure consistency of approach with PPS5 and NPPF	Noted	Amend
Greenwich Foundation	General	Please replace Trinity Laban and University of Greenwich with Greenwich Foundation	This has been done in a few places, apart from where there is a specific need to reference the individual organisations.	Amend in appropriate places.

ICOMOS UK	General	ICOMOS UK supports the thrust of the SPG. However there is a need for more clarity on who defines setting and what form a definition of setting might take. The SPG does not make clear whether there is a commitment for the Steering Groups to define setting.	Noted. It is not within the power of the GLA to make commitments on behalf of the steering groups as the GLA is only one partner. However one of the roles of the SPG is to encourage others (in partnership with the GLA) to undertake such work and highlight the benefit in helping to provide appropriate protection.	Amend to make clearer that it is the Steering Groups and Local Authorities' role to define the settings of the WHS and set out guidance on what form this might take.
ICOMOS UK	General	Consider that a three dimensional layered approach to defining setting should be explored.	This has significant cost implications. The GLA has neither the funds to do undertake this for each of the 4 WHSs or make it a requirement for others to part fund this type of work - particularly in an environment of severe public sector cuts.	No Change
ICOMOS UK	General	In ICOMOS's view the results of analysing and defining setting could reveal the potential opportunity for tall buildings in the right places.	This is the basis of London Plan Policy 7.7 which states that boroughs should identify appropriate, sensitive and inappropriate locations for tall buildings. This is clearly set out in Policy Context in Chapter 2 and is referenced through the elements of settings in Chapter 4.	No Change
ICOMOS UK	General	Supports the main thrust of the draft SPG. It considers that it has set out with elegance and clarity the way OUV and the attributes of OUV now form the basis of management of WHSs. ICOMOS-UK also welcomes a focus on the ICOMOS Guidance on Impact Assessment as part of the methodology for defining the potential impact of proposed changes or development on the OUV of WHSs.	Noted	No Change
ICOMOS UK	General	Suggested Textual Changes throughout.	Noted	Amend

Kew Gardens	Chapter 3	Main concern relates to the comment that the Mayor does not feel buffer zones are helpful in London context. Our experience is that a buffer zone does offer some benefit however our is too narrowly drawn and that even when sites fall partly or wholly within it, LPA do not place sufficient weight on the presence of a buffer zone in deciding applications.	Noted. This statement is not saying that buffer zones cannot be designated if appropriate, however in the London context as a whole taking into account issues for all 4 four WHS, they would not necessarily be appropriate for all and there maybe other mechaisms which maybe more effective.	Amend to clarify
Kew Gardens	Chapter 3	The SPG could be more positive about defining the defining settings on a map.	The SPG states that there may be a number of ways to define settings and for the immediate setting using a map might be helpful in conjunctions with an analysis of the elements of setting. However for the wider setting, due to the urban nature of London's World Heritage Sites and their multi-faceted relationships with OUV, a line on a map cannot fully explain the relationship between their surroundings and the significance of the site. Also the extent of the setting changes depending on the nature of the proposal, and includes any area in which change or development is capable of having an adverse effect on the Outstanding Universal Value of the World Heritage Site. Drawing a line on map for the wider setting can therefore give a false impression as to whether a proposal is likely to have an effect or not.	Amend to clarify
Kew Gardens	Chapter 5	Chapter 5 could perhaps be more concise in its guidance on assessing impacts.	Others have suggested the guidance needs to be more detailed.	No Change

Land Lease	General	Wish to reiterate the objective of the London Plan to deliver significant high density development, including tall buildings in OAs. The SPG should recognise that this objective can be achieved without adversely affecting the setting of WHSs and that in some instances tall buildings will be acceptable. In addition, the SPG should acknowledge that a negative impact may be outweighed by other regenerative, social or other public benefits.	The London Plan designates OAs where there is significant capacity for growth. However, it does not say that these areas should be high density or that they have to include tall buildings. The appropriateness of these issues needs to be analysed as these OAs are prepared and implemented. In terms of balancing harm to OUV against other benefits, as per Para 5.32 it states that it may be necessary to balance potential benefit against harm to the assets, however the weight given should be proportionate to the significance of the asset.	Amend to include ref to PPS5 and NPPF on terms of proportionality.
London Borough of Greenwich	Chapter 5 - Step 5	Important that to recognise that use of S106 of proposals should be based on the three test where it is appropriate to use such funding.	Noted	Amend
London Borough of Greenwich	Chapter 6	Recommendation that planning officers should form a sub-group is too prescriptive and such simply suggest officers liaise on a regular basis.	Noted	Amend
London Borough of Greenwich	Chapter 6	Need to recognise importance of development plan as a key document for use by developers in assessing proposals.	This implicit through out the document as it the fundamental basis of the UK planning system.	No Change
London Borough of Tower Hamlets	General	Welcome this comprehensive draft SPG. Note and agree that it is appropriate to recognise the dynamic nature of the setting of the WHS's in London, settings combining the old and new, protecting heritage but encouraging change. Note and agree that it is not the intent of the draft SPG to define the specific settings for each individual site, but rather to move to consistent interpretation.	Noted	No Change

London Borough of Tower Hamlets	Chapter 2	Note and agree that the policy digest is a good tool to set out and explain the layers of guidance and policy at an International, national and local level, particularly emphasising the OUV's and World Heritage Site Management Plans.	Noted	No Change
London Borough of Tower Hamlets	Chapter 3	Support the principal of guidance and definition of the setting of the Tower of London, and agree that this is a more useful tool to steer development dynamically than the use of a buffer zone. Drawing a line on a map would not in itself be appropriate to determine whether a proposal is likely to have an effect or not. Support the concept that setting is not solely defined by views into and out a WHS, but can also be defined by other physical and experiential elements.	Noted	No Change
London Borough of Tower Hamlets	Chapter 5	Welcome the digest of elements that make up the setting of the WHS's, together with the framework for assessing impact and managing change. This represents a useful toolkit, and is a step-change in the way that the assessment of setting is organised. This will bring about consistent assessment of schemes and provide useful initial guidance to developers of land considering development within the setting of WHS. Developers will more easily begin to check that proposals do not cause adverse impacts on the WHS or their settings.	Noted	No Change
London Borough of Tower Hamlets	Chapter 4 - Views	Supports the recognition given to the evolving skyline around the Tower of London, and notes that this needs to be considered in the context of identified Strategic Views.	Noted	No Change

London Borough of Tower Hamlets	Chapter 4 - public realm	welcome the priorities set out for improving the public realm and routes to and from the WHS, but consider more might be put in the document that would set out the mechanisms by which this could be achieved and implemented. Likewise welcome the implementation point about access, and the new emphasis on this, but again would wish to see more in the document around	Noted	Amend
London Borough of Tower Hamlets	Chapter 4 - Other Environmental Factors	Welcome the emphasis put on the reduction of traffic noise, fumes and airborne pollutants on the WHS. This is particularly adverse in the case of the Tower of London. But again would to comment that more should be set out around the mechanisms to achieve this, particularly around the roads controlled by TfL at the Tower of London.	Noted	Amend
London Borough of Tower Hamlets	Chapter 4 - Sustainability	Notes the new emphasis on climate change mitigation and will consider this in the context of the Proposed Submission Version of our Managing Development DPD as part of the Council's LDF.	Noted	No Change
London Borough of Tower Hamlets	Chapter 6	Welcomes the clarification of the roles and responsibilities involved in the planning and management of World Heritage Sites.	Noted	No Change

London Borough of Wandsworth	General	Whilst the policy context describes the international policy down to the local, it does not sufficiently describe how these operate together as part of the decision-making process in order to provide the necessary safeguards for the World Heritage Sites, including the role of the Mayor and the SoS	Throughout the document, references to plan making and assessing of development proposals applies to all those who undertake them, including the Mayor through OAPFs and in his role in assessing strategic applications as well as local authorities. There is also guidance for World Heritage Site steering groups in reviewing the management plans. Chapter 6 sets out the various roles and responsibilities of the range of stakeholders. The SPG does not need to set out the how the UK planning system works in terms of SoS role.	No Change
London Borough of Wandsworth	Chapter 4	The SPG suggests that a more appropriate mechanism than a buffer zone is definition of setting and the policies set out in this guidance. This is supported and it will be important to define the settings as part of the review of the management plans.	Noted	No Change
London Borough of Wandsworth	Chapter 5	The framework is useful for those developers within Nine Elms where to understand the impact of their development proposals on the Outstanding Universal Value of the Westminster WHS.	Noted	No Change
London Borough of Wandsworth	Chapter 6	Rather than developers engaging with the WHS Steering Group it is suggested that a more appropriate procedure would be for the WHS Steering Group to be a consultee on planning applications in Nine Elms.	Noted. This is something that needs to be proposed to the Westminster WHS steering group.	No Change

Maritime Greenwich		The role of the London Plan is not clear, the introduction leaning principally on Local Development Frameworks to deal with the issues of WHS Settings. As is highlighted in the subsequent text a number of important views to and from WHS cross borough boundaries. It is unrealistic to expect LDF's to embody policies which relate to a Site in another borough. This is surely a role for the London Plan to adopt.	The policy framework diagram on page 8 sets out the relationship of this SPG will the London Plan. In terms of views, the London Plan does set out guidance for managing strategic views which cross borough boundaries. For those local views around WHS which cross borough boundaries, the SPG highlights how other mechanisms might be appropriate - for example the Tower of London Local Setting Study.	Amend to include more specific reference to Tower of London Local Setting Study which illustrates one mechanism of how local views which cross borough boundaries can be managed in a co-operative way by different local authorities.
Maritime Greenwich	Chapter 2	Would be helpful to show direct link between UNESCO and National Guidance to WHS management plans.	Noted	Amend
Maritime Greenwich	Chapter 2	2.17 refers to the need for local policy frameworks to include policies on safeguarding settings but no structure is put forward to deal with cross-borough situations	The Steering Groups are the main mechanisms for pursuing cross borough issues in relation to WHS. Also policies in the London Plan apply to all boroughs in London.	No Change
Maritime Greenwich	Chapter 3	It is agreed that buffer zones as delineated do not necessarily relate to considerations of setting. The concept could be extended to mean the same thing but the zones would have to be extended considerably.	The SPG advocates the use of setting as a concept rather than buffer zones, partly for these reasons.	No Change
Maritime Greenwich	Chapter 4 - Context	Dispute that London's dynamic nature necessarily means a changing skyline, dynamism can happen without a changing skyline.	Noted	Amend
Maritime Greenwich	Chapter 4 - Character	Boroughs should prepare planning briefs for sites, which sets out design constraints - this should set the context for assessing against character.	The SPG will reference importance of plan making in understanding setting of WHS	Amend

Maritime Greenwich	Chapter 4 - Landscape	The view from Wolf Statue in Greenwich Park is mentioned as significant. There should be more references in the LVMF.	Whilst it is important that the LVMF SPG and WHS SPG are consistent, this consultation is not specifically for the LVMF SPG.	No Change
Maritime Greenwich	Chapter 4 - Views	Views' refers to the LVMF as designating strategic views. However, although this would be a strong vehicle for protecting views, the LVMF appears primarily to be concerned with the views of St Pauls rather than those views key to the World Heritage Sites and their OUV.	The LVMF includes views both of St Paul's and of 3 WHS. The text will be amended to ensure there is an understanding of all 3 types of views: strategic ones designated through the LVMF, local views set through LDFs as well as local views which cross borough boundaries identified and endorsed by WHS Steering Groups, which include adjoining boroughs.	Amend
Maritime Greenwich	Chapter 4 - Routes	Importance of routes is agreed, particularly linked to development proposals and highway improvements. The use of S106 should be mentioned. The section should also include reference to spaces as well as routes. Also 'historic' routes is better than 'old' routes.	Noted	Amend
Maritime Greenwich	Chapter 4 - Day and night	The facades of the Baroque buildings respond very well to floodlighting which can highlight details better than daylight. Canary Wharf towers also provides an exciting backdrop to Maritime Greenwich at night. Also suggest that this topic is linked to the 'sustainability and climate change' section.	Noted	Amend
Maritime Greenwich	Chapter 4 - Safety and Security	The section on 'safety and security' is welcomed. Suggest case study to highlight issues at Greenwich in the August 2011 riots. This experience has given impetus to seeking ways of protecting the area in future. There will also be lessons learned through the hosting events for the Olympics.	Noted	Amend

Maritime Greenwich	Chapter 4 - Other Environmental Factors	Noise and environmental damage from traffic is important. There should be more direction on how to achieve the removal of traffic.	Noted	Amend
Maritime Greenwich	Chapter 4 - Sustainability	Inclusion of 'sustainability and climate change' is welcomed. Suggest adding that the historic environment is a sustainable artefact and historic buildings embody energy and resources previously use. As well as supporting sustainable construction, the operations in a site should be more sustainable eg serving food only from sustainable sources.	Noted	Amend
Maritime Greenwich		The ICOMOS Guidance on HIA is welcome. However the use of the approach will depend on the support by adjoining boroughs for the OUV's of WHS. For example development proposals in the Isle of Dogs which may have an impact on the setting of the Old Royal Naval College, an attribute of OUV, and will need assessment by the planning case officer in LB Tower Hamlets. This infers a degree of support that may not be available in the political context.	London Plan Policy and guidance contained in this SPG is applies to all boroughs in which development proposals or plan making which might affect the setting of a WHS. Tower Hamlets are referenced on list of local authorities for Maritime Greenwich in Chapter 6 Roles and Responsibilities.	No Change
Maritime Greenwich	Chapter 6	Suggest additions for list of property holders and for DCMS under strategic roles.	Noted	Amend
South Bank Employers Group	Foreword	Strongly support Mayor's Foreword which set out very clearly the balance required between heritage protection and the need for development, change and growth.	Noted	No Change

South Bank Employers Group	Chapter 1	<p>Welcome emphasis that the fundamental issue is to avoid compromising the OUV of a WHS. However concern that SPG extends this by frequent references to the 'attributes' of the OUV and to WHS Management Plans, both of which are established by the WHS steering group or management committee - which runs risk of going beyond London Plan Policy.</p>	<p>ICOMOS guidance recommends that attributes are identified in order to give more expression to SOUV but they must be firmly based on the SOUV. The UK Government has signed up to the 1972 UNESCO World Heritage Convention and through Circular 07/2009 gives the WHS Mgt Plans and the WHS Steering Groups, appropriate weight in the UK planning system.</p>	No Change
South Bank Employers Group	Chapter 1	<p>Concerned that definition of setting is left to the WHS Steering Groups - which are not necessarily representative of those affected by their decision and do not have to go through the rigorous consultation and examination procedures in the development of their management plans. Concern about what is appropriate 'weight' to implementing relevant provisions in WHS Mgt Plans - their preparation therefore needs far greater transparency. There is no mechanism for landowners to be involved in production of WHS Mgt Plans.</p>	<p>Steering Groups are made up of LAs, who are democratically accountable, as well as others such as EH, DCMS (as well as property owners of the site themselves - who whilst are not democratically accountable - they are responsible for the management of their own properties/land within the World Heritage Sites. The Mgt Plans all undergo public consultation, the production of the Mgt Plans and any amendments as a result of public consultation needs to be agreed by the steering groups, which includes the relevant local authorities, therefore providing a degree of transparency with the planning system. The weight afforded the implementation of the provisions of the WHS Mgt Plans are set out UK Government Circular 07/2009 and has been London Plan policy since 2008.</p>	No Change

South Bank Employers Group	Chapter 1	WHS management plans may “set out actions for safeguarding and enhancing their Outstanding Universal Value” which could be in conflict with other Mayoral policies e.g. consideration of a buffer zone.	The safeguarding and enhancing of OUV is a fundamental part of London Plan Policy 7.10. Whilst the Mayor does not necessarily agree that buffer zone are the most effective mechanisms for managing the settings of World Heritage Sites, buffer zones are not necessarily considered in conflict with other Mayoral Policies. The SPG also makes clear that should be considered on a case by case basis and in some case such as for Kew and for Greenwich have been considered appropriate.	No Change
South Bank Employers Group	Chapter 1	WHS Mgt Plans may also propose attributes of OUV which go beyond the agreed statement of OUV or may define the setting of a World Heritage Site which is inconsistent with the balance set out in the Mayor's foreword.	Attributes of OUV have to be clearly linked to the SOUV. They would then form part of the Mgt Plan which would undergo public consultation. The Mayor sits on the WHS Steering Groups - as such he would be part of the identification of attributes and the defintion of the settings for the WHSs.	No Change

South Bank Employers Group	Chapter 2	The SOUV is the basis of the assessment of developments which may impact upon it. It is not clear what protection there is to ensure UNESCO does not amend SOUVs in ways inconsistent with the UK Planning System or London Plan.	UNESCO do not amend SOUVs. It is for WHS Steering Groups, which includes LPAs and the GLA, to clarify points in the SOUVs which are then signed off by the UK Government, and then sent to UNESCO for agreement. If any amendments are proposed by the WHS Steering Group which are more significant than clarification of points, a renomination of the World Heritage Site is required, which would need to be agreed with the UK Government.	No Change
South Bank Employers Group	Chapter 2	The significance of the second part of para 2.16 is not clear	Noted	Amend
South Bank Employers Group	Chapter 3	Strongly welcome the clear statement that the Mayor does not support the designation of further buffer zones for World Heritage Sites in London. Would welcome clarity on how this statement relates to para 3.14 that Westminster WHS Mgt Plan will assess feasibility of establishing buffer zone. same applies to page 70 (para 4) and page 71 under Protection and Management.	The text on buffer zones has been amended to clarify the Mayor's view of them and their relationship to setting. The Mayor's view is not in conflict with para 3.14 or in conflict with Westminster's WHS SOUV in the appendix and as a member of the Westminster WHS Steering Group will be part of the discussion in the review of the management plan.	Amend
South Bank Employers Group	Chapter 4	Strongly support this clear statement of the relationship between WHS settings and the dynamic nature of the London skyline. Important that all other provisions in the SPG recognise this balance.	Noted	No Change

South Bank Employers Group	Chapter 4	Para 4.5 It would be helpful to have a broader definition of “those with responsibility for managing change”.	This includes WHS Steering Groups in preparing the WHS Mgt Plans, LPAs preparing planning documents, cultural strategies, highway strategies, etc, developers in their development proposals, etc, etc	No Change
South Bank Employers Group	Chapter 4	Support the specific references to OAs and recognition that accommodating change is a fundamental part of London’s history and identity. Would welcome a clear statement that the key issue is what impact development has on the OUV of a WHS. This clarity is important as several of the bodies which form part of WHS Steering Groups have expressed the view that if a development is visible from a WHS it is by definition harmful. The assessment must be the actual impact if any on the OUV, not simply visibility.	Noted. The purpose of the SPG is to ensure consistent of interpretation of this point which is reflected throughout the SPG, particularly in the Assessment Framework in Chapter 5.	Amend
South Bank Employers Group	Chapter 4	Support the reference to the importance of the River Thames	Noted. Relationship to River Thames has been expanded to a separate element of setting.	Amend
South Bank Employers Group	Chapter 5	Welcome the use of the word transparent in the description of the assessment process and the references in later paragraphs to developers engaging with World Heritage Site management committees. This is very important and to date has not been very effective. Much better to resolve matters at pre application stage than at Call In and Inquiry.	Noted and agree. However the SPG can only facilitate this as far as is within the Mayor's powers, trying to make this to happen in a more consistent manner across all the WHSs in London - fundamentally it will be the capacity of the WHS Steering Groups which will determine the level of engagement that can be provided. The SPG should however help by providing a consistent framework in which to discuss the potential impact of development on the OUV of WHS early on in the planning process rather at the end through a call in.	No Change

South Bank Employers Group	Chapter 5	Question whether the assessment of impact on other heritage assets should be included in this guidance. Not clear whether this reference relates only to other heritage assets within the boundary of the World Heritage Site or to others which might be affected by proposals.	The framework includes steps for both to ensure consistency in process. Para amended to clarify this.	Amend
South Bank Employers Group	Chapter 5	Para 5.14 - 5.16 identification of the attributes of OUV" by the Steering Group may lead to the inclusion of material in management plans which is inconsistent with para 4.1 of this SPG. For example, EH and ICOMOS UK have regularly expressed the view that any development visible from the Westminster World Heritage Site has an impact which is unacceptable. If such considerations are enshrined in the management plan and carry "appropriate weight" in the planning process the effect may be to distort the balance between heritage protection and the economic and community benefit of development which the planning system is designed to assess.	The SOUV, as per UNESCO requirements, were meant to be very brief - the identification of attributes clearly linked to SOUV as per UNESCO guidance should help with an understanding of the OUV of WHSs. The adoption of attributes will be part of the reviews of the Mgt Plans, which will not only undergo public consultation but will also have to be agreed by the LPAs and GLA, which make up the Steering Groups and who also have to balance heritage conservation and growth within their own policies.	No Change
South Bank Employers Group	Chapter 6	There should be transparency and accessibility with which WHS steering groups/consultative committees operate, requiring broad consultation and input to the Mgt Plans and any changes to them, as well as full involvement of all relevant stakeholders in discussions on the identification of attributes of OUV and a mechanism for involvement in the formulation of policies, plans and objectives which may impact on the landholdings and development proposals which go beyond the provisions of adopted regional, local and neighbourhood planning policies	Circular 07/2009 and the accompany Guidance Note The Protection and the Management of World Heritage Sites in England set out how steering groups should operate and the process for developing management plans. This SPG is consistent with this Government guidance.	No Change

South Bank Employers Group	Chapter 6	The Mayor's strategic role should be expanded to reflect the very clear statements in the Foreword and in paragraph 4.1 that the Mayor's role is to ensure that there is the right balance between heritage protection, economic growth and the needs of a dynamic world city.	The section quite clearly states the Mayor plays an important role in balancing the wider regenerative and economic priorities with the need to conserve and enhance the World Heritage Sites.	No Change
Tower of London	General	There is confusion over the assessment of the impact of the proposals on the setting of a WHS as opposed to the impact on the WHS itself. There needs to be greater clarity about understanding and defining the contribution made by the setting to the site's OUV.	Noted	Amend
Tower of London	Chapter 3	The introductory and explanatory section would have more authority if the sources for the various statements about OUV, etc were cited.	Noted	Amend
Tower of London	Chapter 3	The example of an attribute for Kew is not quite right - it should be "the continuing regimes of management and curation of the gardens and collections". Its about historic continuity, not just process.	Noted	Amend
Tower of London	Chapter 3	In the Draft SOUV for the Tower, the words "to some extent" have been inserted. This should be removed as it does not appear in the SOUV.	Noted	Amend
Transport for London	General	Welcomes the increase in planning certainty that this SPG creates. By providing clear planning guidance based upon WHS SOUVs, this will allow planning to take place in a lower risk environment, improving the speed and quality of project delivery. It also will provide a welcome degree of certainty for TfL in its capacity as a landowner, for example the consideration of view management when evaluating proposal for over-station development.	Noted	No Change

Transport for London	Chapter 1	Para 1.3 - This is particularly important as this recognises that changes to the streetscapes, vantage points and the built heritage that together form the setting of a WHS can have a major impact upon the WHS itself.	Noted	No Change
Transport for London	General	TfL Streetscape Design Guide' (2009) and 'Better Streets' (2009) should be referenced	Noted	Amend
Transport for London	Chapter 4 - Introduction	Para 4.6 should emphasise the need for development proposals to be considered with respect to their settings at the earliest stage possible, before designs are produced. This has the potential to reduce conflicts and wasting of resources on designs that should never be built owing to their harmful impact on the setting of a WHS	Noted	Amend
Transport for London	Chapter 4 - Character	Add reference to scholarly and well-detailed traditional design as this may also be appropriate.	Noted	Amend
Transport for London	Chapter 4 - Landscape	Suggest renaming 'relationship with the River Thames' to remove ambiguity	Noted	Amend

Transport for London	Chapter 4	The case studies should be comprehensive for all 4 sites.	This may run the risk that a detailed assessment of setting for each of the WHS has been undertaken and that the case studies identified are the full range of issues to be considered under each element of setting. This is not the case.	No Change
Transport for London	Chapter 4 - Character	The criteria 'bulk' should also be added to those of architectural quality, materials, scale and massing	Criteria used is consistent with London Plan policy 7.6	No Change
Transport for London	Chapter 4 - public realm	Add 'street furniture' to landscaping, paving, lighting etc in Impl Point. New lighting and street furniture should not be done at the expense of removing features that could make an important contribution to the overall character and sense of history of a WHS.	Noted	Amend
Transport for London	Chapter 4 - public realm	Suggest "Greening of the public realm can also assist with this, where this is appropriate".	Noted	Amend
Transport for London	Chapter 4 - public realm	Public realm needs to cater for high pedestrian flows. Congestion could be reduced via provision of new facilities for cycling.	Noted	Amend
Transport for London	Chapter 4 - public realm	Consistent enforcement of highway de-cluttering may be necessary. Suggest Textual Changes	Noted	Amend
Transport for London	Chapter 4 - River Thames	TfL has invested in pier infrastructure at Tower Pier and Greenwich to improve capacity and the quality of passenger experience	Noted	No Change
Transport for London	Chapter 4 - Accessibility and Inclusion	Impl point 9 is welcomed. Good design can be used to help make a place accessible to as many people as possible.	Noted	No Change
Transport for London	Chapter 4 - Safety and Security	Parking, delivery, servicing and loading/unloading areas must be designed sensitively and meet the needs of the WHS. Welcome Para 4.38 - insert "be designed to deter or reduce criminal behaviour".	Noted	Amend

Transport for London	Chapter 4 - Other Environmental Factors	Authorities should work with TfL and other highway authorities to improve safety and environmental quality; however it will be necessary to take into full consideration highway authorities' other responsibilities, such as the Network Management Duty	Noted	Amend
Transport for London	Chapter 5	Para 5.34 is welcomed but should be strengthened to highlight the importance of high quality transport access to WHS steering groups / consultative committees who will be seeking to increase visitor numbers and ensure that visitors have a most enjoyable experience	This important of the issue is explained in elements of setting chapter.	No Change
Transport for London	Chapter 5	Para 5.18 – This reference to 'movement' requires guidance pertaining to the physical capacity of an area within or in the vicinity of a WHS. Reflecting Para 4.28, these sites are high trip generators and there is a need to ensure that as many trips as possible are made by walking, cycling and public transport.	Noted.	Amend - add under Direct / Indirect Impacts
Trinity Laban Conservatoire	General	Please amend any references Trinity College of Music or Trinity Laban to Trinity Laban Conservatoire of Music and Dance.	Noted	Amend where appropriate