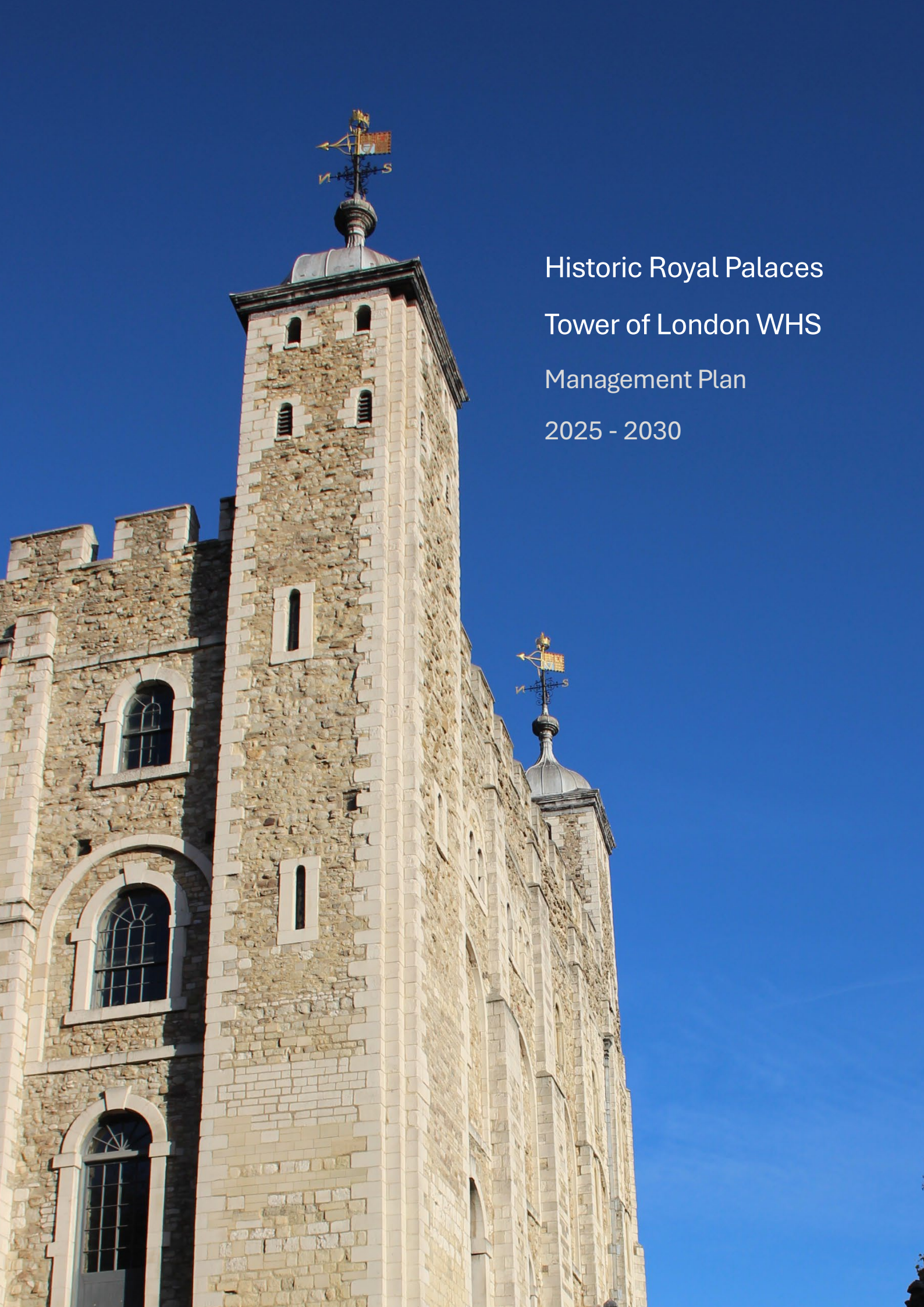

Historic Royal Palaces

Tower of London WHS

Management Plan

2025 - 2030

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EXECUTIVE SUMMARY

The Tower of London was inscribed on the UNESCO World Heritage List in 1988 in recognition of its extraordinary historical, architectural, and symbolic value. As one of England's most iconic and instantly recognisable historic sites, the Tower of London has been a powerful symbol of royal authority for nearly one thousand years. Today, it attracts approximately 3 million visitors per year. The property is owned by The King 'in Right of Crown' and is cared for by Historic Royal Palaces (HRP), an independent charity established by Royal Charter.

Historical and Cultural Significance

The Tower of London is the most complete example of an 11th century fortress palace remaining in Europe. Built by William the Conqueror to assert Norman control over the capital, it has served as a royal residence, armoury, treasury, prison, and execution site, and remains the home of the Crown Jewels. Its significance is recognised under UNESCO criteria (ii) and (iv), as a model of medieval military architecture and a place of exceptional historic continuity.

Purpose of the Management Plan

HRP's role is to conserve the Site while enabling public access and bringing its stories to life. The WHS Management Plan provides an overarching structure for achieving these aims, ensuring that day-to-day decisions and long-term planning are aligned with the protection and conservation of OUV, authenticity and integrity. The Plan also responds to wider national and international frameworks, including the *1972 World Heritage Convention*, the UK Government's planning policy, and Historic England's guidance. It complements HRP's organisational strategies and is informed by collaboration with statutory bodies, local authorities, and other key stakeholders.

Scope

This Management Plan sets out the strategic framework for the protection, conservation, and sustainable management of the Tower of London World Heritage Site over the period 2025-2030. This is achieved by defining clear objectives, identifying key

challenges and opportunities, integrating OUV considerations into all decision-making processes, providing an evidence base for managing change, and establishing robust risk management frameworks. A monitoring regime sets out the basis for an annual Action Plan, through which set objectives will be achieved. Externally, the Plan is also a material consideration in planning decisions.

Implementation of the Plan

The objectives of this Plan will be delivered through a coordinated programme of activity across six key thematic areas drawn from the Factors Affecting the Property section of the Periodic Reporting:

- Physical Conservation
- Visitor Management and Activation
- Operational and Residential Facilities
- Environmental Factors
- Organisational Governance
- Management of the Site's setting

Each is supported by a set of specific, measurable objectives and an associated Action Plan.

Physical Conservation

The physical fabric of the Tower of London is fundamental to its OUV, making its conservation vital for safeguarding its historical and cultural significance. HRP manages an ongoing programme of repair and conservation works, guided by a Conservation Management Plan and regular condition surveys. This structured approach forms the basis for planning conservation efforts and addressing emerging issues, alongside ad hoc inspections for urgent localised problems.

Overall, the Tower of London is well cared for through structured systems, dedicated teams, and regular monitoring that supports adaptive conservation. These efforts are guided by overarching plans and strategies that ensure alignment with the Site's long-term needs, historical significance, and evolving environmental conditions.

Visitor Management and Activation

The Tower of London is the UK's most visited paid attraction, drawing nearly 3 million visitors annually, which presents several challenges that could damage its OUV if not carefully managed. These challenges include localised physical conservation issues due to wear and tear, visitor overcrowding at key locations, maintaining the quality of the visitor experience, and the need for new infrastructure that could potentially impact OUV.

HRP has developed comprehensive plans to address these issues as part of their Tomorrow's Tower programme, which will protect the Tower of London's past and prepare it for the future. The programme will see HRP investing in the Tower of London's buildings, facilities, and staff to enhance visitor experience, alleviate overcrowding, and better share the property's historic assets with everyone by improving accessibility. Furthermore, there are plans to expand existing educational facilities, and strengthen community engagement through lifelong learning opportunities. Ensuring both staff and visitors understand the Tower of London's World Heritage Site status is critical for sustainable and inclusive visitor management.

Operational and Residential Facilities

The Tower of London is an active, living heritage site that houses essential residential and operational facilities crucial for its daily functioning. Its continuous use, which forms part of its OUV, is enhanced by the presence of the Crown Jewels, and further supported by the Royal Armouries managing some of its collections, displays, interpretation, and archives. Operational facilities include homes, offices, and training spaces for staff, and maintaining them to modern standards while ensuring their continued viability and adaptability to shifting operational needs is vital for the Tower of London's future sustainable management.

However, maintaining modern facilities can create potential conflicts with the conservation requirements for the site's historic character and fabric, necessitating a balanced approach. Subsequently, guidance is under development for OUV to be

incorporated into Heritage Impact Assessments for projects within the Site. Additionally, HRP has robust security planning and operational measures in place, that consider both security and conservation outcomes.

Environmental Factors

The Tower of London is significantly affected by environmental risks, both local and global in scope, which necessitate careful management to protect its OUV and physical integrity. Key issues include air pollution causing stone discolouration and black crusts, the potential rise in sea levels affecting Thames tide levels, and flooding from the tidal River Thames and surface water, particularly in the moat area. Furthermore, the effects of climate change are anticipated to cause changes in heating and cooling cycles within buildings and increases in overall and extreme rainfall events, which can damage building fabric. These issues are regularly monitored through the State of the Estate report to ensure early detection of long-term impacts.

In response to these challenges, HRP developed a strategic climate change risk assessment in 2022 to identify and respond to climate impacts, ensuring the Tower of London's physical fabric is conserved. HRP is also addressing its own environmental footprint, with a bold goal to achieve nature-positive carbon net zero across its estates and value chain by 2050, supported by a Sustainability Action Plan. This commitment involves operational and infrastructure changes, which require a careful balance with physical and aesthetic conservation issues.

Organisational Governance

The governance system of the Tower of London operates within a well-structured framework, guided by an overarching strategy that positively impacts the site. This framework effectively promotes efficient decision-making, ensures coordination between operational and organisational goals, and encourages collaboration across all levels of the organisation, contributing positively to the management of the Tower of London.

However, there is a need to explicitly and audibly consider OUV in all major decisions, from the Trustee level outwards. Currently, the potential impact of decisions on OUV is not consistently documented in this manner. This strategic shift will not only mitigate risks and reinforce the protection and promotion of the Tower of London's OUV but also strengthen alignment with best practices in heritage management, ensuring OUV remains central to all strategic and operational planning.

Management of the Sites Setting

The Tower of London's setting is central to its significance and OUV. It has changed considerably through time as the wider city has ebbed and flowed around the site, and functions have changed at the site and its wider environs. For well over a decade concerns have been raised by UNESCO and ICOMOS regarding the impact on OUV that they consider new development is having due to changes to the setting of the site.

The effective management of the Tower of London's setting is critical to safeguarding its OUV. Currently, the evidence base for its setting is limited in scope and out of date, failing to reflect physical changes and current policy guidance, thus hindering robust impact assessments. Updating the evidence base through a new setting study, and continued management of change in the surrounding environment is therefore essential to maintaining the Site's integrity.

Monitoring and Review

The Management Plan will be reviewed on a five-year cycle, excepting interim reviews necessitated by change to key factors or planning. The Tower of London World Heritage Site Consultative Committee, comprising various stakeholders, monitors the plan's implementation and provides a forum for discussion. Monitoring is carried out by the WHS Coordinator to track progress and ensure effectiveness. HRP continues to work in partnership with key stakeholders to ensure that the Site continues to be protected and celebrated for generations to come.

1.0 INTRODUCTION AND PURPOSE OF PLAN

1.1 Tower of London World Heritage Site

1.1.1 The Tower of London is one of England's most instantly recognisable and important historic fortress complexes, it is an icon of royal power with a history stretching back nearly one thousand years. UNESCO inscribed the property on the World Heritage List in 1988 in recognition of its Outstanding Universal Value (OUV) as part of global heritage belonging to all nations of the world. Today the Tower of London attracts c. 3 million visits per year and is the most visited paid attraction in the UK.

1.1.2 The Tower of London is owned by The King 'in Right of Crown'. His Majesty holds the property in Trust for the next monarch and by law cannot sell, lease or otherwise dispose of any interest in the property.

1.2 Key Details

Name

1.2.1 Tower of London (C448).

Location

1.2.2 London Borough of Tower Hamlets, London, UK

1.2.3 Grid Reference N51 30 29 E0 4 34

Size

1.2.4 7.5 hectares.

Boundaries

1.2.5 The boundary of the site encompasses the historic extent of the Tower complex (see Figures A and B) and broadly follows the Tower of London Scheduled Monument boundary except in its southwest corner. The southern boundary includes the wharf and is delimitated by the edge of the River Thames. The eastern boundary is defined by the external edge of the moat and Tower Bridge Approach. The northern and western boundaries encompass the moat and Tower

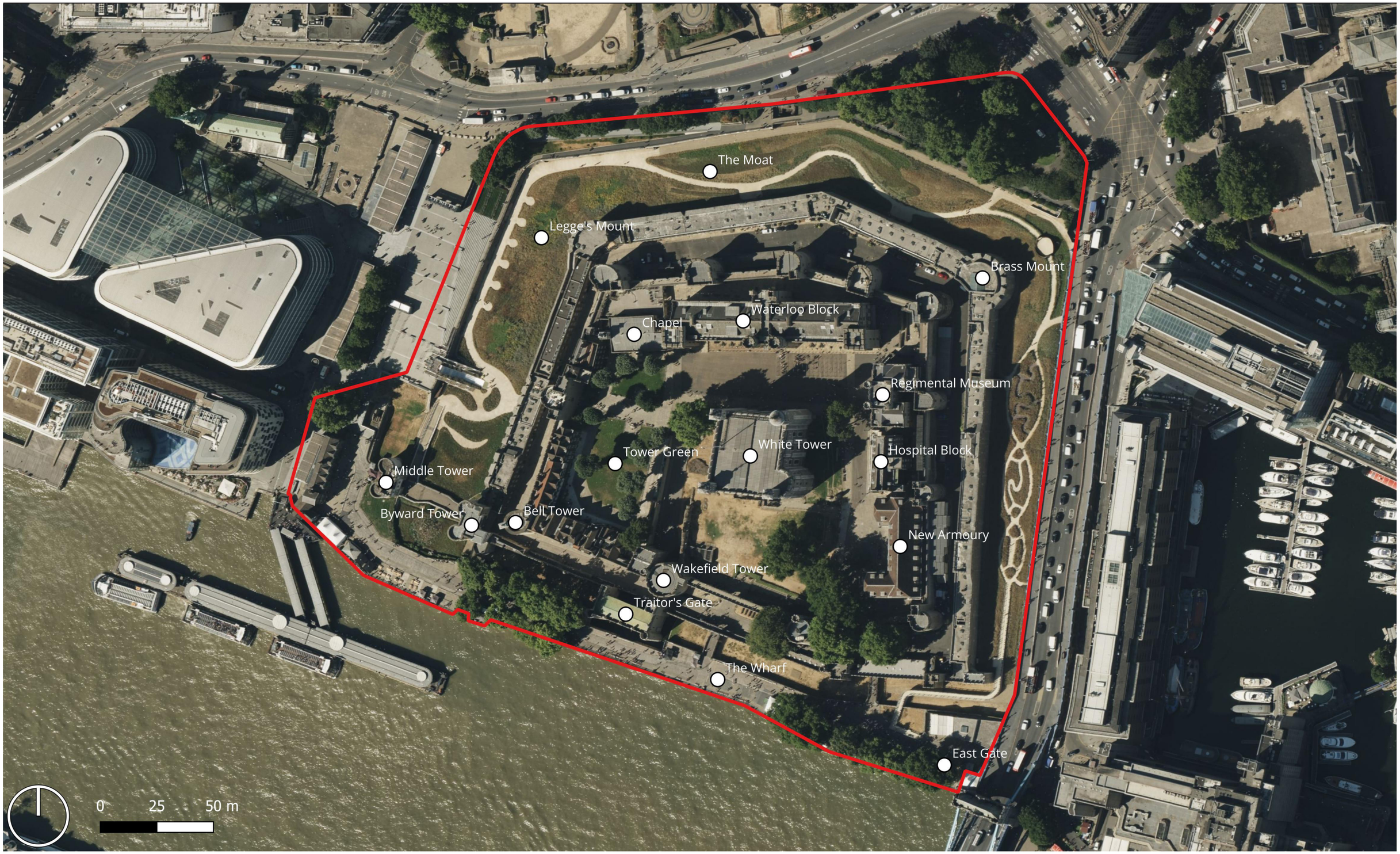
Legend

Tower of London WHS Boundary

0 100 200 m

Map Extent

© ESRI (2025) and Google Satellite (2025)



© ESRI (2025) and Google Satellite (2025)

Gardens. The boundary excludes Tower Hill and the Welcome Centre, connecting back south at Wharfinger's Cottage.

Designations

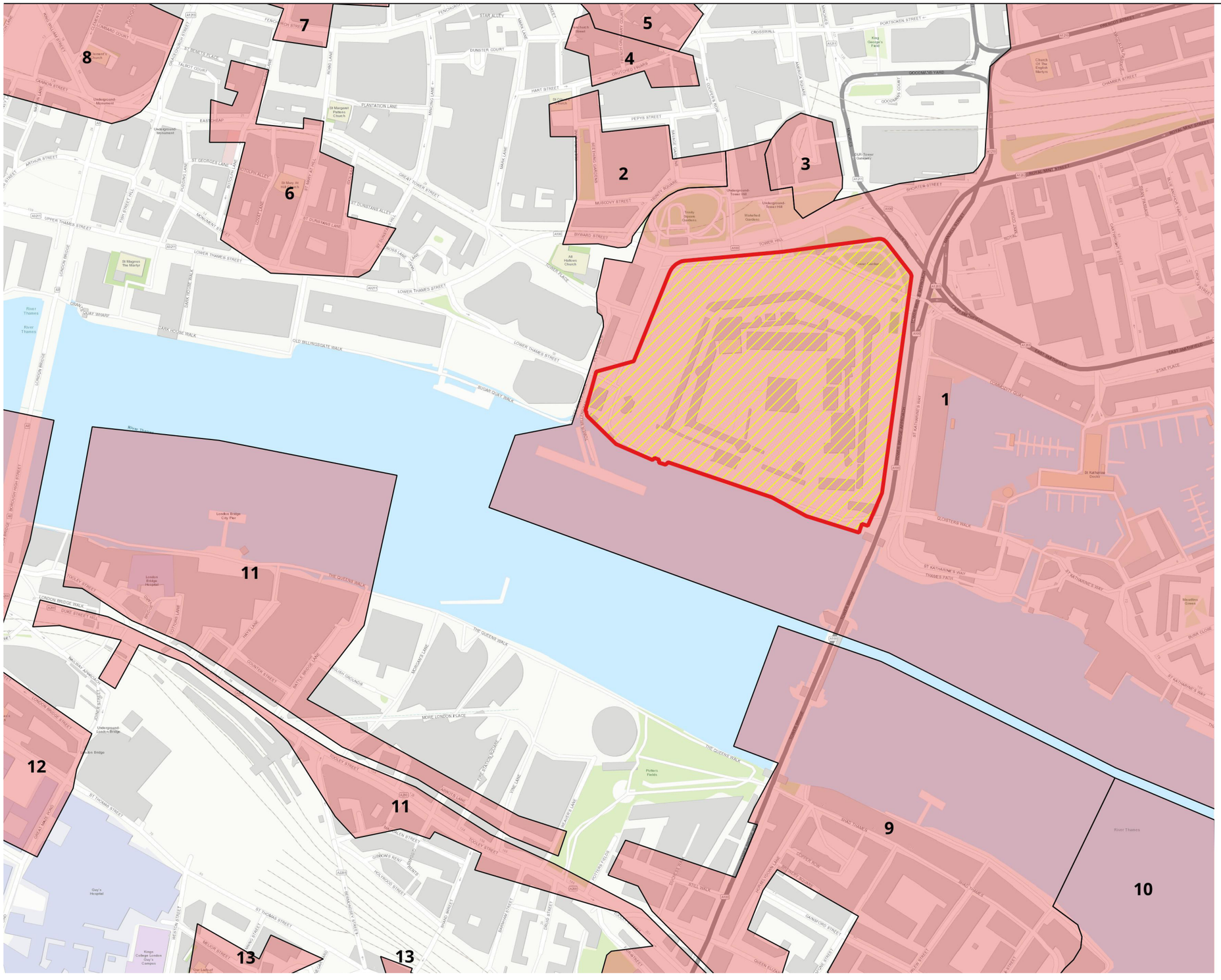
1.2.6 Given its historical importance, the Tower of London enjoys multiple designations (see Figures C1 and C2):

- UNESCO World Heritage Site, inscribed in 1988
- Scheduled Monument covering the totality of the area of the Tower of London to the outer edge of the moat, encompassing all buildings and structures (Greater London SAM No. 10). This area broadly corresponds to that of the WHS
- Most buildings and structures within the boundary are listed (Grade I, II*, and II)
- Site sits within The Tower of London Conservation Area
- Site sits within the Tower of London, St Mary Graces and Tower Hill Tier 1 Archaeological Priority Area (APA)

1.3 Historic Royal Palaces

1.3.1 In 1989, the Historic Royal Palaces Agency (HRPA) was established and took on the custodianship of the Tower of London. Since then, it has managed the Tower of London, investing in extensive conservation and activation measures. In 1998, HRPA became an independent charity, established by Royal Charter, changing its name to Historic Royal Palaces (HRP). It is governed by a Board of Trustees, all of whom are non-executive. The Chief Executive is accountable to the Board of Trustees and chairs an Executive Team of Directors, who manage the Tower of London under contract with the State Party.

1.3.2 As a longstanding and major charity, HRP has established strategies, policies and plans to guide all its activities and decision-making. It is overseen by the Department for Digital, Culture, Media & Sport (DCMS) and advised by Historic England, the government's advisor on the historic environment.



Legend

- Tower of London WHS Boundary
- Conservation Areas
- Tower of London Scheduled Monument

Conservation Areas

1. The Tower (LBTH)
2. Trinity Square (City)
3. Crescent (City)
4. Fenchurch Street (City)
5. Lloyds Avenue (City
6. Eastcheap (City)
7. Leadenhall Market (City)
8. Bank (City)
9. Tower Bridge (LBS)
10. St. Saviours Dock (LBS)
11. Tooley Street (LBS)
12. Borough High Street (LBS)
13. Bermondsey Street (LBS)

0 100 200 m

© ESRI (2025) and Google Satellite (2025)

Legend

Tower of London WHS Boundary

Listed Buildings

- I
- II
- II*

0 25 50 m

© ESRI (2025) and Google Satellite (2025)

1.4 Purpose and role of this Management Plan

1.4.1 As detailed in Section 3, this Management Plan forms part of the wider management framework for the Tower of London World Heritage Site (WHS), which includes international and national legislation, policy and guidance as well as internal HRP strategies, policies and frameworks. The WHS Management Plan is also a material consideration in planning decisions.

1.4.2 Within this framework the Management Plan has defined roles focussed on supporting the long-term conservation of the Property's Attributes of OUV, authenticity and integrity by:

- Setting out objectives to inform the overall management framework in terms of day-to-day operations and long-term planning;
- Highlighting key challenges facing the Property, and potential opportunities for improvement and change;
- Identifying potential measures to enhance the management of the property in respect of its OUV, with a particular focus on integrating the consideration of OUV into decision-making processes;
- Providing evidence to inform decision-making relating to change within the site and wider city, as well as signposting other evidential documents. Noting that the Management Plan is a material consideration in planning decisions;
- Identifying and describing the Property's extensive disaster and risk management frameworks;
- Setting out a monitoring regime for the Management Framework to support the conservation of OUV; and
- Forming the basis for a rolling annual Action Plan to continue to support the conservation of the Property's OUV. The Action Plan is a separate document.

1.4.3 The Management Plan is therefore intended to support managers and stakeholders in ensuring that the Tower of London's OUV is recognised, conserved, and celebrated.

1.4.4 It aligns with other key governing documents, themes, and strategies, contributing to a cohesive managerial structure that fosters effective stewardship in a complex environment.

1.5 Structure of this Plan

- **Section 2. Statement of Outstanding Universal Value and Other Significances** – sets out the OUV of the WHS as adopted by UNESCO, supported by the Attributes of OUV, as well as the associated values of national and local significance
- **Section 3. Governance and Management Arrangements** – describes how the Property is currently managed
- **Section 4. Framework – Legal, Policy and Guidance** – identifies the external legal, policy and guidance context for the Property and for the management of change that may affect the OUV of the Property, whether within or outside of the Property boundary
- **Section 5. Factors Affecting the Property** – sets out the key challenges facing the Property and potential opportunities for improvement and change
- **Section 6. Risk and Disaster Management** – sets out the Property's disaster and risk management frameworks
- **Section 7. Objectives** – establishes a suite of objectives addressing the key factors
- **Section 8. Monitoring** – establishes an agreed monitoring regime
- **Section 9. Appendices**

1.6 Note on Terminology

1.6.1 Throughout this Plan the phrases "World Heritage Site" and "World Heritage Property" are used interchangeably. They refer to the same asset. The different terminology reflects the way that places inscribed on the World Heritage List are described by UNESCO (Property) and how they are described in English planning policy (Site).

2.0 STATEMENT OF OUTSTANDING UNIVERSAL VALUE AND OTHER SIGNIFICANCES

2.1 Statement of Outstanding Universal Value

2.1.1 Following is the agreed Statement of Outstanding Universal Value (OUV) as published by UNESCO[1]:

Brief Synthesis

"The Tower of London is an internationally famous monument and one of England's most iconic structures. William the Conqueror built the White Tower in 1066 as a demonstration of Norman power, siting it strategically on the River Thames to act as both fortress and gateway to the capital. It is the most complete example of an 11th century fortress palace remaining in Europe. A rare survival of a continuously developing ensemble of royal buildings, from the 11th to 16th centuries, the Tower of London has become one of the symbols of royalty. It also fostered the development of several of England's major State institutions, incorporating such fundamental roles as the nation's defence, its record-keeping and its coinage. It has been the setting for key historical events in European history, including the execution of three English queens.

The Tower of London has Outstanding Universal Value for the following cultural qualities:

***For both protection and control of the City of London, it has a landmark siting**. As the gateway to the capital, the Tower was in effect the gateway to the new Norman kingdom. Sited strategically at a bend in the River Thames, it has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy. It had the dual role of providing protection for the City through its defensive structure and the provision of a garrison, and of also controlling the citizens by the same means. The Tower literally 'towered' over its surroundings until the 19th century.*

[1] Emphasis has been added to assist in identifying key qualities. The entirety of the SOUV has been italicised to clearly demarcate it from the text of the Management Plan.

The Tower of London was built as a demonstration and symbol of Norman power. *The Tower represents more than any other structure the far-reaching significance of the mid-11th century Norman Conquest of England, for the impact it had on fostering closer ties with Europe, on English language and culture, and in creating one of the most powerful monarchies in Europe. The Tower has an iconic role as reflecting the last military conquest of England.*

The property is an outstanding example of late 11th century innovative Norman military architecture*. As the most complete survival of an 11th-century fortress palace remaining in Europe, the White Tower, and its later 13th and 14th century additions, belong to a series of edifices which were at the cutting edge of military building technology internationally. They represent the apogee of a type of sophisticated castle design, which originated in Normandy and spread through Norman lands to England and Wales.*

The property is a model example of a medieval fortress palace, which evolved from the 11th to 16th centuries*. The additions of Henry III and Edward I, and particularly the highly innovative development of the palace within the fortress, made the Tower into one of the most innovative and influential castle sites in Europe in the 13th and early 14th centuries, and much of their work survives. Palace buildings were added to the royal complex right up until the 16th century, although few now stand above ground. The survival of palace buildings at the Tower allows a rare glimpse into the life of a medieval monarch within their fortress walls. The Tower of London is a rare survival of a continuously developing ensemble of royal buildings, evolving from the 11th to the 16th centuries, and as such, has great significance nationally and internationally.*

The property has strong associations with State Institutions. *The continuous use of the Tower by successive monarchs fostered the development of several major State Institutions. These incorporated such fundamental roles as the nation's defence, its records, and its coinage. From the late 13th century, the Tower was a major repository for official documents, and precious goods owned*

by the Crown. The presence of the Crown Jewels, kept at the Tower since the 17th century, is a reminder of the fortress' role as a repository for the Royal Wardrobe.

As the setting for key historical events in European history: *The Tower has been the setting for some of the most momentous events in European and British History. Its role as a stage upon which history has been enacted is one of the key elements which has contributed towards the Tower's status as an iconic structure. Arguably, the most important building of the Norman Conquest, the White Tower symbolised the might and longevity of the new order. The imprisonments in the Tower of Edward V and his younger brother in the 15th century, and then, in the 16th century, of four English queens, three of them executed on Tower Green – Anne Boleyn, Catherine Howard and Jane Grey – with only Elizabeth I escaping, shaped English history. The Tower also helped shape the story of the Reformation in England, as both Catholic and Protestant prisoners (those that survived) recorded their experiences and helped define the Tower as a place of torture and execution."*

To be inscribed, sites must be of 'Outstanding Universal Value' and meet at least one of ten selection criteria. The Tower was inscribed under two of the required criteria.

"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.

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.

Authenticity

The role of the White Tower as a symbol of Norman power is evident in its massive masonry. It remains, with limited later change, as both an outstanding example of innovative Norman architecture and the most complete survival of a late 11th century fortress palace in Europe. Much of the work of Henry III and Edward I, whose additions made the Tower into a model example of a concentric medieval fortress in the 13th and early 14th centuries, survives. The Tower's association with the development of State institutions, although no longer evident in the physical fabric, is maintained through tradition, documentary records, interpretative material, and the presence of associated artefacts, for example, armour and weaponry displayed by the Royal Armouries. The Tower also retains its original relationship with the surrounding physical elements – the scaffold site, the Prisoners' or Water Gate, the dungeons — that provided the stage for key events in European history, even though the wider context, beyond the moat, has changed.

Its form, design and materials remain intact and legible as at the time of inscription, accepting the fact that extensive restoration had been undertaken during the 19th century by Anthony Salvin in a campaign to 're-medievalise' the fortress. The Tower is no longer in use as a fortress, but its fabric still clearly tells the story of the use and function of the monument over the centuries. The fabric also continues to demonstrate the traditions and techniques that were involved in its construction. The ability of the Tower to reflect its strategic siting and historic relationship to the City of London is vulnerable to proposals for development that do not respect its context and setting.

Protection and management requirements[2]

The UK Government protects World Heritage properties in England in two ways. Firstly, monuments, individual buildings and conservation areas are designated under the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990, and secondly, through the UK Spatial Planning system under the provisions of the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004[3]. The property is protected as a scheduled ancient monument and buildings within it are protected as statutorily listed buildings.

Government guidance on protecting the historic environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09[4]. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents.

The Mayor's London Plan provides a strategic social, economic, transport and environmental framework for London and its future development over 20-25 years[5]. It contains policies to protect and enhance the historic environment in

[2] Note: The text on Protection and management requirements is quoted directly from the Statement of Outstanding Universal Value adopted by UNESCO. However, several sections of the text are now out of date. These are signposted with footnotes throughout, with reference to changes as of May 2025.
[3] While both Acts remain foundational, there have been subsequent amendments, and it is crucial that the most up to date versions are consulted.
[4] The Circular has been withdrawn and replaced with National Planning Policy Framework (NPPF, 2024) and subsequent guidance.
[5] The current London Plan was published in 2021.

general and World Heritage properties in particular. The London View Management Framework Supplementary Planning Guidance published by the Mayor protects important designated views, including a protected view of the Tower of London from the south bank of the River Thames[6]*. Locally, the Tower of London falls within the London Borough of Tower Hamlets and is adjoined by the City of London and the London Borough of Southwark. Each of these local planning authorities has an emerging Local Development Plan, which provide a framework of policies to protect and promote the Tower of London World Heritage property*[7]*.*

The Tower of London World Heritage Site Management Plan is reviewed regularly. Its implementation is integrated into the activities of Historic Royal Palaces, the independent charity responsible for caring for the Tower of London. The Tower of London World Heritage Site Consultative Committee, a group consisting of on-site partners, local authorities and heritage specialists, monitors implementation and review of the plan and provides a forum for consultation on issues affecting the Tower of London and its environs.

The most significant challenges to the property lie in managing the environs of the Tower of London so as to protect its Outstanding Universal Value and setting. At a strategic level, these challenges are recognised in the London Plan and the Boroughs' emerging Local Plans. These documents set out a strategic framework of policies aimed at conserving, protecting and enhancing the Outstanding Universal Value of the Tower and its setting. The challenges are also identified in the World Heritage Site Management Plan, which defines the local setting of the Tower and key views within and from it. Objectives in the Plan to address the challenges are being implemented (for example, through a local setting study that informed understanding of the immediate setting of the property[8]*, and*

[6] This is currently in the process of being updated. In addition to the view referenced in the text (Queen's Walk, 25A.1-3), there are two additional views with a role in protecting the setting of the Tower of London. These are the views from Tower Bridge (10A.1) and London Bridge (11B.1-2).
[7] See Section 4.6 of the Management Plan for the current Local Plans affecting the Tower of London WHS.
[8] The completion of this Objective resulted in the Tower of London Local Setting Study (2010), which is now out of date. As such, a new Setting Study is planned, which will better inform understanding of the property's setting.

through work on the property's attributes), although pressures remain significant, particularly in the wider setting. Discussions take place as part of the Management Plan review regarding how best to ensure continued protection of the Outstanding Universal Value of the property and its setting.

Other challenges include pressures on funding. However, Historic Royal Palaces has put in place robust measures to ensure that the Tower of London is properly protected, interpreted and conserved in accordance with its key charitable objectives. These measures include long-term conservation plans, prioritised and funded according to conservation needs, and cyclical maintenance plans. Plans for the visitor experience respond to the Historic Royal Palaces' Cause[9] — to help everyone explore the stories of the palaces — and are subject to rigorous evaluation. All plans are regularly monitored and reviewed."

2.2 Attributes of OUV

2.2.1 Attributes are physical elements, and tangible or intangible aspects or processes of the property that express and convey its OUV. The Attributes are founded in, and derived from, the Statement of OUV including both the Brief Synthesis and Criteria for Inscription, and the Statements of Integrity and Authenticity.

2.2.2 The protection, conservation and management of the OUV of the WHS is therefore achieved through the protection, conservation and management of the Attributes. It is therefore important that the Attributes of the property are robustly identified and described.

2.2.3 The following seven Attributes of OUV for the Tower of London were drawn from the Statement of OUV and presented in the 2016 Management Plan. These have been largely carried forward to this Plan with some limited updates and amendments.

2.2.4 The way in which the attributes in the Statement of OUV are summarised may be amended and updated in the future as new understanding and analysis of their components is undertaken.

[9] This is now referred to as HRP's Strategy.

1. An internationally famous monument

2.2.5 The Tower of London has been symbolic of royalty and royal power since William the Conqueror and is one of England's most iconic structures. It represents more than any other building the far-reaching effect of the Norman conquest of England and was emblematic of the might and longevity of the new dynasty. It has also been the setting for key events that changed the course of European history.

2.2.6 This attribute is expressed in the property's *form* and *design*, *use* and *function*, *location* and *setting*, and *traditions*, *spirit* and *feeling* in several ways including, but not limited to, the following:

- The iconic White Tower, its physical form and visual dominance. Experienced from a range of static and kinetic views outside of the site and also within the property.
- The Tower of London's distinctive silhouette with a clear sky backdrop. This is experienced from a number of locations, including in the world-famous kinetic views from the south bank of the Thames (for example LVMF protected view 25A.1-3), the kinetic views from Tower Bridge including from the North Bastion (LVMF protected view 10A.1), downstream views from London Bridge (an example of which is LVMF protected view 11B.1-2), and kinetic views from the river itself.
- The property is internationally recognised, and the silhouette of the White Tower has become an iconic image of London used in publicity by organisations such as Visit Britain
- The concentric defences around the White Tower as seen particularly in the elevated perspective of the Tower of London from Tower Bridge, and now from the Shard, as well as from the upper floors of many buildings within the Property
- The property's close relationship with the Thames, which provides its principal setting and the foreground in iconic views of the Tower of London from the south and from Tower Bridge

- The Wharf and the historically famous Water (or Traitor's) Gate, known world-wide from its depiction in literature and pictorial representations
- The historic traditions of the Tower of London, including the Yeoman Warders and the ravens, which are fundamental to its identity as a national icon

2. Landmark siting

2.2.7 The Tower of London was sited strategically to see and be seen along the Thames, both to protect and control the city, and to act as a gateway to London and the kingdom from the river.

2.2.8 Located within the south-east angle of the (still visible) Roman city wall, just above the Thames, key views along the river in both directions enabled the Tower of London to keep a watch over the main transport route and the potential approach of hostile forces. While no longer visible in long views from the east, the strategic relationship of the Tower of London to the river, emphasised by the surviving medieval wharf and Water (Traitor's) Gate, remains clear, as does its physical relationship to the centre of the City, now marked by a growing cluster of tall buildings to the north-west.

2.2.9 Although not within the tightly-drawn boundary of the property, the Liberties (the historically open, defensive space around the landward sides of the Tower of London) formed an important element of the Tower's defences when it was a fortress. The Liberties now make a significant contribution to the setting of the Tower of London, physically separating the site from the surrounding city.

2.2.10 This attribute is expressed in the property's *form* and *design*, *use* and *function*, and *location* and *setting* in several ways including, but not limited to, the following:

- The Tower of London's close physical relationship with the river, its proximity to the water, and siting on a bend to enhance its visibility both upstream and downstream
- The visible elements and line of the Roman wall

- The Tower of London's relationship to the city, namely, the purposeful siting of the Tower close to the City, but distinctly apart from it
- The wharf/river wall
- Key kinetic and fixed views of the Tower of London up, down, across and, importantly, from the river
- The Tower of London's skyline (silhouette) as seen from the river and from across the river (see Attribute 1 above)
- The open quality of the Liberties (on the Tower of London's landward sides)

3. Symbol of Norman power

2.2.11 The White Tower symbolises Norman power both in its massive masonry and its construction; its structure is principally made of rag-stone rubble with imported Caen stone dressings, later replaced with Portland stone. It was also crowned with a lead covered roof. The form and fabric of the White Tower is an outstanding example of Norman military and ceremonial architecture, crucial to the OUV of the site. A coherent, developed example of a form that had evolved incrementally in Normandy (notably at Ivry le Bataille), it is the example par excellence of an 11th-century fortress palace. Its plan and three-dimensional form survive substantially intact, despite late medieval and 17th-century modification to the interior and the fenestration.

2.2.12 This attribute is expressed in the property's *form* and *design*, *materials* and *substance*, *use* and *function* and *location* and *setting* in several ways including, but not limited to, the following:

- The fabric of the White Tower, particularly the Caen and other types of stone used in its construction
- Its plan and three-dimensional form
- Its relationship to the adjacent foundations of the remains of the Roman land and river walls

4. Physical dominance of the White Tower

2.2.13 The White Tower expressed the power of the Norman conquerors through domination of its environs. Its dual role, of both protecting and providing a defence against the City, was evident: it literally 'towered' over its surroundings until the 19th century. Although this dominance has gradually been eroded as the scale of the surrounding city has subsequently grown, it can still be appreciated, especially where the White Tower's silhouette can be seen against clear sky.

2.2.14 This attribute is expressed in the property's *form* and *design*, *materials* and *substance*, *location* and *setting* in several ways including, but not limited to, the following:

- The fabric and physical form of the White Tower
- Its iconic silhouette against the sky. This is experienced from a number of locations, including in the world-famous kinetic views from the south bank of the Thames (for example LVMF protected view 25A.1-3), the kinetic views from Tower Bridge including from the North Bastion (LVMF protected view 10A.1), downstream views from London Bridge (an example of which is LVMF protected view 11B.1-2), and kinetic views from the river itself

5. Concentric defences

2.2.15 The concentric defences around the White Tower, which were constructed in the later 13th and 14th centuries, represent a model example of the development of a medieval fortress palace. The concentric defences of earthworks and walls added by Henry III and Edward I made it one of the most innovative and influential castles of its time in Europe. Although adapted, altered and restored through the centuries, the extant defences (including the remains of the barbican) are substantially medieval work. The open space of the Liberties, beyond the moat is related to its military role and these form an important aspect of the property's setting.

2.2.16 This attribute is expressed in the property's *form* and *design*, *materials* and *substance*, *use* and *function* and *location* and *setting* in several ways including, but not limited to, the following:

- The visible structure and three-dimensional form of the concentric defences (walls, including gates, towers and bulwarks; earthworks, including the moat and its retaining walls)
- The character and legibility of the moat and liberties as a defensive landscape, which makes a critical contribution to the concentric defences of the Tower of London
- Remaining structure and form of the barbican
- Buried archaeological remains of components superseded or altered
- Presence of the wall-walks and their visual linkage with the surrounding defences, cityscape and river, which demonstrate use and function

6. Surviving mediaeval remains

2.2.17 Buildings, structures and buried remains of the medieval and early modern palace survive. Within the defences, there are substantial parts of the ensemble of royal buildings that evolved from the 11th to the 16th centuries. They include not only domestic buildings, but some associated with the development of state institutions, including the Public Records, Ordnance, Royal Mint and the Wardrobe. The latter is the origin of the Tower of London as the home of the crown jewels.

2.2.18 This attribute is expressed in the property's *materials and substance*, *use and function, location* and *setting* in several ways including, but not limited to, the following:

- The surviving buildings, which, as well as the White Tower and towers and gates of the concentric defences, include the remains of early 13th century royal lodgings, and the Chapel of St Peter ad Vincula
- Buried remains, particularly those of the medieval palace

- Tangible links with the state institutions established in the Tower of London, including Mint Street (between the inner and outer concentric defences) and the remains of the mint, and the Royal Armouries

7. Historical physical associative evidence

2.2.19 Physical evidence of the imprisonment, torture and execution of prisoners, particularly that left by prisoners of conscience and opponents of the crown since the 15th century, provides tangible links with events that have influenced the course of English and European history, including the execution of three English queens. The site helped shape the story of the Reformation in England, as Catholic and Protestant prisoners recorded their names on the walls of cells and the survivors their experience of imprisonment and torture there. This role dominates the modern symbolism of the Tower of London.

2.2.20 This attribute is expressed in the property's *use and function*, *traditions*, *spirit and feeling* in several ways including, but not limited to, the following:

- The dungeons and cells, illustrating how historic prisoners were confined and tortured
- The Royal execution site, depicted in many contexts and representations and associated, particularly, with the execution of Anne Boleyn
- The Water (Traitor's) Gate, symbolically the gateway to incarceration and potential execution
- Historic graffiti left by prisoners, providing a unique record of their experiences

2.2.21 It should be noted that, as mentioned above at the time of inscription, the State Party proposed criterion (vi), in addition to criteria (ii) and (iv), as justification for the Tower of London's inscription, but this was not accepted by the World Heritage Committee. Criterion (vi) requires a potential WHS property to "be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, or with artistic and literary works of outstanding universal significance" and the Committee considered that this requirement was not met at the Tower of London. Although reference is made in this Plan to the contribution made to the

Tower's OUV by, for example, the traditions and myths associated with it, and how these need to be managed in a way that respects its OUV, such characteristics cannot formally be defined as 'attributes' without a re-submission to the World Heritage Committee.

2.3 Setting of the WHS and Contribution to OUV

2.3.1 The Tower of London is an iconic landmark and symbol which sits at the heart of our national and cultural identity, and at the centre of London, the UK's capital city. The setting of the Tower, in common with other major historic fortresses, places of power, and national symbols, is central to its significance and its OUV.

2.3.2 It is readily apparent from the previous section that the setting of the site is important, and in many cases fundamental, to the following attributes of OUV, and our ability to appreciate them:

1. An internationally famous monument
2. Landmark siting
3. Symbol of Norman power
4. Physical dominance of the White Tower
5. Concentric defences
6. Surviving mediaeval remains

2.3.3 Additionally, the setting of the site, is also critical to the Property's Integrity, and as set out in the Statement of OUV, to a degree, its Authenticity.

2.3.4 The Tower of London is not however an isolated monument, divorced from its surroundings. It sits in a dense, changing, urban environment with a history stretching back to before the foundation of the Tower. Historically, the Tower of London exercised control over its setting through its domination by absolute height, and it still influences the shaping of the wider city beyond its boundaries.

2.3.5 The OUV of the Tower of London recognises its landmark siting for protection and control of the Thames and the City of London. Whilst the Tower of London's presence on the skyline has been eroded and it no longer towers over its

surroundings as it did until the 19th century, the impression of great height and dominance it once gave can still be appreciated.

2.3.6 In this context, notable aspects of its setting, which contribute to and support its OUV and hence need careful curation and conservation, include:

- Its historic, visual and functional relationships with the River Thames. This includes its role as a foreground for views from the south, east and west; and the fundamental rationale for its placement to act as a gateway to the kingdom and London – these relate to Attributes 1, 2, 3 and 4
- Its historic and continuing visual and physical dominance over this part of London and the River Thames, this includes – this relates to Attributes 1, 2, 3, 4 and 5
- Its world-famous silhouette with clear sky behind the White Tower, particularly in kinetic views[10] from Tower Bridge (including its North Bastion), the South Bank, and the river itself – this relates to Attributes 1, 2, 3, 4 and 5
- Its historic relationship with the City, for both protection and control of the City of London, and its distinct visual and physical separation from it, which provides a sense of breathing space between the Tower of London, its Liberties and the built mass of the City – this relates to Attributes 2, 3 and 4
- The open nature of the Liberties partially surrounding the site, which help maintain a strong sense of separation between the Tower of London and the City – this relates to Attributes 2, 3, 4 and 5
- The physical and visual relationships between the site and associated historic sites e.g. the London Wall and Trinity Square scaffold site – these relate to Attributes 3, 5 and 6
- A range of kinetic views from within the boundaries of the Fortress, often from The Wall Walks, within the Moat, or within the Outer Ward that

[10] Kinetic views are intended to operate as the viewer moves through areas.

enable an appreciation of its defensive structures - these relate to Attributes 2, 3, 4 and 5

- Kinetic views from within the Inner Ward that express its separation from the wider city, and which help reveal its more domestic and functional character – these relate to Attributes 1, 2, 3, 4, 5 and 6
- Key historic landside approaches and the views and experience of the Tower of London they afford, particularly from the direction of the City – these relate to Attributes 1, 2, 3 and 4
- A changing character to its setting reflecting both daily and seasonal fluctuations. For example, lighting of the external walls and tower at night reinforces its iconic and landmark presence, while the internal domestic spaces remain darker and more separate. Seasonally, the tree cover ebbs and flows revealing and partly concealing the site's architectural form as the year cycles through. These diurnal and seasonal aspects contribute to Attributes 1, 2, 3 and 4

2.3.7 These are however just some aspects of the site's setting that need to be taken into account. As set out in Section 5.7, the evidence base describing the setting, and its contribution to OUV, is outdated and needs to be updated. This will lead to a clear statement that fully articulates the contribution of setting to OUV, and a likely update and expansion of the Attributes of OUV discussed above.

2.4 Associated values of national and local significance

2.4.1 Previous iterations of the Management Plan identified a suite of significant values at national and local levels in addition to the Attributes of OUV of the site. While not part of the Tower of London's OUV, these associated values greatly enhance the Tower's historical and cultural heritage. They highlight the Tower's role not only in global history but also in shaping local and national identity, emphasising its enduring importance.

2.4.2 The identified associated values of national and local significance are:

- The origins of an historic awareness of architecture

- A centre of national spectacle and ceremonial
- Traditions of the Tower of London
- The artistic response to the Tower of London
- Symbol of the punitive power of the monarchy
- Commemorative
- Living, working community

The origins of an historic awareness of architecture

2.4.3 The period between 1825 and 1888 saw a radical transformation of the Tower site from a crammed complex of buildings from all periods, to an identifiable 'medieval' castle. The Tower of London is particularly significant in the development of an appreciation of the evolution of the Gothic style. Antiquarianism and renewed interest in medieval architectural styles coincided in the 19th century with a Romantic fascination for the Tower of London as a theatrical setting for some of the darker passages of English history.

2.4.4 Anthony Salvin, one of the leading exponents of the Gothic Revival, was commissioned to restore the Beauchamp Tower in 1852. The project was so successful that Salvin was given responsibility for the whole Tower. In essence, Salvin 'restored' the buildings he worked on, most famously, the Beauchamp, Salt, and Wakefield Towers to the appearance they were considered to have had originally. He also restored the fenestration of the Chapel windows in the White Tower, and remodelled the interior of the top floor (which was subsequently changed back in the 1960s).

2.4.5 Salvin's restoration work was founded upon the principles of the authenticity of medieval building design, and provided a foundation for modern day archaeological appreciation of historic built structures. The Tower of London is a significant example of the effects of the Gothic Revival on surviving medieval architecture, and followed the acclaimed restorations undertaken by Salvin at Newark, Carisbrooke and Caernarvon Castles. Salvin was aware of the work of the great Gothic Revivalist Viollet-le-Duc and it is fair to say he shared Viollet-le-Duc's vision of the pre-eminence of medieval architectural forms. He was, like the Frenchman, a crucial Gothic Revivalist.

2.4.6 Salvin's and his successor, John Taylor's, approach was strongly dictated by a 19th century idea of what a medieval castle should look like. Taylor prompted one of the earliest recorded debates about the conservation of historic buildings by demolishing the Record Office next to the Wakefield Tower. The Society for the Protection of Ancient Buildings (SPAB) bitterly opposed Taylor's 'recreation' of a

mythical medieval structure, preferring the integrity of genuine architectural survivals. The mythology of the Tower of London as an imposing, 'Gothic' fortress proved very strong, and had a profound effect on the fabric of the buildings.

A centre of national spectacle and ceremonial

2.4.7 From at least the early 14th century, the Tower of London was the traditional starting point for the Coronation procession of a significant number of medieval and Tudor monarchs. There are many records of the extraordinary magnificence of these celebrations. The now discontinued initiation of the Knights of the Order of the Bath is an important part of the history of coronation processions from the Tower of London. The Knights took ritual baths prior to keeping an all-night vigil in St John the Evangelist's chapel in the White Tower, on the eve of a coronation. In the morning, they were created Knights, and then escorted the sovereign in the coronation procession from the Tower to Westminster. Henry IV initiated the custom, and Charles II was the last to perform it, in 1661.

2.4.8 A few choice, smaller scale ceremonies are still carried out at the Tower. The forms of the ceremonies date from the 19th century, but their origins are often much older. These include the purportedly 700-year-old Ceremony of the Keys, and the relatively modern Ceremony of the Lilies and Roses to commemorate the death of Henry VI. The Tower is one of the oldest gun salute stations in the country, the earliest recorded salutes being for the coronation of Anne Boleyn in 1533. Gun salutes are still fired from the Tower on many important occasions, such as The Queen's birthdays and the State Opening of Parliament. The continuity of these ceremonies at the Tower adds to its importance as a touchstone, over the centuries, for ritual and national celebration.

Traditions of the Tower

2.4.9 The traditions of the Tower of London are fundamental components of its identity as a national icon. The Yeomen Warders, popularly known as Beefeaters, have become inseparably linked with perceptions of the Tower. The Yeomen Warders were originally part of the royal bodyguard, and now chiefly perform duties connected with ceremonials, security, and with guiding the many visitors to the Tower. The ravens have their place in the mythology of the Tower and are

protected by the legend that the Tower and kingdom will fall should they ever leave.

2.4.10 The tradition of the Tower of London as a visitor attraction by prior appointment has its roots in the 16th century. The 19th century saw the introduction of a ticket office at the Tower. Visitor attractions included the Tower Armouries, the Menagerie, the Jewel House and, until the Interregnum, the institution of the Great Wardrobe, of which the Jewel House was an offshoot.

2.4.11 The Tower Armouries have great significance as they form the earliest museum display in the country, with historic armour being displayed from the late 16th century onwards. The Royal Menagerie was originally for the entertainment of the monarch, but, by Elizabeth I's reign had become a public attraction. The Menagerie formed the basis of London Zoo, and eventually left the Tower in 1831-2. State regalia and precious items were displayed to visitors from the early 16th century onwards, and the Coronation regalia joined them at the Tower after the Restoration. The Crown Jewels were displayed in many different buildings around the Tower, before finally being installed in the current Jewel House in the Waterloo Barracks. Their resonant presence adds to the status of the Tower of London as national icon.

The artistic response to the Tower

2.4.12 William Shakespeare, another national icon of international significance, incorporated the Tower of London into a number of his plays. He used the Tower as a backdrop to his history plays, revolving around the Wars of the Roses. Most notably, in Richard II, where the White Tower is referred to as 'Julius Caesar's Tower', in Richard III, where the Duke of Clarence is drowned in a butt of Malmsey, and in Henry VI.

2.4.13 Pictorial artistic representations of the Tower range from the topographical to the romantically fanciful. The Tower has been represented in image form since medieval times, appearing as a schematic representation of a castle building. The first known non-schematic representation appeared in a late 15th century book of poems by Charles, Duke of Orleans, illustrating his time as a prisoner

there. Topographic artists such as the 16th century Wyngaerde, and Hollar of the 17th century portrayed the Tower in drawings and engravings.

2.4.14 This tradition continued into the 19th century with draughtsmen and artists from the Ordnance Drawing Room, such as Paul Sandby, making a contribution. As well as appearing as the central architectural image, the Tower often formed the evocative backdrop to scenes of daily London life on the river and in its environs. The fire of the Grand Storehouse in 1841 provided an opportunity for dramatic representations. J.M.W. Turner was amongst the artists who chose to represent the conflagration.

2.4.15 The Tower of London was also depicted in portraits of high status ex-prisoners, or of those who had commanded the Tower. As the late 18th and 19th century progressed, the Romantic interest in the mythology of the history of the Tower manifested itself in paintings depicting the more notorious events which took place there. Millais' 'Princes in the Tower' and Delaroche's 'Execution of Lady Jane Grey' are two such examples. W. Harrison Ainsworth's influential novel about the Tower is also of this school. In the present day, the Tower features strongly in the historical novels by Hilary Mantel, 'Wolf Hall' and 'Bring up the Bodies', about the life of Thomas Cromwell. The life of the Tower as a visitor attraction and site of state institutions found both humorous and serious expression in the art of Thomas Rowlandson, amongst others, in the early 19th century.

Symbol of the punitive power of the monarchy

2.4.16 Another institution developed at the Tower of London was the State Prison. This role began in 1100 with Bishop Flambard and reached its apogee in the Tudor period.

2.4.17 However, the Tower remained the prison of first choice for political prisoners and those accused of crimes against the state, particularly during periods of civil or national unrest. Parliamentarians, Jacobites and early 19th century radicals were incarcerated here, in part at least because of the Tower's reputation and image

as the ultimate stronghold. Even in the 20th century, German prisoners spent time at the Tower, and some were executed as spies.

2.4.18 Along with the imposing fortress architecture of the Tower, its use as a prison and occasional place of torture and execution helped to instil a sense of the punitive power of the Monarchy or the State in their subjects. Indeed, the popular image of the Tower of London as a bloody place of terror is long-established, although the more detailed 'romanticised' image of dripping dungeons is largely an invention of Victorian fiction. Medieval monarchs certainly encouraged the idea that the Tower was a place of strength to be feared, and this added to a sense of the monarchy being unyielding and despotic. For example, the Benedictine monk Matthew Paris tells us that the citizens of London rejoiced when Henry III's imposing West Gate collapsed, for they identified the fortified structure with their possible incarceration and disappearance. The Barons of the realm refused to meet King Henry at the Tower, for fear of being imprisoned within its walls.

Commemorative

2.4.19 Whilst tales of torture, execution and imprisonment at the Tower of London have been exaggerated to dramatic effect over the centuries, the fact remains that numerous people have suffered within its walls. Men and women of religious conviction were incarcerated, in some cases for large periods of their lives. Some were tortured at the Tower, and a handful was executed on Tower Green. A much greater proportion was executed on Tower Hill. Prisoners of conscience, such as Sir Thomas More, and victims of conspiracy and the changing tides of historical fortune, such as Anne Boleyn and Lady Jane Grey, deserve remembrance. The inscription-covered rooms in the Beauchamp and Salt towers, the Tower Green scaffold site, and the burial place in front of the altar in St Peter ad Vincula all contribute towards a sense of the Tower serving as a memorial for the persecuted, the imprisoned and the executed.

Living, working community

2.4.20 The Tower of London has traditionally been, and remains, a living and working community, currently comprising the Constable of the Tower, Resident Governor and Tower Officers, the Yeoman Warders and their families, plus a small, but

significant, raven population. The Tower houses the Regimental Headquarters of both the Royal Regiment of Fusiliers (RRF) and the Princess of Wales's Royal Regiment. The RRF was formed in 1968 following the amalgamation of former regiments including the Royal Fusiliers (City of London Regiment), which itself was founded in 1685 to protect the royal guns within the fortress. There is a strong historical association between the Royal Regiment of Fusiliers and the Tower. The Regimental Museum, managed by the Regiment and open to visitors, is located on the site. Accommodation is also provided for the military guard which is responsible for the protection of the Crown Jewels and ceremonial duties. In addition, the Tower houses offices of the Royal Armouries and the Chapels Royal with their tradition of worship and music.

2.4.21 This community sustains the intangible history of the Tower. The Constable of the Tower is an office dating back to 1066 in an almost unbroken line. Appointed by the Sovereign, his role is mainly ceremonial, although he is now also a Trustee of Historic Royal Palaces. Key members of the Tower management, including the Governor and Deputy Governor, are also 'Tower Officers', filling ancient appointments as well as Historic Royal Palaces' full-time posts, and are residents of the Tower of London.

3.0 GOVERNANCE AND MANAGEMENT ARRANGEMENTS

3.1 Introduction

3.1.1 This section covers the governance and management responsibilities for the Tower of London.

3.1.2 It outlines the governance structure and matrix management approach to decision-making. It provides an overview of the comprehensive management framework, including the Tomorrow's Tower master programme, the Conservation Management Plan, the State of the Estate report, and financial planning tools, which guide the site's long-term stewardship. Finally, it outlines the role of the WHS Management Plan in aligning strategic efforts and ensuring the conservation and sustainable development of the Tower of London's OUV.

3.2 Ownership and management responsibilities

Ownership

3.2.1 The Tower of London is owned by The King 'in Right of Crown'. His Majesty holds the property in Trust for the next monarch and by law cannot sell, lease or otherwise dispose of any interest in the property.

Management

3.2.2 The Tower is cared for by Historic Royal Palaces (HRP), an independent charity dedicated to the conversation and public engagement of six historic sites connected with the Royal history of the UK, namely:

- The Tower of London;
- Hampton Court Palace;
- Hillsborough Castle;
- Kensington Palace;
- Kew Palace, The Royal Kitchens, The Great Pagoda and Queen Charlotte's Cottage (all in the Royal Botanic Gardens, Kew WHS); and
- The Banqueting House.

3.2.3 HRP operate the Tower of London under contract with the UK Government and are solely responsible for the management of the World Heritage property in terms of its conservation, activation, and operation.

3.2.4 HRP's Charitable Objects are defined as follows:

"For the benefit of the nation:

(a) to manage, conserve, renovate, repair, maintain and improve the palaces ("the palaces" being the Tower of London; Hampton Court Palace; the State Apartments and Orangery at Kensington Palace; the Banqueting House, Whitehall; Kew Palace with Queen Charlotte's Cottage; and other palace or property considered by the trustees to be of royal association and historic and/or architectural importance and agreed by us and our secretary of state; together with any associated gardens, lands, buildings and contents other than the collection of the Royal Armouries) to a high standard consistent with their status as buildings of royal association and historic and/or architectural importance; and

(b) to help everyone to learn about the palaces, the skills required for their conservation and the wider story of how monarchs and people together have shaped society by providing public access, by exhibition, by events and education programmes, by the preparation of records, by research and by publication and by such other means as are appropriate."

External Oversight and Consent

3.2.5 Due to the Property's various designations (see Section 2.4), HRP are required to seek consents from DCMS, Historic England and / or the London Borough of Tower Hamlets for certain forms of work within the boundary of the World Heritage Property. This provides external oversight and control of the management of change within the World Heritage Property. To aid this process, HRP maintain close working relationships with Historic England and the planning authority.

3.2.6 Due to the status of the land, HRP are entitled to undertake some works under Crown Permitted Development Rights (CPDRs). These works are limited to operational and / or security matters and include strictly defined permitted changes in relation to small ancillary buildings, lamp standards, information, kiosk's, shelters, seats, telephone boxes, barriers, plant and machinery, hard surfaces, gates, fences, walls and CCTV cameras.

3.3 HRP Organisational structure

3.3.1 HRP is a major national charity established by Royal Charter. It is governed by a voluntary Board of Trustees, consisting of a Chair and 11 Trustees. The Chair is appointed by The King on the advice of the Secretary of State for Culture, Media & Sport. A further four Trustees are appointed by The King, of which three are 'ex officio' appointments, including the Director of the Royal Collection; the Keeper of the Privy Purse; and the Lord Chamberlain[11]. The remaining seven Trustees are appointed by the Secretary of State, two are 'ex officio' appointments: the Constable of the Tower of London; and Chair of Historic Royal Palaces' Campaign Board.

3.3.2 Trustee Working Groups are involved with and advise on specific areas of operation and strategy. The Palaces & Collections Trustee Working Group provides oversight of the Management Plan for the Tower of London.

3.3.3 HRP's Executive Team of eight directors, led by the Chief Executive oversees a range of functions and site-specific responsibilities. They report directly to the Board of Trustees.

3.3.4 All directors are involved in the decision-making that affects the Tower of London, due to cross-divisional responsibilities, however the Tower Director is responsible for the management of the Tower, its day-to-day operation and planning for the future.

[11] The Lord Chamberlain can choose to relinquish his appointment; in which case The King may appoint someone else.

3.3.5 Decision-making is collaborative across directorates with intersecting boards and working groups that oversee strategy and project implementation and the twice annual meeting of the Trustee Working Group.

3.4 The Tower of London World Heritage Site Consultative Committee

3.4.1 The Tower of London World Heritage Site Consultative Committee (WHSCC) organised by HRP, forms part of the management framework for the Site. Its primary role is to serve as a forum for discussion of issues affecting the Tower of London and its surroundings.

3.4.2 The Committee is committed to identifying and helping to address issues affecting the World Heritage Site, monitoring the implementation and success of the Management Plan, promoting coordination among member organisations, reviewing project reports from relevant bodies, and overseeing updates to the Management Plan.

3.4.3 In addition to HRP, the Committee comprises representatives of the following organisations (in alphabetical order):

- City of London Corporation
- Department for Culture, Media and Sport
- Greater London Authority
- Historic England
- ICOMOS-UK
- London Borough of Southwark
- London Borough of Tower Hamlets
- Royal Armouries
- Royal Collection Trust
- Royal Fusiliers

3.4.4 Traditionally, a member of Historic Royal Palaces' staff has acted as the World Heritage Site Coordinator (a part-time commitment). At present, the post is externally filled by consultants.

3.4.5 The World Heritage Site Coordinator reports to the HRP Director of Palaces & Collections, who acts as the Chair of the Tower of London WHSCC. The coordinator is responsible for monitoring, reviewing and updating the WHS Management Plan for the site, arranging and reporting to the WHSCC, planning consultation and responding to applications that affect the WHS. The coordinator also liaises with other World Heritage Sites, government, and statutory and advisory bodies, to exchange information, identify best practice and represent the Tower of London at World Heritage meetings and supports the UK State Party (via Historic England) in its liaison with UNESCO.

3.4.6 The WHS Coordinator role is supported by an internal HRP Project Manager from the Surveyor of the Fabric & Projects team, who is responsible for local project management and liaison with wider HRP teams. This includes coordinating input from all relevant HRP departments to update and monitor the WHS Management Plan, the arrangement of the WHSCC annual meeting and supporting the WHS Coordinator with WHS reporting.

3.4.7 The full Terms of Reference for the Tower of London World Heritage Site Consultative Committee can be found in Appendix 1.

3.5 Management and policy framework for the site

3.5.1 The Tower of London is managed through an interconnected framework of plans and strategies designed to ensure effective governance and alignment of activities across the organisation.

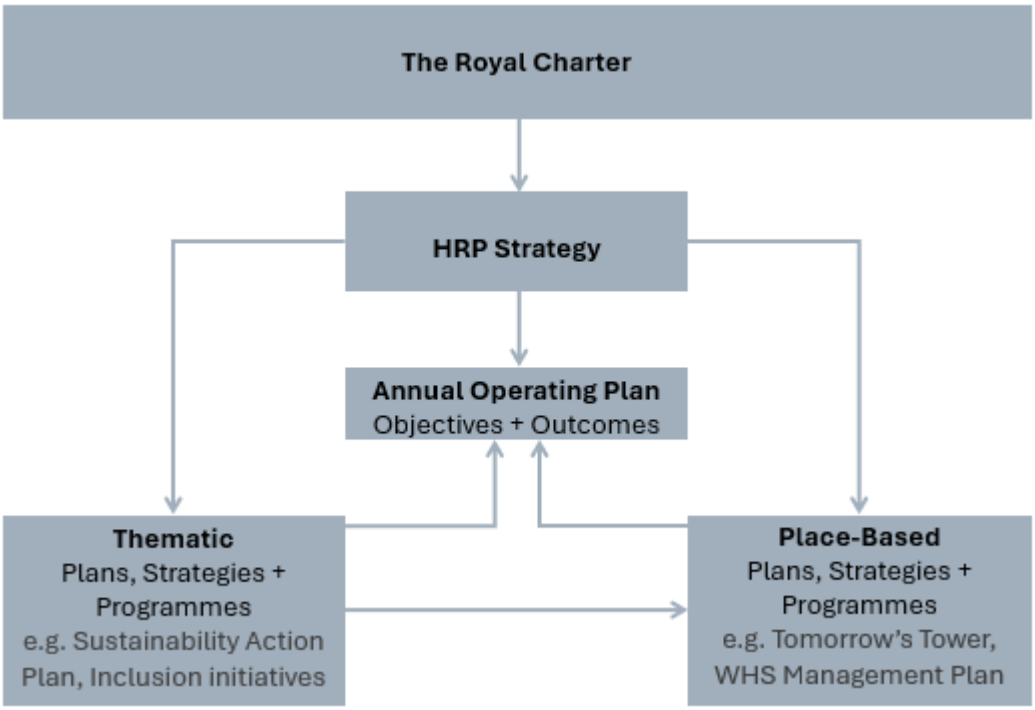


Figure D. Management framework

3.5.2 At the core of the management framework is HRP's overarching *Charity for Everyone* Strategy, which provides direction for all activities and ensures consistency across strategies and operations. This strategy underpins HRP's mission, values, and strategic priorities, and is outlined below:

'Who We Are

We are the independent charity that loves and looks after six of the most wonderful palaces in the world. The palaces are the setting for stories that shape us all, and we're bringing these to people in ways that mean more to them. We want everyone to find themselves in the spaces and stories we share.

Our strategy is to become a charity for everyone.

Our enduring commitment is that we will always love and look after the palaces in our care, open them to the public, generate the income to make it all possible, and achieve our goals through our people.

Our Royal Charter objects are to manage, look after and improve the palaces to a high standard consistent with their status; and help everyone to learn about the palaces, their stories and what it takes to look after them.'

3.5.3 This strategy is supported by a number of detailed plans and frameworks, each addressing specific aspects of site management on either a thematic basis or place-specific basis.

3.5.4 Oversight is provided by various boards and working groups, that ensure that all efforts are aligned with the site's goals. Implementation is tailored to meet site-specific needs.

3.5.5 Key elements of the management framework for the Tower of London include:

- The Tomorrow's Tower master programme, which consolidates various departmental ambitions under the HRP strategy, including expanded educational facilities, improved visitor experience, enhanced accessibility and interpretation, sustainability and climate change improvements (not just relating to the landscape) and planned maintenance works, which are addressed through a rolling schedule of works to meet ongoing conservation needs. It is being developed to transform the site so that it is ready for the challenges of the future.
- The Conservation Management Plan, which is reviewed and updated on a quinquennial basis, and guides long-term conservation efforts and places conservation at the heart of all activities.
- The State of the Estate report, which monitors and tracks the condition of the property through regular inspections, identifying areas in need of attention.
- The State of the Interior Estate report, which relates to HRP's collections, including wall and ceiling paintings, statuary and monuments.

- Curatorial and Collections works, which include preventative conservation measures being carried out to safeguard the site's structures and collections.
- Operational planning, which is organised around a three-year rolling cycle, with a detailed annual operating plan and forecasts for the following two years.
- Financial planning, which is organised around a three-year rolling cycle, with a detailed budget for year one and forecasts for the following two years, and is supported by a 10-year forecast provided by the Finance Director.
- HRP Policies and Procedures, including Collections Management, Research Code of Conduct, Research Ethics, Fire Risk Management, Major Incident Planning, Human Remains Policy, Environmental and Sustainability, Access and Security.
- Reactive and Routine Maintenance works to keep the palaces safe, secure and operational.
- The Landscape Management Plan, which is being reviewed and updated in 2025 and guides the development of planting and landscaping on site, considering sustainable management, the future impact of climate change and how planting can improve visitor experience and wellbeing whilst respecting historic character.

3.5.6 A key partnership is in place between the Royal Armouries and HRP that enables collaborative activity across shared spaces and ensures clarity in roles and responsibilities. A Memorandum of Understanding (MoU) is regularly updated. The Constable of the Tower plays a unique governance role as a Trustee of both organisations; a structure that has deliberately been maintained since the inception of the MoU to foster cohesion and mutual understanding.

3.6 The Role of the World Heritage Site Management Plan

3.6.1 Section 1.4 sets out the role of the WHS Management Plan in the context of the property's management framework. In summary, the plan supports managers and stakeholders in ensuring that the Tower of London's OUV is recognised, conserved, and celebrated. It is designed to align with other key governing documents, themes and strategies.

3.6.2 While it is not the primary managerial document; it is a critical element of the wider management framework for decision-making. One of its key roles is enabling the monitoring of the effectiveness of wider management decisions and strategies in safeguarding the OUV of the WHS.

3.6.3 It also functions as a tool for collaboration across departments and external stakeholders. It serves as a reference point for long-term planning and project development, ensuring that all activities are consistent with the values set out in the World Heritage Convention and that the Tower of London's OUV is safeguarded.

3.6.4 The WHS Management Plan is also a material consideration in the planning process for developments within and outside of the WHS. As outlined in the Planning Practice Guidance: Historic Environment[12], Management Plans for WHSs should be taken into account when preparing development plans and making decisions on planning applications[13]. This is to ensure that any potential impacts on the OUV of the WHS are fully considered and mitigated.

3.6.5 The Plan also fulfils requirements set out in the *Operational Guidelines for the Implementation of the World Heritage Convention*[14], particularly paragraphs 108 to 112, which set out expectations for effective management systems that ensure the long-term conservation of OUV.

3.6.6 As per paragraph 108, the Management Plan lays out steps for protecting and preserving the property's OUV (see Sections 7 & 8), developed through a participatory process. In line with paragraphs 109 and 110, the Plan ensures the

[12] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment
[13] *Paragraph: 034 Reference ID: 18a- 034-20190723*
[14] https://whc.unesco.org/en/guidelines/ - these are subject to regular update

effective protection of the nominated property for present and future generations, taking into account its unique cultural context.

3.6.7 It embraces the key elements outlined in paragraph 111, including an understanding of the property's values, inclusive and participatory governance, a clear planning and monitoring cycle, assessment of vulnerabilities and impacts, coordination among stakeholders, adequate resourcing, capacity building, and transparent, accountable structures. The Plan also embodies the integrated approach promoted in paragraph 112.

3.6.8 The plan has been prepared by HRP and the WHS Coordinator, following extensive consultation with relevant members of HRP’s teams. Further consultation was carried out with the members of the World Heritage Site Consultative Committee, the Palaces and Collections Working Group, and the Board of Trustees.

4.0 SECTION 4. EXTERNAL FRAMEWORK – LEGAL, POLICY AND GUIDANCE

4.1 Introduction

4.1.1 This section outlines the framework of legislation and local, regional, and national policy that govern the management of change in and around the Tower of London.

4.2 Legislation

4.2.1 The Tower of London's designation as a scheduled monument, numerous listed buildings, and conservation area mean that the provisions of the following two Acts apply:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- Ancient Monuments and Archaeological Areas Act 1979

4.2.2 A range of other primary and secondary national legislation will include provisions relevant to the WHS, such as the General Permitted Development Order, with those listed in this plan being of particular relevance.

Proposed Changes to the Statutory Status of World Heritage Sites

4.2.3 Section 102 of the Levelling Up and Regeneration Act (2023) includes proposed amendments to the 1990 Town and Country Planning Act (Section 58B) that would make World Heritage a statutory designation. This provision would require the decision-makers to *"…have special regard to the desirability of preserving or enhancing the asset or its setting*."

4.2.4 As clarified in the Act, "…*preserving or enhancing a relevant asset or its setting includes preserving or enhancing any feature, quality or characteristic of the asset or setting that contributes to the significance of the asset*." For the purposes of the Act the significance of a WHS is its Outstanding Universal Value.

4.2.5 At the time of writing, these changes have not been brought into effect.

4.3 International Conventions

4.3.1 The inscription of the Tower of London onto the World Heritage List places a significant obligation on the UK Government, under the terms of the *1972*

Convention Concerning the Protection of the World Cultural and Natural Heritage, to do all that it can, and to the utmost of its resources, to protect, conserve, present and transmit to future generations the Outstanding Universal Value of the Tower of London WHS. This obligation includes the management of change outside of the site that may affect its OUV.

4.3.2 It is accepted that the effective implementation of legislation and national, London-wide and local planning policy provides the primary mechanism for meeting these obligations.

4.3.3 The implementation of the 1972 Convention is supported by the Operational Guidelines for the Implementation of the World Heritage Convention (the Operational Guidelines) [15].

World Heritage Committee

4.3.4 The World Heritage Committee, composed of 21 elected States Parties to the World Heritage Convention, is responsible for its implementation. Supporting the Committee is the Secretariat, the World Heritage Centre, as appointed by the Director-General of UNESCO, which serves as a focal point within UNESCO for all matters relating to World Heritage.

4.3.5 The Committee also has three Advisory bodies:

- ICCROM (International Centre for the Study of the Preservation and Restoration of Cultural Property)
- ICOMOS (International Committee on Monuments and Sites)
- IUCN (The International Union for Conservation of Nature)

4.3.6 The Advisory Bodies support the Committee by advising on the implementation of its programmes and projects, helping to prepare documentation, and participating in Committee meetings in an advisory role.

[15] https://whc.unesco.org/en/guidelines/ - these are subject to regular update

4.3.7 They also offer expert guidance (in their respective areas of expertise) on the conservation of specific properties and on the potential impact of proposals on their OUV.

4.4 National Policy

4.4.1 The National Planning Policy Framework (NPPF) is a material consideration for decision-making related to the Property[16]. Paragraph 2 of the NPPF states that "*planning policies and decisions must also reflect relevant international obligations and statutory requirements*". This includes the *1972 Convention Concerning the Protection of the World Cultural and Natural Heritage*.

4.4.2 Historic environment matters, including World Heritage, are addressed in Section 16 of the NPPF: *Conserving and Enhancing the Historic Environment*, paragraphs 202 to 221.

4.4.3 This recognises that World Heritage Sites are of the highest significance; and that consequently great weight must therefore be given to the conservation of their significance (OUV) when making planning decisions and during the plan-making process. Paragraphs 213-215 provide key policy tests for developments that would harm the significance of designated assets (including World Heritage Sites). These clearly indicate that change in the setting of an asset can be harmful to its significance. Paragraph 219 provide further guidance, stating that "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

4.4.4 The accompanying National Planning Practice Guidance (NPPG) supports the implementation of the NPPF and provides further guidance on the management of World Heritage Sites.

4.5 Regional

[16] The version of the NPPF referenced in this plan was released in December 2024.

4.5.1 At the regional level, national policies are applied and interpreted by the Mayor of London through the London Plan 2021.

4.5.2 Chapter 7 of the London Plan focusses on Heritage and Culture. The following policies are of particular relevance to the Tower of London:

- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework

4.5.3 Policy HC2 states that: '…Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.'

4.5.4 Certain defined views that include the Tower of London are protected in the London Plan through Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework (LVMF). Accompanying this policy is the LVMF SPG (2012) which sets out guidance for managing designated strategic views and a process for assessing the impact of development on these views. The LVMF SPG (2012) is currently being updated.

4.5.5 The London Plan is supported by the *London's World Heritage Sites – Guidance on Settings SPG* (2012). This provides a methodology for assessing impacts. This guidance pre-dates the 2022 UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context, and Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017). Its use may therefore need to be adapted on a case-by-case basis to reflect more recent guidance.

4.5.6 Work on a new London Plan, and supporting documents, is currently underway, with a view towards adoption in 2027.

4.6 Local

4.6.1 London Borough's Local Plans play a critical role in shaping the development surrounding the WHS. Borough Plans must be in 'general conformity' with the London Plan and wider national policy.

4.6.2 Three local plans are of relevance to the Tower of London:

- Southwark Council Local Plan (adopted 2022), for the period 2019-2036.
- London Borough of Tower Hamlets Local Plan 2031 (adopted 2020) – the borough is currently preparing a new Local Plan
- City of London Local Plan (2015) - the new City Plan 2040 is currently being prepared.

4.7 Other Relevant Guidance

4.7.1 As evidenced, planning policy in England is well aligned with the protection and managerial requirements of the *Operational Guidelines*. However, a substantial body of additional guidance exists at the international, national, regional, and local levels. It is not the role of this Management Plan to provide an in-depth overview of this framework, however, the following list provides a selection of documents that may be particularly relevant to the management of the Tower of London. Many of these documents are subject to update and review, and the most up-to-date versions should always be referred to.

4.7.2 Other relevant guidance includes:

- UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022)
- UNESCO Convention for the Protection of Cultural Property in the Event of Armed Conflict with Regulations for the Execution of the Convention (1954)

- UNESCO Policy Document for the Integration of a Sustainable Development Perspective into the Processes of the World Heritage Convention (2015)
- UNESCO Policy Document on Climate Action for World Heritage (2023)
- ICOMOS Guidelines on Fortifications and Military Heritage (2021)
- Historic England Guidance on the Production of World Heritage Property Management Plans (2025)
- Historic England Historic England Advice Note 4: Tall Buildings (2022)
- Historic England Briefing: UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022)
- Historic England Advice Note 1: Conservation Area Appraisal, Designation, and Management (Second Edition, 2019)
- Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017)
- Greater London Authority Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (2023)
- Trinity Square Conservation Area Character Summary and Management Strategy Supplementary Planning Document (2014)
- Crescent Conservation Area Character Summary and Management Strategy Supplementary Planning Document (2012)
- Tower of London Conservation Character Area Appraisal and Management Guidelines (2008)
- Tower Bridge Conservation Area Appraisal (2003)

4.7.3 A Historic England Advisory Note on *Managing Change to World Heritage Sites* is in development.

5.0 SECTION 5. FACTORS AFFECTING THE PROPERTY

5.1 Introduction

5.1.1 The Tower of London was inscribed as a WHS for its Outstanding Universal Value, which is derived from its historical, architectural, and symbolic significance as an iconic fortress, royal palace, and prison, with a continuous history spanning over 1,000 years. This section identifies the key factors - positive and negative - that are currently affecting the property or may affect it in the future. The factors are considered in relation to their potential impact on the Attributes of OUV.

5.1.2 In particular, the analysis considers how these factors may influence the integrity of the Tower of London's built fabric and setting, and the authenticity of its function, use, and presentation. Understanding these connections is essential to ensuring that the Site continues to meet the conditions of OUV, and to inform decision-making, planning, and impact assessments in line with the *Operational Guidelines*.

5.1.3 Where possible, the factors are directly linked to the Periodic Reporting process[17].

5.1.4 The key factors addressed below are:

- Physical Conservation
- Visitor Management and Activation
- Operational and Residential Facilities
- Environmental Factors
- Organisational Governance
- Management of the Site's Setting

5.2 Physical Conservation

[17] Periodic Reporting is one of the core conservation monitoring mechanisms of the *World Heritage Convention*. States Parties are invited to submit to the World Heritage Committee a Periodic Report on the application of the *World Heritage Convention* in their territory. For further information, see: https://whc.unesco.org/en/periodicreporting/

5.2.1 The physical fabric of the Tower of London is a fundamental part of its OUV. Its conservation is therefore vital to safeguarding its historical and cultural significance.

5.2.2 Section 3.2 sets out HRP's Charitable Objects which state that their purpose is to "...manage, conserve, renovate, repair, maintain and improve the palaces ... to a high standard consistent with their status as buildings of royal association and historic and/or architectural importance". There is therefore a clear alignment between HRP's charitable purpose and the conservation requirements of the Tower of London.

5.2.3 HRP has an ongoing programme of repair and conservation works, guided by a full Conservation Management Plan (CMP) and rolling programme of condition surveys and inspections (see Section 3 above). The CMP provides a robust evidence base for decision-making in terms of conservation activity and offers a strategic, multidimensional approach that helps ensure the Tower's historical and structural integrity is maintained while addressing immediate conservation challenges and anticipating future needs.

5.2.4 Conservation works are managed through a structured, multi-year programme of work, which is shaped by 10-yearly condition surveys, with 5-yearly reviews of vulnerable areas. These surveys form the foundation for planning conservation efforts and monitoring emerging issues. In addition to this programme, ad hoc inspections and repairs are carried out as part of a wider maintenance system to address urgent localised issues.

5.2.5 All major conservation or restoration works require statutory consent from Historic England and are undertaken with their input to ensure alignment with best practices and compliance with required conservation standards.

5.2.6 Key ongoing and future challenges for the Tower of London's physical conservation have been set out in the CMP, and include:

- **Climate change**: The Tower is vulnerable to the effects of climate change. Increasing extremes of weather conditions, including temperature and

rainfall, risk increasing the rate of mechanical weathering to the historic building fabric, while fluctuations in relative humidity risk both building fabric and the collections kept within the Tower. Extreme temperatures may necessitate adaptations to buildings that may pose risks to the integrity of historic building fabric. Longer-term flood risk from the Thames, sea, and surface water is predicted to increase, leading to more frequent flood events in the moat. This includes the risk to the Tower from flash flooding due to an increased number of storm events and the impact of rising sea levels on low tide levels in the Thames. This is particularly significant for the moat, as it can only be drained when the Thames is at its lowest point, which will be above the levels afforded by the Thames Barrier in future. This increased flood risk poses a potential threat to the attributes and physical integrity of the TOL's OUV. Prolonged or repeated flooding may lead to water ingress, damage to historic fabric, and undermine the setting and cohesiveness of the defensive moat system. These impacts could, over time, affect the authenticity and completeness of the site. As a result, mitigation measures will need to be implemented.

- **Environmental risk**: Airborne pollutants, arising from the Tower's urban context and proximity to main roads pose a risk to fabric. UK Clean Air Acts and global efforts to reduce the levels of atmospheric sulphur dioxide and other pollutants have reduced this risk and it is considered to be low, but must be monitored.
- **Attack**: The Tower's status and the high number of visitors that it attracts mean it is a high-risk target for a potential terrorist attack. This poses a risk to visitors as well as potential damage to historic fabric. The security infrastructure required to mitigate such threats risks negatively impacting historic building fabric and archaeological deposits if it is not sensitively designed and installed. A strength of the HRP Major Incident Plan is the degree to which it has been tested with table-top and live exercises involving the emergency services.

- **Fire**: The Tower of London is vulnerable to fires caused by negligence, malicious actions, poor maintenance of equipment, faulty domestic appliances, or during construction work and events. Rigorous fire-safety controls and an ongoing programme of fire-compartmentation improvements reduce the risk, but the threat cannot be completely removed. A serious fire could cause catastrophic damage to an area of the Tower, and fire-fighting pose further due to secondary water damage. Additionally, unsympathetic fire-safety measures risk damaging significant historic fabric (see Section 6).
- **Wear and tear**: The Tower receives c. 3 million visits a year and hosts numerous commercial events. This funds essential conservation work but brings risks to the building fabric since large numbers of users can risk increased physical abrasion to building fabric and can be responsible for fluctuations in environmental conditions such as heat and relative humidity which can harm the building fabric and collections. Damage from vehicle strike is another possibility due to the TOL's location in a busy city.
- **Vandalism**: The large number of users and the scale of the site means that vandalism is an inevitable risk.
- **Encroaching change**: Commercial and user pressures, including the role of the Tower as a home for c. 150 people and a working space for several hundred more, means that there is an ongoing need for regular changes to the Tower's buildings and environs. These changes risk the incremental degradation of historic fabric and character if not handled sensitively.
- **Continued investment in conservation and maintenance works**: Much of the Tower is well-maintained to an acceptable standard, however there are some areas are in a poor state of repair. As charity HRP needs to balance priorities while meeting its charitable purpose and legal requirements. The Covid pandemic resulted in serious financial pressures for HRP which delayed some maintenance and conservation works. These backlogs are now being addressed through additional investment.

- **Accessibility**: HRP continues to seek ways to improve access for all to the site through reasonable measures, taking into account that access improvements that are not handled sensitively pose a risk to historic building fabric, archaeology, and the historic character of the Tower and its environs.

5.2.7 Addressing these issues will require continued investment, and innovative and adaptive solutions. The sustainability of the conservation programme depends on continued funding from both core budgets and external sources.

5.2.8 Sustaining the Tower's physical conservation efforts at a high standard relies on its ability to attract visitors to generate the essential revenue to support this vital work, relating to factor 4.13.5 of the Periodic Reporting.

5.2.9 Overall, the Tower is well cared for through structured systems and dedicated teams. Regular monitoring, such as through the State of the Estate report, is crucial for assessing present and future needs, ensuring conservation efforts remain adaptive to emerging challenges. The overarching works, plan and strategies ensure that all conservation actions align with the site's long-term needs, historical significance, and changing environmental conditions. This relates directly to the management of factors 4.1.4, 4.1.5, 4.7, 4.8.2, 4.8.6 and 4.10.7 of the Periodic Reporting.

5.3 Visitor Management and Activation

5.3.1 The Tower of London is the UK's most paid for heritage visitor attraction, receiving nearly 3 million visitors annually according to the Association of Leading Visitor Attractions. There are numerous challenges caused by the level of visitation, several of which might damage the Tower's OUV if not sensitively addressed, such as:

- Localised physical conservation issues due to wear and tear (see above)
- Visitor overcrowding at key locations
- Quality of visitor experience

- Need for additional infrastructure to meet visitor requirements (e.g. ticketing and entry) and the potential for that infrastructure to impact on OUV.

5.3.2 HRP has developed plans to address these issues and is actively working to improve visitor management and activation facilities through targeted projects that address the ongoing pressures on the site as part of Tomorrow's Tower (see Section 3.5). These include:

- Tower Entry project
- Moat Legacy project
- Ticketing and Visitor caps
- Inclusion initiatives
- Education

5.3.3 These all relate to factors 4.2.1, 4.7.8, 4.8.2, 4.8.5, 4.8.6, 4.10.6 and 4.13.4 of the Periodic Reporting.

5.3.4 These initiatives will see investment in the Tower's buildings, facilities and people to transform the Tower so that its historic assets can be best shared. They will ensure that it remains a source of pleasure, inspiration, surprise and delight for everyone. They will solve the problems of disjointed arrival, onsite overcrowding and poor accessibility that detract from today's experience, creating inspirational facilities for education with a world beating programme and best in class experiences for all visitors. Tower Stories will be shared in ways that will engage and involve visitors.

5.3.5 As part of these efforts, it is critical that both staff and visitors understand the Tower of London's status as a WHS to protect its OUV. Ensuring awareness and appreciation of the Tower's heritage significance will support sustainable and inclusive visitor management and help preserve its historical integrity for future generations.

Tower Entry Project

5.3.6 The Tower Entry Project, currently in the design stage, focuses initially on enhancing visitor flow by replacing the sentry boxes at the main entrance and improving the appearance of the queuing barriers on Tower Hill during busy periods. In a subsequent phase, the aim will be to create a more seamless arrival experience, with potential changes to the infrastructure on Tower Hill. This project is expected to streamline entry processes, reduce bottlenecks, and improve the overall visitor experience. It is being sensitively managed to ensure that improving visitor infrastructure does not negatively affect the site's OUV.

Moat Legacy Project

5.3.7 The Moat Legacy Project is an initiative that will activate underused spaces while connecting visitors to a key part of the Tower's environmental and historical context, which informs its OUV. In particular, the design will emphasise the defensive nature of the moat as a key element of the medieval castle's defensive design. The project will enhance the biodiversity and functionality of the moat area, creating new opportunities for education and community engagement. It will simultaneously investigate how historic sites can contribute against nature loss, through establishing the moat as a haven for biodiversity in the heart of the city. The Moat Legacy project will address future climate change issues such as water shortages, reducing the reliance on mains water and addressing the risk of flash flooding (see Section 5.5). It also includes the creation of a new open green space in the moat for use by local communities and schools.

Ticketing and Cap on Visitor Numbers

5.3.8 Managing peak visitor congestion is a critical issue at the Tower. Timed ticketing was introduced in 2020 as a means of preserving the site's integrity and improving the visitor experience by ensuring visitors arrive at staggered times.

5.3.9 Placing a cap on daily visit numbers alongside already introduced timed ticketing reduces congestion, improves the quality of visits, and preserves the site's integrity during peak times.

5.3.10 The Tower Entry project is complementary to these efforts with its goal of enhancing visitor flow and reducing overcrowding.

5.3.11 These measures are part of HRP's ongoing efforts to balance the demands of providing a quality visitor experience with preserving the physical fabric of the site.

Inclusion initiatives

5.3.12 Additionally, HRP aims to engage underrepresented groups, such as those with disabilities, ethnic minorities, low-income individuals, young adults, and the LGBTQIA+ community, through expanded educational, community and public programming and improved accessibility, thereby improving the quality of visitor experiences.

Education

5.3.13 Existing facilities are intended to be expanded through the provision of new educational spaces at the Reveller and Arches, parts of the Waterloo Block and the improvement of several ancillary spaces for lunchtime and community activities, with increased accessibility throughout. Overall, this ambitious roster of programmes will:

- Provide a dedicated welcome space for schools and community groups, relocating group processing away from the main entrance to improve visitor flow and experience, relating to factors 4.8.6 and 4.13.4 of the Periodic Reporting.
- Enable expanded programming in STEM education, biodiversity, and climate change, relating to factors 4.8.2, 4.10.6 and 4.13.4 of the Periodic Reporting.
- Provide new opportunities for visitor engagement with the Tower of London's rich history, relating to factors 4.8.2, 4.8.5 and 4.13.4 of the Periodic Reporting.
- Expand the education and community offer through increasing the Tower's reach and the depth of engagement with schools locally and nationally and creating stronger connections with local communities through a new community engagement programme. This relates to factors 4.8.2, 4.8.5 and 4.8.6 of the Periodic Reporting.

- Encourage lifelong learning through a new Adult Education programme, relating to factors 4.8.2 and 4.8.5 of the Periodic Reporting.

5.4 Operational and Residential Facilities

5.4.1 The Tower of London is an active, living heritage site, which houses residential and operational facilities that are essential to its daily functioning. The Royal Armouries plays a key role in the Tower's operational functions by managing the collections, displays and interpretation, as well as overseeing the site's archives, plans and records – many of which have only ever been kept at the Tower. It works collaboratively with Historic Royal Palaces on display content and curatorial input in shared areas, supporting the Tower's continuous use as both a working heritage site and a visitor attraction.

5.4.2 The Crown Jewels, kept at the Tower of London since the mid-17th century, further contribute to the Tower's continuous use. The living aspect of the Tower forms part of its OUV and wider significance and needs to be supported, enabled, and encouraged through the Tower's management.

5.4.3 Operational facilities include homes, and offices and facilities for the training of staff, including for parades and choreographed performances, are therefore important. Maintaining these at a standard for modern use, ensuing their continued viability for communities and users, and enabling their adaption and change to reflect shifting operational needs is a requirement for the future sustainable management of the Tower of London.

5.4.4 As set out the in CMP, there are potential conflicts between this requirement and the requirement to conserve other elements of the site's significance including its character and fabric (also see Section 5.2 above). A balanced approach is therefore needed to deliver the appropriate infrastructure to meet the requirements of the community while achieving conservation outcomes.

5.4.5 This balance needs to be achieved at all levels of change, from planning and delivering significant change and upgrades e.g. to address sustainability

requirements; through to day-to-day occupation of places. Clear guidance and support are required at all levels of decision-making and delivery.

5.4.6 For larger projects and interventions HRP uses a combination of in-house expert advice and Heritage Impact Assessments (HIAs) to inform and guide projects and proposals. Smaller interventions are controlled by the Standing Clearances, which contain agreed levels of work and are pre-approved by HE. However, there is a risk that the Standing Clearances policy is not always referred to, leading to instances in which small-scale harm can occur, this can lead to longer-term incremental cumulative harm. Smaller interventions are however constantly required to maintain the habitability and usability of the facilities. DIY work by residents is prohibited in the residents' license to occupy.

5.4.7 All of the above matters relate to 4.1.1, 4.1.4, 4.8 and 4.8.2 of the Periodic Reporting requirements.

5.4.8 Additionally, the Tower of London's iconic status makes it vulnerable to targeted security threats, in particular terrorism, as well as other anti-social activity (also see Section 3.2 above). The presence of the Crown Jewels also makes the site a greater target from a security perspective. These heightened risks have long been recognised and robustly responded to by HRP through comprehensive security planning and operational measures, and this aspect of site management aligns with factors 4.9.5 and 4.2.5 of the Periodic Reporting.

5.4.9 As mentioned in Section 5.2 above, the installation, management and maintenance of security infrastructure can result in harm to the fabric and character of the Tower; there is therefore a clear need to ensure that all such infrastructure is well designed in a way that achieves both security and conservation outcomes.

5.5 Environmental Risks

External factors posing risks to the Tower

5.5.1 As mentioned in Section 5.2, environmental risks, both local and global in scope, can affect the Tower of London. The impact of climate change, coupled with

other environmental challenges, requires careful management and considered intervention to ensure that these factors do not threaten the OUV of the Tower and its physical integrity.

5.5.2 Key issues include, amongst others, the following considerations (also see Section 5.2):

- Air pollution causing progressive stone discolouration and darkening
- The formation of black crusts on stonework
- Potential rise in sea levels affecting the tide levels in the Thames
- Flooding by the tidal River Thames
- Surface water flooding, particularly in the moat area
- The effects of climate change on heating and cooling cycles in the main buildings
- Changes in rainfall, particularly increases in overall levels of rainfall and extreme rainfall events. These changes may damage building fabric and cause surface water flooding. As a consequence, new larger guttering and downpipes may be required, which requires consideration from a conservation perspective
- The need to adapt to changes in tidal patters and storm water event by adapting the Victorian Culvert system under the moat, in particular, how it is discharged into the Thames

5.5.3 These relate to factors 4.4, 4.7, 4.10 and 4.13.4 of the Periodic Reporting.

5.5.4 The State of the Estate report measures these issues and provides regular monitoring of physical conservation at the site, ensuring that potential long-term impacts are caught early, contributing to the broader sustainable agenda.

5.5.5 In response to the above factors (and wider global issues) HRP developed a strategic risk assessment of climate change in 2022. This framework has allowed for the creation of a mechanism for identifying and responding to climate impacts at the property, ensuring that Tower's physical fabric, which is crucial to its OUV, is monitored and conserved.

5.5.6 The Moat Legacy project also aims to address future climate change issues such as water shortages by collecting and reusing water currently discharged into the Thames, reducing the Tower's reliance on mains water for landscape management and addressing the risk of flash flooding.

5.5.7 In terms of disaster responses arising from climatic and environmental risks, HRP are aware of the cumulative impacts of climate change on the properties in their care and have responded proactively by developing their own innovative risk assessments and response mechanisms. This relates to factors 4.10.7 and 4.13.4 of the Periodic Reporting.

5.5.8 HRP considers the protection and enhancement of the World Heritage Site and its OUV in its climate actions, in line with the UNESCO Policy Document on Climate Action for World Heritage (2023), ensuring that mitigation and adaptation efforts do not compromise the integrity or authenticity of the Site or its setting. Overall, HRP's current strategy aligns with three of the four key categories for climate action with respect to World Heritage properties outlined in the Policy Document (2023). These are:

(i) Assessing climate change risks

(ii) Climate change adaptation

(iii) Climate change mitigation.

5.5.9 Meanwhile, this Management Plan and its accompanying Action Plan lay the foundation for category *(iv) Knowledge sharing, capacity building and awareness* to be developed over the course of this Management Plan's cycle.

Sustainability and the Tower

5.5.10 As well as the impact of climate change and environmental factors on the Tower, HRP is also seeking to address the impact that running the Tower of London (and their other properties) has on the climate and environment.

5.5.11 As such, HRP have set out the bold goal of achieving nature-positive carbon net zero across their estates and value chain by 2050, supported by a Sustainability

Action Plan (SAP) (2024–2027) that outlines specific measures for emissions reduction and climate adaptation.

5.5.12 This will require changes in operations and also infrastructure. As discussed in Sections 5.2 and 5.4, installing new infrastructure e.g. the removal of gas boilers and their replacement with zero carbon systems, electrical upgrades, airflow management etc, can pose physical and aesthetic conservation issues. A balance will need to be struck, but it is inevitable that sustainability adaptations will be required and that these changes will need to occur, the only consideration is when and how. In this context a broad range of technologies and solutions will need to be explored and adapted for use in the Tower.

5.5.13 To support this, HRP is an active member of a wider informal sustainability managers network, and collaborates with other World Heritage Sites in the UK including Greenwich and Kew to discuss approaches and share innovations.

5.5.14 Sustainability at the Tower extends beyond electrical and heating adaptions and includes a range of other interventions including proposals for significant biodiversity and water management improvements through the Tomorrow's Tower programme and its proposals for the moat (see Section 3.5).

5.5.15 All of the above relates to factors 4.13.5 and 4.13.6 of the Periodic Reporting.

5.6 Organisational Governance

5.6.1 As set out in Section 3 of this plan, the governance of the site itself operates within a well-structured framework guided by the overarching strategy, with clear alignment between HRP's values and purpose and the long-term conservation needs of the Site. The framework enables correlation between operational and organisational goals, promotes effective decision-making, and encourages collaboration across all levels of the organisation.

5.6.2 The management and governance system has a positive impact on the site, relating to sections 4.13.3 and 4.13.4 of the Periodic Reporting.

5.6.3 While the overall organisational governance of the site is positive, an area for improvement lies in ensuring the explicit and auditable consideration of OUV in all major decisions from Board (Trustee) level outwards across the organisation.

5.6.4 Currently, the potential impact of decisions (of all scales) on OUV is not considered in an explicit and auditable manner. To address this, it is important to explicitly embed OUV considerations within decision-making processes. For example, incorporating explicit OUV-related criteria into the Annual Operating Plan could help reinforce the protection and promotion of the Tower of London's OUV and ensure it is given due consideration. Doing so would not only mitigate risks but also strengthen alignment with best practices in heritage management and ensure that OUV remains central to strategic and operational planning. This slight shift would enhance the organisation's ability to foster better coordination across HRP's varied operational and strategic components while further safeguarding the Tower of London's OUV.

5.7 Management of the Site's Setting

Introduction

5.7.1 The Tower of London is a powerful and iconic monument. Its character, sense of place and historic and current relationships with the wider city, the Thames, and other historic sites make a major contribution to its Outstanding Universal Value (see Section 2 for an overview of this). It is therefore critical that its setting is well managed to safeguard these aspects.

5.7.2 The following sets out what is meant by "setting", discusses the current evidence base for the setting of the WHS, outlines the changing nature of the site's setting, and then discusses the key issues relating to the setting of the WHS.

Definition of Setting

5.7.3 The National Planning Policy Framework (NPPF) defines setting as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". It also states

that “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. In terms of World Heritage Sites, a property’s setting can contribute to individual attributes of its OUV (see Section 2 above), and also contribute to our ability to appreciate the attributes of OUV.

5.7.4 This definition, and the approach to how to describe the setting of a heritage asset is further elaborated in Historic England’s Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets (GPA3) (2017). This document emphasises that a range of factors can contribute to the setting of an asset, and the contribution that that setting makes to its significance.

5.7.5 Both NPPF and GPA3 make it clear that setting is more than a visual and townscape concept and relates to a broad range of experiential factors. Critically, for conservation and development management, it is the contribution that the setting makes to the significance (or OUV) of a place that is important in terms of measuring the positive or negative impact of change.

Evidence base for the setting of the Tower of London

5.7.6 Effective management of change to the setting of an asset requires robust impact assessment founded on solid and up-to-date evidence. The descriptive and analytical evidence base for the setting of the WHS is currently limited in scope and out of date.

5.7.7 The **Tower of London Local Setting Study** (2010) is now out of date and does not reflect the physical changes over the last fifteen years and the changes in policy and guidance since 2010 e.g. NPPF and GPA3. The study is focussed on the local area around the Tower of London and does not address the setting of the site in the round.

5.7.8 The **London View Management Framework SPG** (LVMF) (2012) provides analytical material relating to a number of views featuring the Tower of London. These views are an important component of the Tower of London’s setting, but, as discussed in Section 2, other aspects also contribute to its setting. The LVMF is focussed on the management of these views, and this supports the

management of the setting of the WHS, but decision-makers needs to address a wider range of considerations alongside the LVMF when assessing impact on the Tower of London. The LVMF is currently being updated. See Figure E for location of viewpoints.

5.7.9 The description of setting in the **2016 Management Plan** pre-dates the current Historic England guidance on setting and does not reflect changes over the last c. 10 years. It describes the internal character of the spaces (and the influence that setting has on these) and defines local, immediate and wider setting (these concepts are no longer used in NPPF and GPA3).

5.7.10 In summary, it is clear that there is no up-to-date evidence base that describes the setting of the WHS, and fully articulates the contribution of setting to OUV.

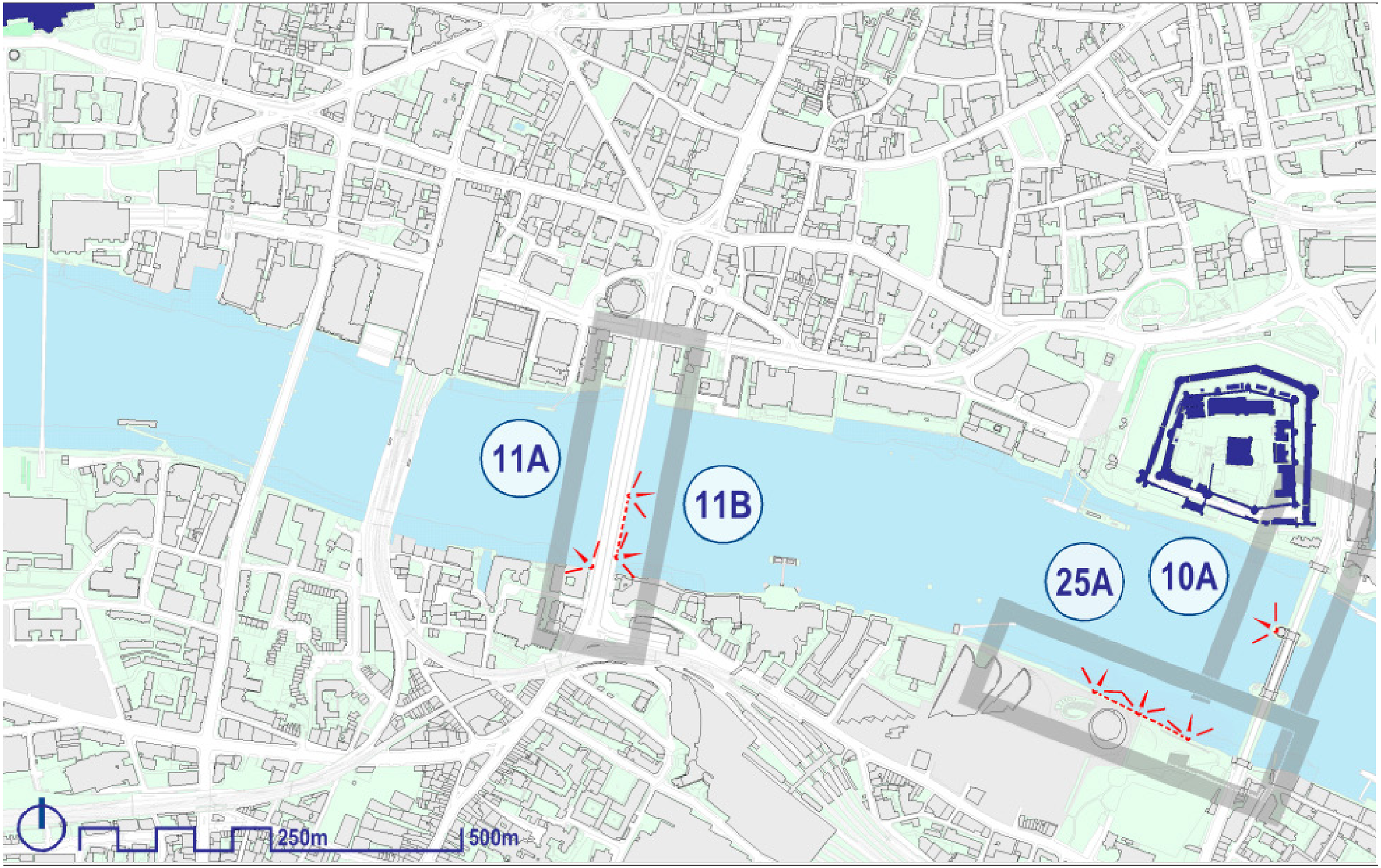
A Changing Setting

5.7.11 The setting of the Tower of London has changed considerably through time as the wider city has ebbed and flowed around the site, and functions have changed at the site and its wider environs.

5.7.12 Historically, open space was retained around the fortress using successive moat lines for defensive purposes. This land was held by the Crown and was formally defined by 1382. It was called the "Liberties" as it was held separate from the City. The sense of this open space around the Tower of London remains, to a degree, today.

5.7.13 During the late 17th and 18th centuries the re-building of the City after the Great Fire of London (1666) and its rapid expansion as the major trading centre and port saw the urban environment around the site rapidly change. This process continued into the 19th century with the wider city growing exponentially. This change included the expansion of the ports and associated warehouses including St Katharine's Dock, flanked by five-six storey brick warehouses. To the west, the eight-storey Mazawattee Warehouse[18] was built close to the Tower in the 1860s, leading to considerable protest due to its impact on views of the

[18] This building was demolished in 1951 due to bomb damage from World War II. The basements remain.


11A
11B
25A
10A
250m
500m

Tower of London and the connection to All Hallows Church. However, the Tower retained its dominance, and any lost through the construction of the warehouse was regained once it was demolished. Alongside these changes there was also the development of transport infrastructure to serve the city e.g. Fenchurch Street Station to the north in 1841, a new east-west road to the north of the Tower of London in 1882-4, and Tower Bridge in 1886-94. Over the river, the development of the Southwark bank, largely with warehouses, happened in parallel.

5.7.14 Following the Second World War and as a result of the damage caused, extensive re-planning of the city occurred, this included further widened and realignment of the road to the north of the property and the redevelopment of much of the area to the north and west of the Tower of London in the 1950s / 60s office uses. This process also occurred on the south bank in Southwark following the closure of the wharves and docks from the 1960s onwards.

5.7.15 Demand for office floorspace and residential property in London continued to grow during the late 20th and early 21st centuries. This has included the development of a cluster of very tall buildings in the City of London to the west of the Tower of London and an increasing number of other very tall buildings to the east and south, including the Shard.

5.7.16 Figures F, G and H provide a graphical overview[19] of the scale of change associated with the cluster in the City of London since the late 20th century, as experienced from viewing locations on Tower Bridge and the south bank of the Thames. These illustrations show how the relationship between the City and the Tower of London has evolved over recent decades.

Changes to the site's setting and their impact on OUV

5.7.17 For well over a decade concerns have been raised by UNESCO and ICOMOS regarding the impact on OUV that they consider new development is having due

[19] It should be noted that these are illustrations only, not accurate visual representations. In particular, Figures F and G correspond to but are not the exact LVMF kinetic viewpoints. The locations were picked due to the availability of photographs showing the changes to the London skyline over time.

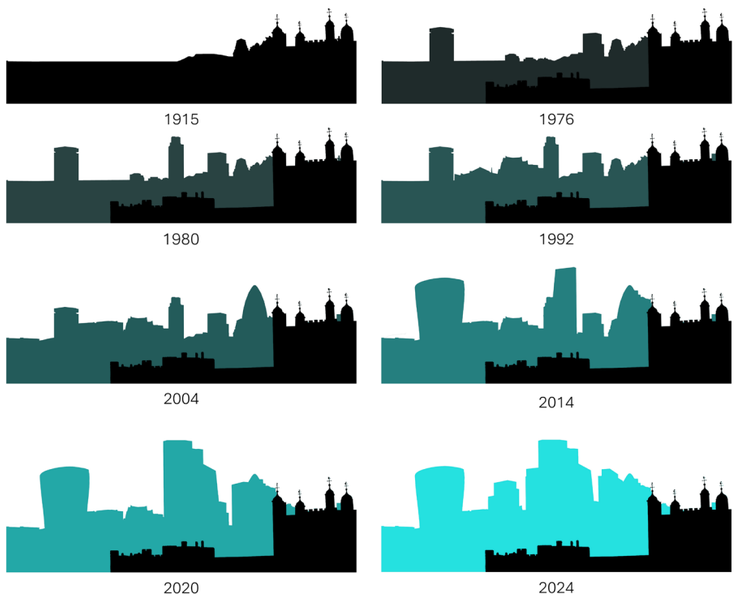
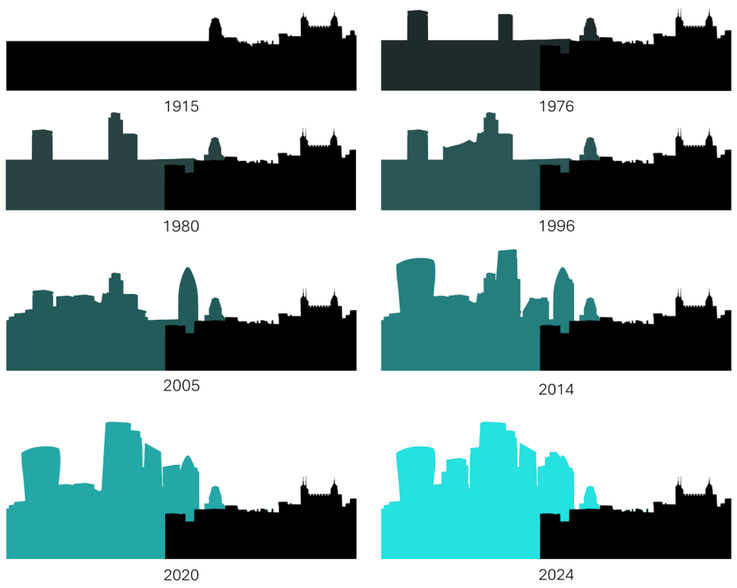


FIGURE F
CITY CLUSTER PROGRESSION VISUALISATION
TOWER BRIDGE - NORTH PIER



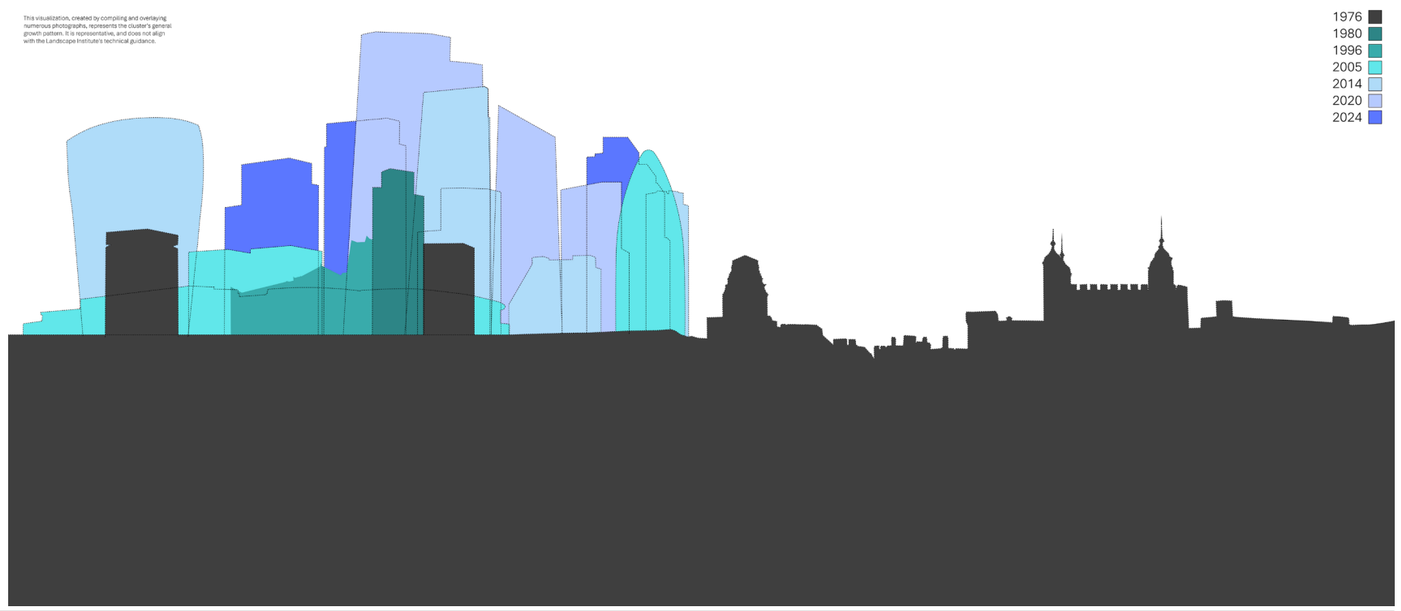
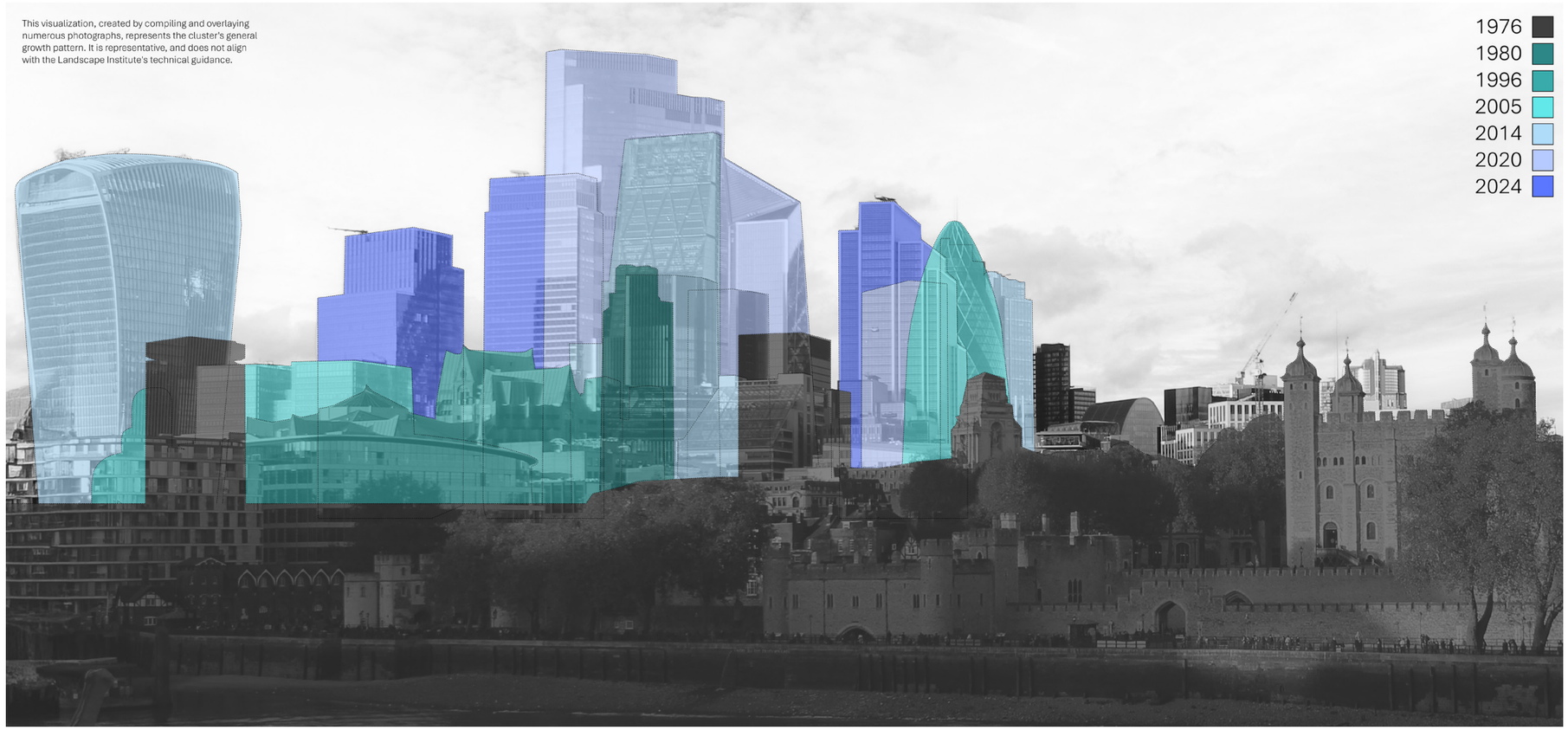


FIGURE G
CITY CLUSTER PROGRESSION VISUALISATION
QUEEN'S WALK



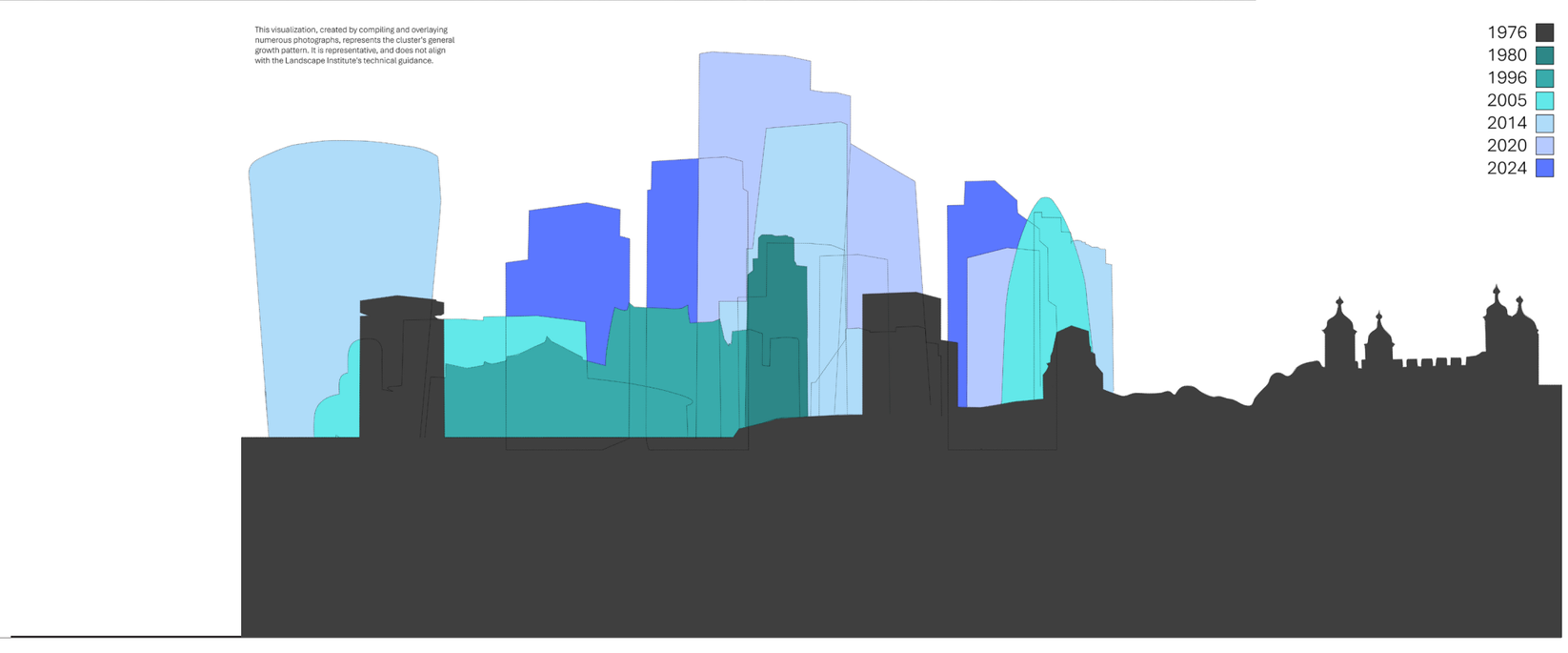


FIGURE H
CITY CLUSTER PROGRESSION VISUALISATION
TOWER BRIDGE - SOUTH PIER

to changes to the setting of the site. In particular, repeated concerns have been raised regarding the development of tall buildings, this includes the tall building cluster in the City of London, and tall buildings in the London Borough of Tower Hamlets and Southwark. This relates to factors 4.1.1 and 4.1.2 of the Periodic Reporting. These concerns are further reflected in the State Party's retrospective statement of OUV which was adopted by UNESCO in 2013 and subsequent Periodic Reporting. The section in the SOUV on the property's integrity outlined the threat that tall buildings within its setting could present if they were inappropriate to the context.

5.7.18 There are also ongoing issues with the management of the local area around the WHS, with challenges relating to public realm, traffic, access arrangements, and smaller-scale local development. Other risks to the setting, and possibly the OUV, include the management of green spaces and trees, including the plane trees along the Wharf.

5.7.19 Management of trees is governed by HRP's Tree Management Strategy and by the Landscape Management Plan. Both set out clear proposals for the trees on the Wharf. Moreover, the preservation of trees at the Tower of London, the replanting of trees that have been removed, and additional new planting in appropriate areas should all be considered as part of HRPs response to climate change and biodiversity loss.

5.7.20 These issues and developments are continuing and there are numerous proposals for further tall buildings that could change the setting of the WHS and affect its OUV. Some of these proposals are at plan-making stage, while other proposals are in the preapplication process or have been submitted for planning permission. Some developments are awaiting construction having been granted consent. Planning policies and legislative measures are in place to manage change that may affect the OUV of the Tower of London. This is important as there is a continuing need for change due to the dynamic growth of the wider urban environment of London.

5.7.21 It is therefore critical that all development and plan-making decisions are informed by robust and agreed Heritage Impact Assessments undertaken in accordance with the 2022 UNESCO Guidance, and guidance from Historic England and the Greater London Authority (see Section 4).

5.7.22 To achieve this and ensure that all proposals are addressed in a consistent manner it is important that an agreed evidence base describing the setting of the Tower of London is developed in accordance with the guidance in GPA3; alongside the revised and updated LVMF[20]. This Management Plan provides a high-level evidence base to inform HIAs and wider decision-making, but further analysis is required to better define and describe the setting of the WHS, and the contribution setting makes to OUV.

5.7.23 Importantly, the issue of cumulative impact needs to be addressed in HIAs. This should take account of the adopted Statement of OUV, the attributes of OUV, and change that has already occurred since inscription which may have already affected the OUV of the Site. This needs to be transparently and consistently addressed in HIAs for Local Plans and development proposals taking into account Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (2017) and Advice Note 4, Tall Buildings (2022), as well as the Greater London Authority's 2023 Planning Practice Note.

5.7.24 Additionally, in decision-making it is vital that decision-makers are fully cognisant of the fact that World Heritage Sites are assets of the highest importance and that, as set out in para 212 of the NPPF[21] "…*great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)*." In this context very great weight must be given to the conservation of the OUV of the WHS when weighing the public benefits of any scheme against the potential harm.

[20] As noted elsewhere, the LVMF is designed to manage change in certain views – it is not designed to manage change in the setting of the Tower of London in the round.
[21] December 2024 version.

5.7.25 UNESCO and ICOMOS continue to highlight their concerns regarding the cumulative impact of development in the wider city on the OUV of the WHS. Other longer-term issues such as climate change (see above) are significant threats, but they are less immediate and can be addressed through timed action. More immediate responses are required in relation to physical development and change that may affect the setting of the WHS and impact its OUV (see Objectives M.C.1 and M.C.2).

6.0 SECTION 6. RISK AND DISASTER MANAGEMENT

6.1.1 This section outlines HRP's risk and disaster management, providing an overview of the structures and practices in place to protect the Tower of London. HRP exercise risk and disaster management at corporate and site levels. The framework is designed to mitigate the risks posed by critical to major incidents, climate impacts, and potential threats to both cultural heritage and the physical estate. Risk and disaster measures not only protect operational capacity and visitor safety but also uphold the OUV of the site.

6.2 Corporate Level

6.2.1 HRP maintains a corporate Strategic Risk Register that identifies high level strategic and operational risks and is reviewed quarterly. This ensures that the operation of the Tower of London and its long-term conservation can continue without disruption.

6.3 Site Level

6.3.1 At the site level, HRP have integrated strategies for emergency response, climate adaptation, and long-term planning. HRP aligns its efforts with statutory requirements, sector best practices, and other heritage institutions, ensuring that priority is afforded to the preservation of the site's OUV.

6.3.2 HRP has established procedures and processes for the salvage of heritage items and architectural features during catastrophic events and maintains and supports a network of salvage experts.

6.3.3 HRP has a well-rehearsed Major Incident Plan, that is in line with the UK emergency services' management structure. This plan is supported by a suite of specialised tactical plans. The Major Incident Plan includes a Catastrophic Incident Response organised around two heritage leads, focussed exclusively on heritage protection, ensuring the protection of key elements of the site's OUV in the case of an incident:

- Collections Lead
- Historic Buildings Lead

6.3.4 The management of the Tower also addresses Cultural Protection in the event of Armed Conflict, implemented by HRP in their Major Incidents Plan. This is achieved through scenario testing with third party support and is in line with international standards for the protection of WHSs (Hague Convention, 1954).

6.3.5 Fire risk management at the site is reviewed quarterly, and annual risk assessments are conducted, alongside quinquennial audits. The fire safety policy is for protecting historic buildings. Extra fire risk checks have been put in place since the fire at the Notre Dame, with the White Tower under particular considerations as a key element of the site's OUV.

6.3.6 Additionally, HRP maintains a dynamic exchange with firefighters to streamline emergency interventions.

6.3.7 Statutory health and safety requirements are met and built upon with site-specific routines and arrangements. An annual safety report is prepared and shared with DCMS for additional scrutiny.

7.0 SECTION 7. OBJECTIVES

7.1 Introduction

7.1.1 The following objectives have been developed to inform and guide the ongoing management of the Tower of London in the context of the wider management framework. They respond to the Factors Affecting the Property (see Section 5) and the ongoing Tomorrow's Tower programme (see Section 3.5) which is seeking to address current accessibility and overcrowding issues, improve educational facilities, and create a more sustainable, visitor-focussed environment, all while ensuring the Tower's conservation and relevance for future generations.

7.1.2 The objectives are intended to be measurable and monitorable and, where relevant, accompanying actions will be delivered through the Action Plan. Some of the objectives, particularly those aimed at broader outcomes, are longer term, while others are more action focused.

7.1.3 The objectives are structured around the two key threads: internal actions that contribute to ongoing operational effectiveness and cohesion, and external initiatives that focus on engagement, sharing knowledge, and influencing broader outcomes to enhance the site's relevance and impact.

7.1.4 A summary table is provided below, which is followed by the full Objectives.

Physical Conservation	
Objective P.C.1	Maintain, update and implement the Conservation Management Plan on a 5-yearly cycle with the next revision completed by the end of 2025, to reflect changes in understanding, condition, and conservation priorities
Objective P.C.2	Continue the ongoing cycle of conservation works, proactive resolution of conservation issues revealed through inspections, with all critical issues resolved within 12 months of identification and non-critical issues addressed through a 5-year rolling programme

Objective P.C.3	Ensure long-term sustainable protection of the OUV through aligning conservation measures with climate change adaptation/ sustainability initiatives and scientific research
Visitor Management and Activation	
Objective V.A.1	By 2027, implement key improvements to the visitor flow (e.g., Moat access; interpretation planning) that demonstrably ease pressure on the Tower's most sensitive areas while maintaining access and engagement, monitored via annual visitor movement analysis
Objective V.A.2	Carry out annual assessments of visitor pressure, with mitigation actions for any areas exceeding capacity thresholds to protect the Tower's OUV
Objective V.A.3	Increase awareness of the Tower's World Heritage status across key groups by 2030
Operational and Residential Facilities	
Objective O.R.1	Maintain the ongoing residential use of the Tower at above 70% occupancy to preserve its cultural and historical character
Objective O.R.2	Continue efficient use of operational facilities without compromising the facets of the Tower's character and heritage that contribute to its OUV
Environmental Factors	
Objective E.F.1	Complete biennial proactive climate change risk assessments to safeguard the Tower's OUV, with a formal review and strategy update every 5 years
Objective E.F.2	Continue to reduce the Tower's environmental impact through sustainable operational practices, contributing to nature-positive carbon net zero across HRP's estates by 2050
Objective E.F.3	Explore ways of collaborating across the sector, with the results acted upon by 2027 to either establish a new channel or increase communication through an existing forum
Organisational Governance	

Objective O.G.1	Develop explicit and auditable mechanisms for integrating the consideration of OUV into HRP's strategic and operational frameworks by the start of the 2026 financial year
Objective O.G.2	Develop clear guidance for incorporating OUV into Heritage Impact Assessments at the site by the end of 2025 and implement across projects from 2026 onwards
Objective O.G.3	Continue with the WHS Coordinator Role and Participation in the London site managers' network
Objective O.G.4	Continue Involvement with the Broader UK WHS Network with participation in at least one event per year
Objective O.G.5	Schedule updates of the WHS Management Plan on a five-yearly cycle with interim updates triggered by any major change (e.g. new Setting Study; see M.C.1)
Management of the Site's Setting	
Objective M.C.1	Prepare a Setting Study in collaboration with key stakeholders and implements its findings
Objective M.C.2	Immediately ensure that Heritage Impact Assessments are undertaken for all proposals or plans outside of the WHS that have potential to affect the OUV of the WHS
Objective M.C.3	Ensure that all decisions regarding change that would affect the OUV of the WHS explicitly consider the need to conserve the OUV of the WHS
Objective M.C.4	Continue to monitor and respond to applications that would change the setting of the WHS and affect its OUV
Objective M.C.5	Monitor the changes to setting over time to address cumulative impacts and guide development
Risk and Disaster Management	
Objective R.D.1	Develop and implement a revised flood risk management strategy by 2030
Objective R.D.2	Share Disaster Response expertise with sector partners with a route of annual engagement established by 2026

7.2 Physical Conservation

7.2.1 Conservation and maintenance of the physical fabric of the Property is critical to safeguarding its OUV. The following objectives seek to support that, in the context of the more detailed guidance set out in the CMP.

Objective P.C.1: Maintain, update and implement the Conservation Management Plan on a 5-yearly cycle with the next revision completed by the end of 2025, to reflect changes in understanding, condition, and conservation priorities

7.2.2 The Conservation Management Plan is a critical document for the long-term conservation of the Property. The next revision is due to be completed in 2025.

7.2.3 It must be maintained, updated, and implemented on a 5-yearly cycle (or earlier if there is a major change), to reflect changes in understanding, the condition of the site, and evolving conservation priorities.

Objective P.C. 2: Continue the ongoing cycle of conservation works, with proactive resolution of conservation issues revealed through inspections, ensuring all critical issues are resolved within 12 months and non-critical issues addressed through a 5-year rolling programme

7.2.4 The State of the Estate surveys provide a robust basis for planning and delivering critical conservation works. It is critical that this process continues, and that regular surveys / inspections and implementation of planned annual conservation activities are delivered to ensure the long-term preservation of the property's historic fabric.

7.2.5 Maintaining this cycle of works and aligning them with the priorities and policies set out in the CMP, will help ensure the conservation of the Property's OUV. Conservation works and all other physical changes to the built fabric or archaeological deposits should be informed by research and a thorough assessment of their significance.

7.2.6 Additionally, conservation issues revealed through ad-hoc inspections should be addressed on a prioritised basis. Where critical issues are identified these

should be addressed urgently and robustly within 12 months of identification. Other non-critical issues can be addressed through longer-term programmes of work.

7.2.7 Finally, it is vital that appropriate levels of funding are secured and maintained for these ongoing conversation works, outside of major projects.

Objective P.C. 3: Ensure long-term sustainable protection of the OUV through aligning conservation measures with climate change adaptation / sustainability initiatives and scientific research

7.2.8 The Tower of London's physical fabric faces ongoing threats from climate change such as heavier rainfall, surface water flooding, and rising temperatures, and the delivery of new infrastructure for the sustainability agenda being pursued by HRP poses risks to the fabric and character of the site.

7.2.9 Addressing these agendas, and ensuring the conservation of the property, will require an integrated approach to the design and delivery of works. Opportunities should be identified to undertake comprehensive packages of work on a case-by-case basis to address sustainability upgrade, climate mitigation and conservation works in single phases. This offers potential to reduce disruption, potentially manage costs, and deliver integrated outcomes.

7.2.10 This approach aligns with the key categories for climate action with respect to World Heritage properties outlined in the UNESCO Policy Document on Climate Action for World Heritage (2023).

7.3 Visitor Management and Activation

7.3.1 Visits and corporate events are key to funding the ongoing conservation and management of the Tower of London. However, excessive tourism or poor visitor management pose risks to the Tower's physical structure, potentially harming its OUV. To address this, it is essential that tourism at the Tower continues to be carefully and proactively managed to ensure the conservation of the site's OUV.

Objective V.A. 1: By 2027, implement key improvements to the visitor flow (e.g., Moat access; interpretation planning) that demonstrably ease pressure

on the Tower's most sensitive areas while maintaining access and engagement, monitored via annual visitor movement analysis

7.3.2 Opportunities exist through the Tomorrow's Tower project to enhance visitor flow management and activate underutilised spaces like the Moat to ease pressure on the Tower of London's most sensitive areas while diversifying visitor engagement.

7.3.3 Targeted visitor management measures such as improving entry points and expanded access to the Moat, could potentially alleviate overcrowding in key locations helping safeguard the physical fabric of the Tower while improving visitor experience. Interpretation planning can refresh exhibitions to better tell the key stories of the Tower, providing enhanced interest for visitors, and thereby relieving pressure on the most popular exhibition spaces.

7.3.4 These improvements are embedded in the Tomorrow's Tower proposals and seek to ensure both accessibility and conservation, while diversifying the visitor experience. HRP will introduce key measures to improve visitor circulation before 2027. They will be developed and delivered in a manner that safeguards the character and fabric of the Tower of London.

Objective V.A. 2: Carry out annual assessments of visitor pressure, with mitigation actions for any areas exceeding capacity thresholds to protect the Tower's OUV

7.3.5 Continued monitoring and proactive management of visitor pressure are key to protecting the Tower of London's OUV and informing related initiatives. To this end, annual assessments will be undertaken to evaluate visitor flows and identify areas where capacity thresholds are exceeded.

7.3.6 Continued tracking of visitor numbers and identifying key pressure points across the site will help inform interventions under the Tomorrow's Tower strategy (see V.A.1). Where pressures are identified, targeted mitigation actions will be implemented to alleviate stress on sensitive areas.

7.3.7 Monitoring these outcomes will guide targeted measures to maintain a sustainable balance between access and conservation. This approach will ensure ongoing adaptability to visitor trends, safeguard sensitive areas, and reinforce the Tower's conservation. This quarterly cycle of assessment and response will enhance the Tower of London's ability to remain responsive to fluctuating visitor pressures while protecting its OUV.

Objective V.A. 3: Increase awareness of the Tower's World Heritage status across key groups by 2030

7.3.8 Raising awareness of the Tower of London's World Heritage Status among visitors, staff, and stakeholders can support the long-term protection of its OUV. Enhancing knowledge of the Tower's OUV and World Heritage status through tailored education and outreach strategies could strengthen the sense of collective responsibility to conserve it amongst all audiences and groups:

- Visitors: Integrate WHS education and awareness into public programming and signage with updated materials and exhibits.
- Staff: Conduct annual updates and briefings to keep staff informed about the Tower's WHS status and staff's role in preserving OUV.
- Stakeholders: Ensure the dissemination of the Management Plan to inform stakeholders about ongoing initiatives and challenges related to the Tower's WHS status.

7.3.9 The above will need to be delivered through a series of targeted actions for different groups, over the lifetime of the Management Plan.

7.4 Operational and Residential Facilities

7.4.1 The Tower of London has been continuously occupied for nearly a millennium, informing its OUV. This living heritage is supported by the continued care dedicated to the ongoing functioning of the operational and residential facilities at the site. In addition to the following objectives, P.C. 4 is also relevant.

Objective O.R. 1: Maintain the ongoing residential use of the Tower at above 70% occupancy to preserve its cultural and historical character

7.4.2 Continuing to maintain residential facilities is important to reflect the living heritage of the Tower of London, which contributes to the site's authenticity and OUV. The residential areas, which form a core part of the Tower's intangible heritage, will be maintained and used in a way that supports their historical significance while addressing the needs of modern residents. Sustaining an occupancy rate above 70% will be a key metric in preserving the cultural continuity and lived character of the site.

7.4.3 This includes ensuring that emerging residential requirements and modifications are carefully managed to avoid any significant negative impact on the site's fabric, character, or visitor experience (also see P.C.4). Regular monitoring of occupancy levels and proactive engagement with residents will support this objective, thereby helping to retain a thriving residential community within the historic setting.

Objective O.R. 2: Continue efficient use of operational facilities without compromising the facets of the Tower's character and heritage that contribute to its OUV

7.4.4 It is important to continue to manage the operational activities and infrastructure in a way that ensures the Site's OUV is conserved, while balancing the requirements linked to their use and maintenance. This includes ensuring that the functioning of operational facilities does not negatively affect the physical, visual, or experiential qualities that underpin the Tower's heritage value.

7.4.5 Ongoing maintenance and upgrades to operational facilities will be planned in conjunction with conservation practices (also see P.C. 3), addressing any emerging challenges, and balancing the need for operational efficiency with the requirements of preserving the Tower of London's OUV and visitor experience. Operational decisions will be guided by an understanding of the balance between the Tower's heritage values and its modern functions.

7.5 Environmental Factors

Objective E.F. 1: Complete biennial proactive climate change risk assessments to safeguard the Tower's OUV, with a formal review and strategy update every 5 years

7.5.1 Given the continuing rapid changes in global climate, it is vital that the potential risks posed by climate change to the Tower of London's OUV continue to be assessed and monitored. This ongoing risk assessment will focus on emerging threats such as:

- increased flooding
- temperature fluctuations
- extreme weather events

7.5.2 These assessments will be carried out annually and will contribute to a formal review and strategy update every three years.

7.5.3 The outcomes will drive targeted mitigation strategies that address and manage these risks, ensuring the long-term conservation of the Tower's physical fabric and historical significance. This will be supported by data obtained by monitoring occurrences and levels of the above threats, their effects on the property, to then formulate strategies to preserve its OUV. This cyclical review process will ensure that risk management approaches remain responsive to evolving climate conditions and aligned with best practice.

7.5.4 Where possible, the ongoing climate change risk management efforts should be aligned with the attributes of OUV, ensuring that any risks are identified, tracked, and reported in relation to these attributes as part of regular monitoring. This will also support the periodic reporting process.

7.5.5 Clear documentation and integration of risk findings into strategic planning will enhance the resilience of the site's heritage values over time.

Objective E.F. 2: Continue to reduce the Tower's environmental impact through sustainable operational practices, contributing to nature-positive carbon net zero across HRP's estates by 2050

7.5.6 HRP has established a clear ambition to actively reduce the environmental footprint of the Tower of London's operations. This needs to be achieved in a manner that safeguards the OUV of the Site (also see P.C. 3).

7.5.7 Innovative approaches to sustainability across all areas of operation may therefore be required to meet this agenda in the context of the Tower's highly sensitive historic environment.

7.5.8 Efforts taken to reduce the Tower's environmental impact over the course of this Management Plan will contribute to the Sustainability Action Plan's aim of nature-positive carbon net zero across HRP's estates by 2050 (see Section 5.5).

Objective E.F. 3: Explore ways of collaborating across the sector, with the results acted upon by 2027 to either establish a new channel or increase communication through an existing forum

7.5.9 To support Objective E.F. 2 there is an opportunity to deepen current collaboration with sustainability managers within the heritage sector to offer more opportunities to share best practice and innovations for addressing the environmental challenges. This includes a targeted effort to explore options for formalising or enhancing collaboration by 2027.

7.5.10 The establishment of a more formal platform for exchanging knowledge and solutions, could contribute to the broader sustainability objectives of the World Heritage community beyond the Tower. HRP already works informally with sustainability managers at other World Heritage Sites. Moving this to a formal basis through perhaps online fora / knowledge sharing sites, annual meetings etc., would increase opportunities for shared learning.

7.5.11 This initiative requires further exploration with key partners. This should occur by the end of 2026, after which the wider programme can be developed, if parties are willing. This might involve strengthening an existing forum or establishing a new, dedicated communication channel.

7.6 Organisational Governance

7.6.1 The successful governance of the site is key to ensuring the conservation of the attributes that inform the site's OUV and their preservation for future generations.

Objective O.G. 1: Develop explicit and auditable mechanisms for integrating the consideration of OUV into HRP's strategic and operational frameworks by the start of the 2026 financial year

7.6.2 By embedding OUV considerations into key frameworks, such as the Annual Operating Plan, HRP can ensure that every major decision, from Trustee Board level outwards, explicitly considers and supports the conservation of the Tower of London's OUV.

7.6.3 This approach will:

- Strengthen site management practices,
- Enhance alignment with best practices in heritage management, and
- Keep OUV central to organisational strategies, ensuring the Tower's ongoing conservation and cultural relevance.

7.6.4 Developing these mechanisms will enable HRP to achieve greater alignment between its operations, governance, and World Heritage obligations, supporting improved outcomes for the site and its global significance.

7.6.5 The exact format for this will depend on the requirements of HRP and the manner in which decisions are taken and reported at the differing levels of the organisation.

Objective O.G. 2: Develop clear guidance for incorporating OUV into Heritage Impact Assessments at the site by the end of 2025 and implement across projects from 2026 onwards

7.6.6 Heritage Impact Assessments (HIAs) are already undertaken to support major projects. These focus on the significance of the site, as defined in the CMP, and as established on a project-by-project basis through focused curatorial research. Formalising guidelines for HIAs for projects within the Tower of London will help

ensure that a proportionate approach to is taken to assessing and guiding proposals and that this explicitly addresses the OUV of the Site, in accordance with the 2022 UNESCO Guidance.

7.6.7 By embedding OUV criteria into the evaluation of planned projects, this objective will enhance consistent protection of the Tower of London's attributes, strengthening alignment with the *Operational Guidelines*. Given the range and number of projects requiring development, these guidelines should be developed and adopted in 2025; and implemented across all development within the site by 2026.

Objective O.G. 3: Continue with the WHS Coordinator Role and Participation in the London site managers' network

7.6.8 Maintenance of a dedicated WHS coordinator role (either as an internal position or as an external consultancy appointment) is required to ensure consistent management and implementation of WHS-related activities at the Tower, and to monitor the effectiveness of the management framework.

7.6.9 The role serves as a crucial point of coordination for the integration of OUV considerations into site operations and strategic planning.

7.6.10 The coordinator will continue to actively engage with the London WHS site managers' network, collaborating on issues such as heritage management, risk mitigation, and community engagement. This collaboration will strengthen the overall governance framework and facilitate coordination with other major WHS sites in London, ensuring that the Tower of London's OUV is protected through shared expertise and strategies.

Objective O.G. 4: Continue Involvement with the Broader UK WHS Network with participation in at least one event per year

7.6.11 Continued involvement with the wider UK WHS network can promote knowledge exchange and highlight emerging best practices in heritage conservation.

7.6.12 Continuing these connections will provide HRP with the opportunity to develop new methods for integrating OUV considerations into decision-making

processes, linking to objective O.G. 1, while supporting sector-wide improvements.

Objective O.G. 5: Schedule updates of the WHS Management Plan on a five-yearly cycle with interim updates triggered by any major change (e.g. new Setting Study; see M.C.1)

7.6.13 The Tower of London WHS Management Plan requires ongoing monitoring (see Section 8) to ensure it remains relevant and reflects the needs and challenges of the site.

7.6.14 A full update of the Plan will be required every 5 to 7 years, depending on whether external or internal factors change significantly. This should be aligned with the updates to the CMP and Annual Operating Plan.

7.6.15 Interim updates to the Plan are likely to be required to align with evolving priorities, such as sustainability efforts, visitor management strategies, and changes in evidence base (see Objective M.C.1).

7.7 Management of the Site's Setting

7.7.1 As set out in Section 5.7 development and change in the wider city has already affected, and could continue to affect, the setting of the Site and further impact on its OUV. The following objectives seek to ensure that such change is managed consistently and in accordance with national legislation and planning policy (see Section 4).

Objective M.C. 1: Prepare a Setting Study in collaboration with key stakeholders and implements its findings

7.7.2 To support consistent decision-making it is important that there is a more detailed evidence-base to inform the required Heritage Impact Assessments and guide development proposals. As such, HRP will support the preparation of a new Setting Study in collaboration with key stakeholders to replace the outdated 2010 document and 2016 Management Plan information.

7.7.3 Historic England and the Greater London Authority (GLA) would be key partners in the creation of the new Setting Study. Consultation would be required with

Consultative Committee, and the three key planning authorities, namely City of London Corporation, London Borough of Tower Hamlets, and London Borough of Southwark,

7.7.4 This should be developed in accordance with the general guidance on setting set out in GPA3[22]. The document can also draw on other best practice examples including the recently published analysis of the setting of St Paul's cathedral.

7.7.5 Once complete, the Setting Study will inform an interim update of the Management Plan, potentially including an update of the Attributes of OUV. The revised documents will then become a material consideration for decision making.

Immediately ensure that Heritage Impact Assessments are undertaken for all proposals or plans outside of the WHS that have potential to affect the OUV of the WHS

7.7.6 A process of heritage impact assessment is required by London Plan policy HC2 for all proposals that could affect the setting of the WHS, and hence affect its OUV. UNESCO has developed and adopted guidance for Heritage Impact Assessment (2022), and this should be applied (see Section 4). All HIAs should include a robust cumulative impact assessment which takes into account change that has occurred since inscription, and any affect on OUV that has already occurred. This process should take into account Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (2017) and Advice Note 4, Tall Buildings (2022).

7.7.7 Townscape and Visual impact assessments, along with the application of the LVMF can inform HIAs but are not HIAs in their own right and should not be used in place of formal HIAs.

[22] Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, see Section 4.

Objective M.C. 3: Ensure that all decisions regarding change that would affect the OUV of the WHS explicitly consider the need to conserve the OUV of the WHS

7.7.8 It is beholden on decision-makers to apply national and local policy appropriately and give very great weight to the conservation of the OUV of the WHS when weighing the public benefits of any scheme against the potential harm.

7.7.9 Additionally, if the relevant elements of the Levelling Up and Regeneration Act (2023) are bought into force, then decision-makers will also need to have special regard to the desirability of conserving the OUV of the WHS (see Section 4).

7.7.10 Where necessary, decisions should be called-in for determination by the relevant Secretary of State.

Objective M.C. 4: Continue to monitor and respond to applications that would change the setting of the WHS and affect its OUV

7.7.11 HRP currently monitor planning applications that may affect the setting and hence OUV of the WHS. Where potential issues are identified they provide comments or, if necessary, submit an objection to the proposal. This process should continue throughout the Management Plan's cycle to help ensure that all proposals receive the required level of scrutiny and consideration.

Objective M.C. 5: Monitor the changes to setting over time to address cumulative impacts and guide development

7.7.12 Currently, long-term change to the setting of the WHS is not monitored and recorded on a systemic basis. As part of the evidence base (see Objective M.C.1) monitoring measures can be developed e.g. fixed views, from which change over time can be recorded as part of the implementation and monitoring in the Management Plan (see Section 8). This process can also inform the required cumulative impact assessments.

7.7.13 These measures and the nature of the monitoring to be developed and specified, the monitoring section of the Management Plan (Section 8) will need to be updated once they have been developed.

7.8 Risk and Disaster Management

7.8.1 HRP's risk and disaster management is designed to protect the site's historical and cultural significance, while addressing contemporary challenges such as climate impacts and disaster preparedness. By integrating proactive measures and collaborative initiatives, HRP ensures the Tower remains resilient for future generations.

Objective R.D. 1: Develop and implement a revised flood risk management strategy by 2030

7.8.2 The Moat Legacy Project offers the potential to improve surface water flood management and protection against environmental threats such as rising water levels and extreme weather for the site. The project will enhance safeguards against flood risks, linking to the measures outlined in Factors affecting the property (Section 5).

7.8.3 It will need to be designed to respect the historical significance of the Tower of London, preserving key elements of its OUV, while addressing the risk from rising sea levels affecting the ability to drain the moat (see Sections 5.2 and 5.5). The project is due to be delivered by 2030.

7.8.4 Additionally, HRP will continue regular assessments of flood risk factors to adapt future strategies accordingly.

Objective R.D. 2: Share Disaster Response expertise with sector partners with a route of annual engagement established by 2026

7.8.5 HRP has robust and well-developed disaster response plans and expertise. An opportunity exists to share this expertise with other sites, including World Heritage Sites, in the UK and internationally. This could, for example, include:

- the establishment of a formal or informal network bringing together partners and heritage professionals to strengthen collaboration in risk management
- development of an online platform to share strategies, best practices, and knowledge on disaster preparedness and recovery
- hosting of and / or participation in workshops / events or conferences

7.8.6 The scope of such engagement and sharing will depend on resources available to HRP. It is recommended that the opportunity is scoped and explored in 2025/6, with the option to implement any recommended way forward after that point.

8.0 SECTION 8. MONITORING

8.1.1 Monitoring plays a crucial role in ensuring that the OUV of a WHS is sustained and that management practices are appropriate and effective. This includes ongoing monitoring of the State of Conservation, and the effectiveness of the current governance approaches.

8.1.2 As set out in Section 4, this Management Plan is part of a wider management framework for the WHS, and a key role for the Plan is to provide the overarching structure within which progress from across different strategies / programmes within that framework is monitored and evaluated.

8.1.3 The assessment of the effectiveness of actions taken and intended outcomes reached will be undertaken as part of the WHS Action Plan, which accompanies this Management Plan and is updated on an annual basis. This will ensure that necessary updates are drawn from a robust evidence base.

8.1.4 Monitoring is carried out by the Tower of London WHS Coordinator. This includes tracking the implementation of actions, evaluating the success of implemented strategies, and ensuring that any required adjustments or updates are implemented.

8.2 Monitoring Measures

8.2.1 The monitoring framework is aligned with the Objectives set out in Section 7. The following provides repeat monitoring actions:

	Monitoring Measure	Outcome	Frequency	Supports Objective	Factors Affecting the Property
1.1	Monitor that regular inspections of the vulnerable areas of physical fabric are undertaken and that these inform the ongoing cycle of maintenance and conservation	Physical fabric contributing to OUV is maintained, in context of HRP's targets for a 'Fair' condition for its estate with a declining number of areas in Poor condition (as defined in SOTE)	Annual	PC1	Physical Conservation
1.2	Review whether the CMP has been updated to inform priorities for conservation and management within the following 5-year cycle	Ongoing conservation and maintenance of the Tower's historic fabric	Quinquennial (Next update due in 2030)	PC2	Physical Conservation
1.3	Review whether all risk and disaster management strategies, including flood risk and climate change assessments, are regularly updated to take account of evolving guidance and experience about best practice	Risk and disaster management strategies are current and effective in protecting OUV	Biannual (Next update due in 2027)	RD1, EF1	Environmental Factors; Risk and Disaster Management

	Monitoring Measure	Outcome	Frequency	Supports Objective	Factors Affecting the Property
1.4	Review whether a process of HIA has been conducted for proposed new projects from an early stage and that the results have actively informed development of their design	Protection of OUV is at the root of project planning	Quarterly	OG2	Organisational Governance
1.5	Review Management Plan to address any changes to legislation or national, local, regional planning policy and guidance	Management Plan maintained as an up-to-date document	Annual	MC3	Management of Change affecting the setting of the Site
1.6	Review whether the WHS Management Plan and relevant policies have been updated in line with evolving conservation and organisational priorities within the Site	Up-to-date protection of the WHS and the attributes that make up its OUV	Every five to seven years (Next update due in 2030-2)	OG2, OG5	Organisational Governance, Physical Conservation
1.7	Review whether WHS awareness programmes for staff and visitors have been implemented and updated and evaluate their effectiveness	Increased knowledge of WHS status, enhancing OUV protection	Annual	VA3, OG1	Organisational Governance; Visitor Management and Activation

	Monitoring Measure	Outcome	Frequency	Supports Objective	Factors Affecting the Property
1.8	Review whether visitor flow management strategies have been assessed and adjusted prior to implementation	Balanced visitor management, protecting OUV while enhancing experience	Every three years (Next update due in 2028)	VA1, VA2, VA3	Visitor Management and Activation
1.9	Review whether climate change and sustainability efforts are effectively integrated into ongoing conservation activities	Sustainability and climate resilience measures are integrated across all conservation practices	Every three years (Next update due in 2028)	PC2, EF2, RD1	Physical Conservation Environmental Factors Risk and Disaster Management
1.10	Yearly review and subsequent update of Action Plan	The Action Plan remains current, responds to emerging challenges and opportunities, and aligns with the site's evolving needs and strategic vision	Annual	OG5	Organisational Governance

9.0 APPENDIX 1. TOWER OF LONDON WORLD HERITAGE SITE CONSULTATIVE COMMITTEE TERMS OF REFERENCE

HISTORIC ROYAL PALACES

Tower of London World Heritage Site Consultative Committee

Terms of Reference

2022

Remit

The remit of the Tower of London World Heritage Site Consultative Committee (the Committee) is set out in the Tower of London World Heritage Site Management Plan June 2016:

" 8.5 The Tower of London World Heritage Site Consultative Committee (the Committee), a group including on-site partners, local authorities and heritage specialists, will provide a forum for consulting on issues affecting the Tower and its environs.

8.6 In addition to the above, specialists and representatives of other relevant interested parties will be invited to participate in Committee discussions as and when appropriate. The Committee will review progress on the various objectives and assist in monitoring implementation of the action plan."

Management of the Committee

Historic Royal Palaces, as the organisation responsible for the World Heritage Site, will be responsible for managing the Committee, including providing the Committee Chair and administration.

Once approved by the Committee, minutes will be posted on the Historic Royal Palaces website.

A member of Historic Royal Palaces' staff will act as World Heritage Site Co-ordinator (a part-time commitment).

Tasks of the Committee

The Committee will:

- identify issues affecting the World Heritage Site and determine actions to address them;
- review progress in implementation of the actions in the Management Plan and monitor success in meeting its objectives;
- promote good working relationships and co-ordination between Committee organisations in implementation of the Plan;

- receive reports from responsible bodies and agencies regarding projects which affect the World Heritage Site;
- oversee the future updating of the Management Plan, as and when appropriate;
- ensure that the 5 year review of the Management Plan takes place and determine the structure of the Committee after the 5 year review.

Membership of the Committee:

The Committee will comprise representatives of the following organisations:

Historic Royal Palaces

Royal Fusiliers

Royal Armouries

Royal Collection Trust

Historic England

Department for Culture, Media and Sport

Greater London Authority

London Borough of Tower Hamlets

London Borough of Southwark

City of London Corporation

ICOMOS-UK

The Committee may agree to invite other organisations to join the Committee, or attend Committee meetings, as appropriate, including consultants and advisors.

Meetings of the Consultative Committee

The Committee will meet annually unless circumstances require a different frequency to be agreed.

Sub-groups of the Committee, set up to address particular aspects of the Management Plan, will meet as required.