



Development affecting Westminster World Heritage Site - Guidance for applicants on Heritage Impact Assessment

1 Background

1.1 The Palace of Westminster and Westminster Abbey, including St Margaret's Church was inscribed as a cultural World Heritage Site in 1987 in recognition of its international importance or '**Outstanding Universal Value**' (OUV)¹.

1.2 Any development or proposal which impacts on a World Heritage Site must be assessed in terms of its OUV and UNESCO recommends the use of Heritage Impact Assessment (HIA) to assess and evaluate these impacts.

1.3 In 2017 an ICOMOS/ ICCROM Reactive Monitoring Mission visited Westminster World Heritage Site and raised concerns that HIA was not routinely being carried out for all development in or affecting the Site. They recommended that all future projects likely to have an impact on the Outstanding Universal Value should be subject to an HIA².

1.4 The overlapping statutory and local validation requirements for applicants to produce Heritage Assessments, Design and Access Statements, Heritage Impact Assessment and Environmental Impact Assessment can, however, cause confusion.

1.5 This note includes: (i) guidance on information requirements for applicants undertaking development or works with the potential to affect the Westminster World Heritage Site or its setting and (ii) outlines requirements to notify the World Heritage Centre of development affecting the site (at Part 6). The guidance applies to proposals in the City of Westminster, although may be useful for applicants preparing Heritage Impact Assessments for proposals in other boroughs affecting the setting of Westminster World Heritage Site.

2 Policy Background

2.1 The [Operational Guidelines for the Implementation of the World Heritage Convention](#) (2019) stress the importance of Heritage Impact Assessment, noting at paragraph 118 that these should be *a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property*.

¹ OUV is the term used by UNESCO to describe the significance of a site which is considered *so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity*'.

² <https://whc.unesco.org/en/list/426/documents>

2.2 The [National Planning Policy Framework](#) at paragraph 189 notes that local planning authorities should require an applicant to describe the significance of any heritage asset, including any contribution made by their setting. In relation to World Heritage Sites, the supporting Planning Practice Guidance refers applicants to the approach to heritage assessment set out in the International Council on Monuments and Sites (ICOMOS) Guidance on Heritage Impact Assessments³.

2.3 Emerging London and local policies also stress the importance of HIA. The [Intend to Publish London Plan 2019](#) policy HC2 Part C requires development proposals to be supported by HIA and notes *Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment*. The emerging [Westminster City Plan 2019-2040](#) also includes at Policy 40 a requirement to use Heritage Impact Assessment methodology in assessing impacts on OUV.

3 Applications with potential to affect the World Heritage Site – Assessing Impacts on OUV

3.1 Applicants proposing change that might affect the Outstanding Universal Value of the World Heritage Site through development within the Site or affecting its setting will need to submit sufficient information with their applications to enable assessment of impacts on Outstanding Universal Value, as outlined below. This is in addition to any assessments of impacts on individual heritage assets within the site.

3.2 Applications should therefore be accompanied by a proportionate level of information which specifically relates to the World Heritage Site and describes and assesses the impacts of proposals on **Outstanding Universal Value (OUV)**. In making this assessment, the primary source for understanding the site which should be referred to is Westminster's [Statement of Outstanding Universal Value](#). Reference should also be made to the draft **Attributes of Outstanding Universal Value** and **significant views** identified within relevant policy documents, including the Management Plan.

3.3 The level of detail required with your application will depend on the nature of the proposed development and magnitude of any impacts. Westminster City Council's local validation list⁴ requires a **Heritage Impact Assessment (HIA)** which follows ICOMOS methodology with applications in Westminster for development affecting the OUV of the Site. This is in addition and separate to the requirement for a Heritage and/or Design and Access Statement. However, a full separate HIA following the structure set out in ICOMOS guidance may not always be required (see section 4 below).

3.4 Most applications within or affecting the Westminster World Heritage Site will also be accompanied by a supporting statement in the form of a **Heritage Statement, Design and Access Statement** and **Environmental Statement**.

³ https://www.iccom.org/sites/default/files/2018-07/icomos_guidance_on_heritage_impact_assessments_for_cultural_world_heritage_properties.pdf

⁴ <https://www.westminster.gov.uk/validation-your-planning-applications>

- National Information requirements specify that any application for listed building consent or planning permission for certain types of development within a world heritage site⁵ must be accompanied by a [Design and Access Statement](#).
- World Heritage Sites are also identified as ‘sensitive areas’ for the purposes of determining if an Environmental Impact Assessment is required.
- Our local validation list requires a Heritage Statement for listed building consent applications and for applications affecting heritage assets and their settings.

3.5 Information should be structured in such a way as to demonstrate you have addressed the requirements set out in the ICOMOS methodology in developing proposals (see below) but should avoid duplication across different documents.

3.6 These requirements should be discussed fully at pre-application and/or scoping/screening stage and agreement reached with the Local Planning Authority and Historic England on how the information should be submitted and presented to address the issues. Further advice is set out below.

4. What is a Heritage Impact Assessment (HIA)?

4.1 A **Heritage Impact Assessment** is distinct from a heritage statement and should be the first stage undertaken to inform development, addressing the suitability of a site to accommodate development while avoiding harm to the World Heritage Site, its OUV, and setting, and any potential mitigation measures. HIA is an iterative tool which should be used to inform and to help make decisions in the design phase of a project or development.

4.2 A Scoping Report (or HIA brief) should be agreed with relevant parties –the council, Historic England or others as necessary and should make it clear what is to be done, why and how, when and what are the expected output.

4.3 Applicants should refer to the methodology set out in ICOMOS’s Heritage Impact Assessment guidelines. This stresses the need to assess the impact on OUV overall, using the identified attributes of OUV as a baseline for assessment of these impacts.

4.4 The document notes that *‘EIA frequently disaggregates all the possible cultural heritage attributes and assesses impact on them separately, through discrete receptors such as protected buildings, archaeological sites, and specified view-points with their view cones, without applying the lens of OUV to the overall ensemble of attributes. A more global approach to the site is required, one directly linked to the expression of the site’s OUV’.*

4.5 A separate stand-alone Heritage Impact Assessment document setting out the impacts on the World Heritage Site will be required where it has been agreed with the Local Planning Authority and Historic England that there is likely be a significant impact on the World Heritage Site. The ICOMOS guidance provides at Appendix 4 a structure which can be used where a full stand-alone HIA is being prepared. Further advice on relationship with the EIA process is set out below at Section 5.

⁵ <https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement>

4.5 The HIA should reflect the scope of detail relevant and proportionate to what is being proposed. For smaller scale cases, it is considered sufficient for the assessment to be within the overall heritage or design and access statement. This must contain a separate chapter or clearly marked subsection titled **World Heritage Site Heritage Impact Assessment**, which demonstrates impact assessment methodology has been used in developing proposals and which includes this key information:

- i. **A Summary of Westminster’s OUV, authenticity and integrity, making reference to the Statement of OUV and Attributes of OUV;**
- ii. **A description and evaluation of range of impacts arising from the development or other proposal for change (beneficial and adverse) on the site’s OUV, integrity and authenticity;**
- iii. **An assessment of any risk posed to the retention of OUV and the likelihood that the property may be in potential or actual danger;**
- iv. **A statement of heritage benefits which may arise from proposals which may better reveal or enhance the OUV of the World Heritage Site and its setting, including better understanding and awareness-raising;**
- v. **A Statement of how harmful impact has been mitigated or avoided.**

4.7 Assessment should focus on the impact these changes could have on the OUV of the World Heritage Site. There should be a clear statement or conclusion summarising the effects on the attributes of OUV of the World Heritage Site. When changes to World Heritage Sites are planned, adverse impacts should be avoided where possible. HIA should always be an objective and impartial assessment of impacts and its purpose is not to justify a specific scheme. Information should be structured in such a way as to demonstrate you have addressed the requirements set out in the ICOMOS methodology in developing proposals but should avoid duplication.

4.8 In all cases, professional judgement should be used to determine whether or not the likely level of harm is such as to merit a full HIA and **where a full separate HIA is not being undertaken, this should be agreed with the local planning authority at pre-application stage and the Heritage or Design and Access Statement should set out the reasons why this is not necessary.**

5. When is Environmental Impact Assessment (EIA) required?

5.1 World Heritage Sites are also identified as ‘*sensitive areas*’ for the purposes of determining if an Environmental Impact Assessment is required. This means that a screening^[1] to determine whether the proposed project falls within the remit of the regulations should be undertaken for **development which is located either wholly or partly within the boundaries of Westminster World Heritage Site**. This requirement does not apply to applications for listed building consent. As all buildings in Westminster World Heritage site are listed, the scale of the majority of proposals within the site itself are unlikely to have significant environmental impacts so in most cases an EIA will not be required. An HIA may still be required as set out above.

^[1] See paragraph 32 Sensitive Areas of NPPG advice on Environmental Impact assessment.

5.2 Outside the World Heritage Site, a screening to determine the need for an EIA is only required for development which meets the thresholds listed in **Schedule 2 of the 2017 Environmental Impact Assessment regulations**⁶. Issues relating to World Heritage Sites and their settings should be considered rigorously at the screening and scoping stages.

5.3 If it is determined that EIA is required, the scoping should consider how the World Heritage Site and heritage issues are to be addressed but a separate HIA in relation to impacts on the world heritage site is likely to be needed.

5.4 To avoid duplication, the ICOMOS Guidance advises that the HIA should be summarised early on in the Environmental Statement, and the full technical HIA report should be included as a technical appendix – this should be an HIA specific to the World Heritage Site in line with the structure set out in Appendix 4 of the ICOMOS Guidance. If, following screening, it is determined that an EIA is not required, an HIA may still be required. The requirements should be discussed and clarified at the planning or scoping stage with the Council and Historic England.

5.5 Further advice on the EIA process can be found in National Planning Practice Guidance on Environmental Impact Assessment:
<https://www.gov.uk/guidance/environmental-impact-assessment#proposed-development>.

6. Role of UNESCO. When and how to notify the World Heritage Centre of proposals with potential to affect the Westminster World Heritage Site

6.1 Under Paragraph 172 of the Operational Guidelines, the World Heritage Committee asks the State Party to make sure that it is informed at an early stage of proposals that may affect the Outstanding Universal Value of the Site.

6.2 The Department for Culture, Media and Sport (DCMS) acts as the ‘State Party’ representing the UK Government on the implementation of the World Heritage Convention. All formal communication between the WHS and the UNESCO World Heritage Centre must pass via DCMS acting as the ‘state party’.

6.3 Notifications therefore have to be made via the State Party and must be given as early as possible in the planning process, at early pre-application stage and “*before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value is fully preserved*”.

6.3 As a general rule, the World Heritage Committee will only be notified on proposals that are likely to have a significant or harmful impact on OUV but decisions on whether to notify the World Heritage Centre of proposed development, in line with paragraph 172 of the Operational Guidelines, are taken by DCMS in consultation with Historic England.

⁶ [Town and Country Planning \(Environmental Impact Assessment\) Regulations 2017 \(the ‘2017 Regulations’\)](#)

6.4 There is no set process for doing this but Westminster City Council maintains a database of schemes with potential to impact on the World Heritage Site and will alert the DCMS in relation to proposals that might need notification. Historic England will also be notified of most applications that have the potential to affect the Outstanding Universal Value of Westminster World Heritage Site as a result of the usual consultation triggers and can advise whether the DCMS should be informed of the proposed works.

6.5 It is also recommended proposals are notified to and presented at the World Heritage Site steering group in order to determine in discussion with Historic England and the DCMS the extent of potential impacts on OUV and whether the World Heritage Centre should be notified.

Appendix 1: Heritage Impact Report Contents (Taken from ICOMOS Advice Appendix 4)

The report should include:

- the proper name of the WH property,
- its geographical coordinates,
- the date of inscription,
- the date of the HIA report,
- the name of the organization or entities responsible for preparing the HIA report, for whom it was prepared, and
- a statement on whether the report has been externally assessed or peer-reviewed.

Outline report contents

1 Non-technical summary – must contain all key points and be useable alone.

2 Contents

4 Introduction

4 Methodology

- Data sources
- Published works
- Unpublished reports
- Databases
- Field Surveys
- Impact Assessment Methodology
- Scope of Assessment
- Evaluation of Heritage Resource
- Assessment of Scale of Specific Impact and Change
- Evaluation of Overall Impact
- Definition of the Assessment Area

5 Site history and description –

Key in this section will be the Statement of OUV, and a description of the attributes which convey OUV and which contribute to the Statements of authenticity and integrity.

This section should also include any nationally or locally designated sites, monuments or structures as well as non-designated sites. It should set out the historical development of the study area, and describe its character, such as the historic landscape, including field patterns, boundaries and extant historic elements of the landscape and cultural heritage.

It should describe the condition of the whole and of individual attributes and components, physical characteristics, sensitive viewpoints and intangible associations which may relate to attributes. This should focus on areas affected in particular but must include a description of the whole.

6 Description of changes or developments proposed

7 Assessment and evaluation of overall impact of the proposed changes

This part should set out an assessment of specific changes and impacts on the attributes of OUV and other heritage assets. It should include a description and assessment of the direct or indirect impacts, including physical impacts, visual, or noise, on individual heritage attributes, assets or elements and associations, and on the whole. Impact on OUV should be evaluated through assessment of impact on the attributes which convey the OUV of the site. It should consider all impacts on all attributes; professional judgement is required in presenting the information in an appropriate form to assist decision-making.

It should also include an evaluation of the overall significance of effect – overall impact - of the proposals for development or change on individual attributes and the whole WH property. This may also need to include an assessment of how the changes may impact on the perception of the site locally, nationally and internationally.

8 Measures to avoid, to reduce or to compensate for impacts - Mitigation Measures Such measures include both general and site or asset-specific measures and cover

- those needed before the development or change proceeds (such as archaeological excavation),
- those needed during construction or change (such as a watching brief or physical protection of assets) and
- any post-construction measures during the operation of any proposed change or development (such as interpretation or access measures, awareness-building, education, reconstruction proposals),
- proposals to disseminate information, knowledge or understanding gained by the HIA and any detailed desk, field or scientific studies.

9 Summary and Conclusions, including

- A clear statement on effects on the Outstanding Universal Value of the WHS, its integrity and authenticity,
- The risk to the Inscription of the site as a WH property,
- Any beneficial effects, including better knowledge and understanding and awareness-raising.

10 Bibliography

11 Glossary of terms used

12 Acknowledgements and authorship

13 Illustrations and photographs showing for example

- Location and extent of sites, including buffer zones
- Any study area defined
- Development or proposals for change
- Visual or inter-visibility analyses
- Mitigation measures
- Key sites and views

14 Appendices with detailed data, for example

- Tables of individual sites or elements, summary description and summary of impacts
- Desk studies
- Field study reports (such as geophysical survey, trial evaluation, excavation)
- Scientific studies

List of consultees and consultation response